

PRIVACY POLICY

SYNOTION

1. Introduction

SYNOTION, having its registered office at Stationsweg 46, 6861EJ, OOSTERBEEK, registered with the Chamber of Commerce under number 72947055, is responsible for the processing of personal data as set out in this privacy statement.

SYNOTION respects your privacy and processes your personal data with the utmost care. This privacy policy explains how SYNOTION collects, protects, uses, and transmits personal data. It also provides information about your rights regarding the personal data SYNOTION obtains, uses and stores about you.

Please read this privacy policy carefully. By accessing and using the Website, you confirm that you have read, understood and accepted this privacy policy. We may change this privacy policy from time to time. On the Website, you will always have access to the latest version of this privacy policy.

SYNOTION will process your personal data in accordance with the Data Protection Act and - as of 25 May 2018 - the General Data Protection Order, and other laws and regulations in force and applicable with regard to the processing and protection of personal data.

Contact information Owner:

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2. Personal data that we process

SYNOTION processes your personal data by using our services and/or by providing them to us yourself. Below you will find an overview of the personal data we process:

- First name and surname
- Company name
- Address details
- Telephone number
- E-mail address
- IP address
- In some cases a social media reference in footer of mail
- Bank account number
- Chamber of Commerce number
- VAT number

3. For what purpose and on what basis do we process personal data?

SYNOTION processes your personal data for the following purposes:

- Execution of our services under an agreement, in part with a system for automated decision making and explicit consent of the customer and or its employees.
- Handling your payment as part of the execution of the agreed services
- To be able to call or e-mail you if this is necessary to carry out our services.

3.1. Automated decision making

SYNOTION uses in its services, among other things, systems which are set up specifically for the customer, with the aim of gaining insight into various organizational topics (such as, for example, but not limited to team effectiveness, the status and maturity of processes). SYNOTION does not, on the basis of automated processing, make decisions on matters that may have (significant) consequences for individuals. These are decisions taken by computer programs or systems, without a human being (for example, a SYNOTION employee) being involved. Prior to the survey, respondents will be informed of the privacy policy that will be drawn up together with the customer. An example is given in the appendix.

The services are based on the "PRAIORITIZE" application, a Software as a Service application developed by Transparency Lab , based in Amsterdam, Barbara Strozzi laan 201 (Zuidas), 1083 HN.

Overview of Processing of Personal Data and Processing Purposes Description of processing operations	Transparency Lab processes answers to questionnaires completed by SYNOTION customer employees. All employees have the option of completing the questionnaires anonymously.
Processing purposes:	The aim is to gain insight into various organizational issues (such as team effectiveness and the status of purchasing processes) at SYNOTION's customers.
Processing responsible:	SYNOTION or Client of SYNOTION.
Processor:	Transparency Lab B.V.
Processed Personal Data:	Name, e-mail address, team, role and/or other organizational characteristics of the Client and/or employee.
Location:	Transparency Lab B.V. te Amsterdam

3.2. Other systems

SYNOTION also uses the following computer programs or systems:

T-mobile:

Business calls are made via T-mobile. With these systems, business telephone numbers are specified on the invoices. These telephone numbers are not linked to other personal data.

Hereby their privacy statements:

<https://www.t-mobile.nl/global/media/pdf/privacy-statement.pdf>

Twinfield:

For administration and accountancy we use the Twinfield application. Their privacy policy can be found below:

<https://www.wolterskluwer.com/nl-nl/privacy-cookies>

Office 365:

For regular office applications we use O365. Here we also manage the clients. The microsoft-privacy statement can be found below:

<https://privacy.microsoft.com/nl-nl/privacystatement>

4. How long we retain personal data

SYNOTION does not retain your personal data for longer than is strictly necessary to achieve the purposes for which your data are collected. We apply the following retention periods for the following (categories of) personal data:

- Applications
- Copy of ID
- Mail Clients
- Mail prospects and suspects
- Accountancy

4.1. Applications

Personal data: mail with CV. Storage period: max. 365 days, provided explicit permission is given. If not, CV's will be saved up to a maximum of 4 weeks after the end of the application procedure. Reason: current applications and/or outsourced projects and the completion of these outsourced projects sometimes have a long duration. From the moment before the actual assignment is completed to the payment of the last fee you sometimes talk about a duration of 1 year. Once a recruitment procedure has been completed, all e-mails sent to SYNOTION from people with whom we are not going to collaborate are adequately deleted.

4.2. Copy of ID

Personal data: data on identification. Retention period: freelancers: immediately after the project, this data is safely deleted. For own staff cfm the legal requirements.

