

27-07-2022

### **Joore NV Privacy statement**

By using our website, you approve of the use of your data as set out in this Privacy Statement. We will use personal data only in accordance with the Dutch Personal Data Protection Act (“Wet bescherming persoonsgegevens”).

We use only data that has been provided expressly and voluntarily by persons visiting our website. If you request information through our website we will ask you for your name, address and some additional information. As a result of that you may be approached by telephone or email in order to check whether you have received the correct information. If you are looking for vacancies, apply for published vacancies or send an open application, you will provide personal data on your own initiative. This data is stored in a secured environment and can be accessed only by a limited group of professionals in our organization. Data obtained is not leased or sold to third parties in any case.

Cookies are used in order to safely offer you the information you are looking for, and in order to allow the proper technical performance of this website. Cookies are not used for making unsolicited offers.

We are interested in data that provides insights into the success of our website. For that reason, we log your IP address and domain name. In order to adapt the facilities and functions to the appliances of the user we also check the type of browser you use to access our website. This information is the property of Joore NV. The information collected is used for the purpose of improvement of our services and marketing activities. This data is also not leased or sold to third parties in any case.

Joore attaches great value to your opinion and any suggestions concerning our website. If you have any questions, remarks or suggestions, please contact us through [info@joore.nl](mailto:info@joore.nl).

For this purpose, Joore NV is responsible for the processing of personal data as set out in this Privacy Statement, which has been drawn up on the basis of our privacy policy.

### **Contact information**

The compliance officer is the supervisor and first point of contact concerning the processing of personal data in our firm. The compliance officer can be reached through:

Joore Registeraccountants en Belastingadviseurs, attn. Marjon van Eggelen, Dr. Hub van Doorneweg 185, 5026RD Tilburg by post, or by email: [marjon.van.eggelen@joore.nl](mailto:marjon.van.eggelen@joore.nl).

### **Personal data that is processed by us**

Joore NV processes personal data of clients who use our services and/or clients who provide such data to us themselves.

Below you will find a list of the personal data we process with respect to the following categories:

1. clients;
2. applicants;

The purposes of processing and persons who have access to the personal data have been determined for each category.

#### **1. Clients**

1. Processing takes place for only the following purposes:
  1. identification;
  2. drawing up a risk profile under the Dutch Money Laundering and Terrorist Financing (Prevention) Act, “Wwft”;
  3. maintaining contact with clients;
  4. performance of services as agreed with clients;
  5. performance under or application of a different law.

#### **2. Applicants**

1. Processing takes place for only the following purposes:
  1. assessment of the suitability of the person concerned for a current or future vacancy;
  2. settlement of costs incurred by the applicant;
  3. internal control and company security;
  4. performance under or application of a different law.
2. Only the following data is processed:
  1. name, given names, initials, title, gender, date of birth, address, postcode, place, telephone number and similar data necessary for communications, as well as the bank account number of the person concerned;
  2. an administration number not containing any data other than the information referred to under 2.1;
  3. nationality and place of birth;
  4. information referred to under 2.1 and 2.2 of parents, guardians or caregivers of underage applicants;
  5. information concerning education, course and internships, attended and to be attended;
  6. information concerning the position applied for;
  7. information concerning the nature and content matter of the present employment and its termination;
  8. information concerning the nature and content matter of previous employments and their termination;
  9. information concerning the motivation for the position and organization;
  10. other information concerning the job performance, that has been provided by or is known to the person concerned;
  11. other information than the information referred to under a to i of which processing is required under or necessary for the purpose of the application of a different law.
3. The personal data is provided only to:
  1. those persons, including third parties, who have been charged with or manage the activities referred to in the first paragraph or whose involvement in that is necessary;
  2. other persons in case of a legitimate reason under the GDPR.

#### **Special and/or sensitive data that is processed by us**

Joore NV processes the following special and/or sensitive personal data of yours:

- Citizen Service Number (Dutch: "Burgerservicenummer", "BSN").

This personal data is used only for the purposes/services agreed with client.

In case of change of purposes or services this will be addressed again with the person concerned.

#### **The basis on which and purpose for which we process personal data**

Joore NV processes personal data for the following purposes:

- after your approval, e.g. for sending our newsletter, for the purpose of sending you the newsletter;
- performance of the agreement, so that we may call or email you if necessary for the performance of our services;

- a statutory obligation, because we are obliged, both by our professional association (“NBA”) and under the law and regulations, to ensure appropriate file management during our services.

