

Privacy statement

Controller and your personal data

This Privacy Statement sets out how we handle your personal data. You can be confident that we handle your personal data with due care. We, the controller of your personal data, are CoVadem Services B.V. we are located in Amsterdam at Werfkade 2, the Netherlands. The General Data Protection Regulation (“GDPR”) is applicable on this processing and we adhere to the rules set out in the GDPR.

Who is this Privacy Statement intended for?

If you are a user of our services, or if you are a participant of our program, or you just have contacted us for information on our products or services, then this Privacy Statement is for you. Furthermore, this Privacy Statement is important to all persons who visit our website or persons who have subscribed to newsletters or events, or to those who are otherwise related to us.

In that situation we will process your personal data for carrying out business with you. For example when we record and use personal data relating to you so we can inform you about the services we provide and with whom we are in correspondence. Further information concerning why we process data will be set out in this Privacy Statement.

What is personal data?

Personal data is information that says something about you. The best known forms of personal data are your name, address, email address, age and date of birth. Personal data could also include a bank account number, your phone number and for example your IP address.

What is the legal basis for our processing of your personal data?

Processing of personal data is only allowed when it is based on one of the “grounds” permitted by law. We process your personal data based on at least one of the following reasons:

Necessary for the performance of a *Contract*

Legitimate interest of CoVadem or others

Necessary for compliance with a *legal obligation*

You have given your *Consent*

For what purposes do we use your personal data?

We use your personal data to help make our operations and our services as effective, reliable and efficient as possible. This is done to provide the users with the best information as possible. We also use your personal data to keep in touch with you, to inform you about our products and services or about the agreement (when relevant). Furthermore we might use your personal data pseudonimized and (if possible) on an aggregated level for our research activities.

Use of your personal data for direct marketing purposes

We may from time to time send you information concerning our new products or services when you provided your e-mail address for such information. If you do not want to receive marketing mailings please let us know.

Use of cookies

We make use of cookies and similar technology on our websites and/or in client portals. For more details, see our Cookie Statement.

Other parties using your personal data

Sometimes it is necessary to provide your personal data to third parties. Such parties can qualify as processors. These parties process your data on our behalf. We will be and stay responsible for your personal data. For example our IT service providers qualify as such. With these parties we will arrange all legal documents necessary to make sure your data is as safe as possible and that this processing will be in line with the GDPR.

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Other third parties could receive your data as well. In that case these parties will qualify as controller itself and should adhere to all the applicable rules and regulations. Example of such third parties are competent (public) authorities.

Security

To ensure the highest possible level of protection for your information, we invest in our systems, procedures and people.

Personal data outside Europe

Personal data can be processed outside the European Economic Area (“EEA”). Additional rules apply in that case, the reason being that not all countries have the same strict data protection legislation as we do in the EEA. If we need to process your personal data outside the EEA we will make sure we implement all the necessary documents to make sure your personal data processed in line with the GDPR. In that case, we ensure that either the country has adequate equivalent protections, or that we have concluded separate agreements with those parties, and that these agreements comply with the European standard.

Retention periods of your data

As set out under the General Data Protection Regulation, we keep personal data in any event for as long as is necessary to achieve the purpose. The law does not stipulate specific storage periods for personal data. Other legislation may specify minimum storage periods, however. If it does, we are under the obligation to observe these periods. Such legislation includes tax laws or laws governing financial undertakings specifically. Another reason for which we may keep your data longer is if we become involved in a lawsuit or other legal proceedings.

What rights do you have?

You have a *right of access*, *right to rectification*, *right to be forgotten*, *right to restriction of processing* and a *right to data portability*. If you would like to use one of these rights please send as an e-mail at privacy@covadem.com.

Right to object to processing for *direct marketing* purposes

If you no longer want to receive offers for our products and services, you can unsubscribe at any time. All marketing messages include this possibility, and you can follow the link at the bottom of the marketing messages to exercise this right easily.

However, please note that this does not mean that you will not receive any e-mails anymore. Most of our mails are with information about our relation or our services contract. Unless you make explicitly clear that we should communicate by other means we will use e-mail as our default communication tool.

Do you have a complaint or a question?

Please contact us if you have any questions about this Privacy Statement or on how we process your personal data. We will be happy to help you. You can send an e-mail to privacy@covadem.com.

If you have the feeling that we did not adhere to the applicable rules then you also have the right to take your complaint to the Data Protection Authority (Autoriteit Persoonsgegevens).

Changes to the Privacy Statement

Changes to the law or our services and products may affect the way in which we use your personal data. If this happens, we will make changes to our Privacy Statement and notify you of these changes.