Reason: comply with legal obligations (e.g. ketenaansprakelijkheid).

4.3 Mail Clients

Personal data: name and contact details, possibly information provided voluntarily. Retention period: we retain until the end of the cooperation.

Reason: necessary in order to be able to (continue to) perform our services properly.

4.4 Mail prospects and suspects

Personal data: name and contact details, possibly information provided voluntarily. Retention period: all incoming mail traffic - as of 25 May 2018 - that has not directly resulted in a collaboration, but may in the near future lead to a fruitful collaboration, will be retained for a

maximum of 365 days after the date in the mail in question. After 365 days, these mails will be safely deleted.

Reason: the lead time for a concrete collaboration sometimes takes a long time. After 1 year without contact we see no reason to keep these personal data and therefore they will be safely deleted again.

4.5 Accountancy

Personal details: name and contact details such as telephone and email address and possibly bank account number [in case it concerns data of a ZZP-er. Storage period: the legal 7 years to be able to present the accounts].

Reason: the legal 7 years to submit the accounts.

5. The sharing of personal data with third parties

SYNOTION does not sell your information to third parties and only provides it if this is necessary for the execution of our agreement with you or to comply with a legal obligation. We enter into a processing agreement (Hosting Party and Accounting Party) with companies that process your data on our behalf in order to ensure the same level of security and confidentiality of your data. SYNOTION shall remain responsible for these processing operations.

The Bank, where we have our business account, has issued the following statement:

https://www.rabobank.nl/images/privacy_statement_ned_29703228.pdf

All parties who have a Payment Account with Bank do not have to enter into a processing agreement with the Bank, as the Bank processes payment orders of these customers, the Bank processes personal data and may do so in order to be able to execute this order; this is now the case and with the introduction of the AVG, it will remain so.

5.1 Cookies, or similar techniques that we use

No third-party tracking cookies are used on our website. SYNOTION does not use social cookies (e.g. Facebook / Twitter) to enable you to share your comments through likes, retweets and website comments.

We also use Google Analytics, which only allows us to see the number of visitors to our website. This is in accordance with the AVG. In this way, Google Analytics does not violate your privacy.

5.2. Viewing, modifying or deleting data

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent, if any, to the processing of your personal data by SYNOTION or to object to the processing of your personal data by SYNOTION and you have the right to data transfer. This means that you may submit a request to us to send the personal data held by you in a computer file to you or another organisation named by you. You may send a request for inspection, correction, deletion, data treatying of your personal data or a request to withdraw your consent or objection to the processing of your personal data to info@informed.nl. To ensure that the request for inspection has been made by you, we ask you to enclose a copy of your proof of identity with the request. In this copy, make your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and Burgerservicenummer (BSN) black. This is to protect your privacy. We will respond to your request as soon as possible, but at the latest within four weeks. SYNOTION would also like to draw your attention to the fact that you have the option of submitting a complaint to the national supervisory authority, the Personal Data Authority. This can be done via the following link:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

6. How we secure personal data

SYNOTION takes the protection of your data seriously and takes adequate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

For this technical protection of your personal data, SYNOTION makes use of ICT service providers with whom detailed agreements have been made about the applicable technical protection.

Furthermore, SYNOTION makes confidentiality agreements with its employees and, where relevant, concludes processing agreements with external parties who may gain access to personal data.

The servers for storing information (including personal data) are managed by the aforementioned ICT service providers and are all located within the EUR.

If you have the impression that your data is not properly secured or there are indications of misuse, please contact SYNOTION via email info@synotion.com

Appendix

Example of the explanation of the privacy policy in the PRAIORITIZE SaaS application as we use it with our customers.

Before the start of the question list the option to participate or not appears. It is possible to view the privacy statement, which is shown below (as an example)

"We're asking for your own name and company name in this questionnaire. These are not required to be completed. However, we do need the e-mail address to send you a link to your personal dashboard.

We also ask about your industry and your role within the organization. These are necessary in order to be able to send you a segmented, but completely anonymized, overview report later on.

If you decide to share knowledge with other readers, your e-mail address will appear in the dashboard with a few other respondents and only with a few questions. Questions where you already reach (or exceed) the target set by another reader. Questions you don't score well on will not be shared, neither will your ambition in 6 months' time. Experience shows that when another reader emails you, you can also ask yourself for knowledge. Exchanging knowledge is more fun than sharing it! And... of course, you are never obliged to answer someone's e-mail (but it is of course neat).

We use your name, email, department and role exclusively for this questionnaire. Your details will not be sold to third parties, nor will we call or spam you.

Do you have any questions about the above?

Feel free to call us! (number (delegated) client Client)