#### **For how long do we store personal data?**

Joore NV does not retain personal data any longer than strictly necessary to achieve the purposes for which data is retained, or than the statutory retention terms, with which we must comply. We apply the following retention terms for the following (categories of) personal data:

- a retention term of 30 days applies to cookies on our website;
- data of a potential client (that is sent to our firm for instance through the website), will be erased after 30 days in case the potential client has not become a client of our firm. In case a potential client has become a client of our firm, the data is retained for as long as necessary for the services to the client;
- for storage of personal data in applications and files for the purpose of providing services to the client, our firm complies with the statutory retention term, which in many cases is 7 years.

#### **Sharing personal data with third parties**

Joore NV does not sell any personal data of clients to any third parties and makes them available only if necessary for the purpose of performance of the agreement entered into between the client and us, or in order to comply with a statutory obligation. This also includes right of inspection of authorities such as the Dutch Tax authority (“Belastingdienst”). We enter into a data (sub)processing agreement with organizations that process data for our clients on our behalf to ensure the same level of security and confidentiality of personal data of clients. Joore NV will remain responsible for such processing operations.

In special cases we may provide personal data to external experts, such as a notary public, lawyer or pension expert, under an engagement with these external expert(s) agreed with the client. In that case we will not provide this data to this (these) external expert(s) without the approval of the client.

This data is not used for commercial purposes.

#### **Website**

With respect to your visit to our website and personal data the following applies.

#### **Cookies or similar techniques used by us**

Joore NV uses functional, analytical and tracking cookies, also by means of Google Analytics. A cookie is a small text file which is stored in the browser of the appliance used during the first visit. Joore NV uses cookies that have a purely technical function. They ensure that the website works properly and that it may be optimized. In addition to that we place cookies that track visitors’ surf behavior to enable us to offer customized content.

During the first visit to our website we inform visitors about these cookies and we ask them for their approval before placing these cookies.

Visitors may opt out of receiving cookies by adjusting the settings of the internet browser in such a way that it does not store cookies any longer. In addition to that users may also remove any information that was stored previously by means of the browser settings.

#### **LinkedIn, Facebook and Instagram**

This site has buttons to promote pages or share them via the LinkedIn, Facebook and Instagram social networks. These buttons are generated by code supplied by LinkedIn, Facebook and Instagram themselves. This code also places a cookie. Please read the privacy statements of LinkedIn, Facebook and Instagram (which may change from time to time) in order to see what they will do with your personal data which they process by means of this code.

#### **Accessing, modifying or erasure of data**

Data subjects (persons whose data is processed by us) have the right to access personal data and to request that it is rectified or erased. In addition to that data subjects have the right to withdraw any permission for data processing or to object to processing of personal data by Joore NV; data subjects also have the right to data portability. That means that data subjects may request us to transfer the personal data processed by us to the data subject, or a different organization indicated by the data subject.

Data subjects can send a request for access, rectification, erasure, data portability of their own personal data, or a notification of withdrawal of the approval or an objection to the processing of personal data to: [marjon.van.eggelen@joore.nl](mailto:marjon.van.eggelen@joore.nl).

In order to ensure that the request for access has been made by the data subject, we request that a copy of the identity document is attached to the request. Please black out in this copy the passport photo, the MRZ (machine readable zone, the strip with numbers below on the passport), if any, the document number and the Citizen Service Number (“BSN”). This is for the protection of privacy. We will respond to the request as quickly as possible but no later than one month.

Joore NV also wishes to point out to data subjects that they have the possibility to submit a complaint to the national authority, the Personal Data Authority (“Autoriteit Persoonsgegevens”). To do so you can use this link:

<https://autoriteitpersonaldata.nl/nl/contact-met-de-autoriteit-personal-data/tip-ons>

#### **How we secure personal data**

Joore NV takes the protection of personal data seriously and takes appropriate (technical) (security) measures to counter unauthorized use, loss, unauthorized access, unauthorized publication and unauthorized modification. If data subjects have the impression that data is not secured properly or in case of indications of unauthorized use, please contact our compliance officer: [marjon.van.eggelen@joore.nl](mailto:marjon.van.eggelen@joore.nl).