

# Privacy Policy and cookie statement

This is the Privacy Policy and Cookie Statement (“Statement”) of Nan Tech Solutions B.V. (Dutch Chamber of Commerce (KvK) no. 81717555), (hereafter referred to as: “NaN”, “we”, “us” or Company). NaN is a business services provider specialised in IT consultancy services, recruitment services (hereafter referred to as: “Services” and software and hardware development and exploitation.

In this Statement we explain, among other things, which personal data of which categories of persons or organisations we process and for what purpose we do so. In addition, we explain which cookies we use and why. We recommend that you read this Statement carefully.

## Modifications

This Statement may be modified by NaN at any time. The most current version of this Statement can always be found on this website. We recommend you to consult this Statement regularly so that you are aware of these modifications.

## From whom do we process personal data?

NaN processes personal data. This includes personal data of:

1. applicants or other persons who are interested in becoming an employee of NaN or wish to be hired by NaN on the basis of a service agreement (hereinafter: “Applicants”);
2. candidates who are recruited or interested to be recruited by NaN for a job at one of NaN’s Customers (hereafter: “Candidates”);
3. persons and organisations who are clients of NaN or who are employed by our clients (hereinafter: “Customers”);
4. persons and organisations from whom NaN purchases products or services or who are employed by our suppliers (hereinafter: “Suppliers”);
5. visitors to our website (hereinafter: “Website Visitors”);
6. visitors to our social media platforms (hereinafter: “Social Media Visitors”);
7. third parties, such as persons who are not Customers, but whose personal data do appear in the Services we are providing or through other business contact (hereinafter: “Third Parties”).

## What personal data do we process? For what purposes? And on what legal basis?

### 1. Applicants

We process the following personal data of Applicants:

- (a) contact and personal details, such as name and address details, telephone numbers and e-mail addresses, date of birth, place of birth, nationality, gender and other relevant data;
- (b) application details, such as CV, cover letter and other relevant data;
- (c) education, courses, internships, experience, (language) skills, references, function-related criteria, results of competency tests and other relevant data;
- (d) data relating to the nature and content of the current employment and any termination thereof;

- (e) supplementary documents: certificates of good conduct, non-disclosure agreements, certifications and other relevant data;
- (f) data for creating and sharing an Applicant's CV with Customers: first name, surname, date of birth, place of residence, nationality, profile/substantiation, relevant training and courses, relevant work experience, languages, software knowledge and other relevant data;
- (g) data for the creation of (digital) files: CVs and other documents, such as interview and meeting notes, notes, etc.
- (h) financial information: salary, bank account numbers and other financial data;
- (i) other information related to preparing the personnel, salary, and absenteeism records, such as registration number of the Company car, laptop (if provided), mobile phone (if provided), partner's and/or children's personal data for pension administration and other relevant data;
- (j) data in case of an external service provider: Company data, rates, and, in case of self-employed workers without employees, data necessary for assessing the employment relationship in the context of the Assessment of Employment Relationships (Deregulation) Act, such as number of assignments, types of assignments, duration of the assignment and other relevant data;
- (k) working abroad: personal data necessary for organising work permits, visas, taxes, housing, travel and other relevant data; and
- (l) other data that needs to be processed on the basis of, including, but not limited to, labour legislation and tax and social security legislation, such as a copy of identity documents or passports, visas, work permits, citizen service numbers and documents necessary for administrative purposes such as contact details.

The table below shows for what purposes and on what legal basis we process Applicant's personal data:

Purposes	Legal Basis
a) In order to establish the Applicant's identity and to be able to make contact regarding the application procedure	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legal obligation</li> </ul>
b), c), d) and e) The assessment of the Applicant's suitability for a vacant position.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
f) and g) to create and share the Applicant's CV and other relevant data with Customers.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
h) and i) in order to prepare the financial aspects of the Agreement	<ul style="list-style-type: none"> <li>● Legal Obligation</li> <li>● Legitimate interest</li> </ul>
j), k) and l) the implementation or application of laws or regulations and to implement the employment contracts and service contracts	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Legal Obligation</li> </ul>

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## 2. Candidates

We process the following personal data of Candidates:

- (a) contact and personal details, such as name and address details, telephone numbers and e-mail addresses, date of birth, place of birth, nationality, gender and other relevant data;
- (b) completed education, courses, internships and other relevant data;
- (c) data relating to the nature and content of the current employment and any termination thereof;
- (d) other information which may be relevant to the performance of the position the Candidate is interested in, such as information contained in a CV or the letter of application, references or the results of a competency test and other applicable data;
- (e) data for creating and sharing the Candidates' CV with Customers: first name, surname, date of birth, place of residence, nationality, profile/substantiation, relevant training and courses, relevant work experience, languages, software knowledge and other relevant data;
- (f) data for the creation of (digital) files: CVs and other documents, such as interview and meeting notes, notes, etc.
- (g) Candidates' financial data for sharing with Customers, such as salary, bank account number and other financial data; and
- (h) other data that are required or need to be processed regarding the application of the laws or regulations.

The table below shows for what purposes and on what legal basis we process Candidates' personal data:

Purposes	Legal Basis
a) In order to establish the Candidates' identity and to be able to make contact regarding the recruitment procedure	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legal obligation</li> </ul>
b), c), d) The assessment of the Candidates' suitability for a vacant position.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
e) and f) to create and share the Candidates' CV and other relevant data with Customers.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
g) in order to share the financial aspects with the Customers	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Performance of the contract</li> </ul>
h) the implementation or application of the laws or regulations	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Legal Obligation</li> </ul>

### 3. Customers

We process the following personal data of Customers:

- a) contact details, such as (company) name and address details, telephone numbers and e-mail addresses, representatives, date of birth, gender, where applicable, an identity document and other relevant data;
- b) data for the purpose of handling the Services (description of the company and its activities, culture, sector in which it operates, content of the assignment, desired vacancy profiles and other relevant data);
- c) data for the purpose of calculating and recording fees and expenses, such as bank and fee data and other financial data; and
- d) other data that are required or need to be processed with regard to the application of laws or regulations.

The table below shows for what purposes and on what legal basis we process Customer's personal data:

Purposes	Legal Basis
a) In order to establish the Customer's identity and to communicate for the purpose of providing Services to the Customer	<ul style="list-style-type: none"><li>● Performance of a contract</li><li>● Legal obligation</li><li>● Legitimate interest</li></ul>
b) Insight into the Customers' labour demand, market position, and insight into the assignment and the performance of Services	<ul style="list-style-type: none"><li>● Performance of a contract</li><li>● Legitimate interest</li></ul>
c) Receiving payment of fees, calculating or recording fees or benefits	<ul style="list-style-type: none"><li>● Performance of a contract</li><li>● Legitimate interest</li></ul>
d) the implementation or application of the laws or regulations	<ul style="list-style-type: none"><li>● Legitimate interest</li><li>● Legal Obligation</li></ul>

### 4. Suppliers

We process the following personal data of Suppliers:

- a) contact details, such as name and address details, telephone numbers and e-mail addresses, gender and other relevant data;
- b) data for the purpose of placing orders or (potential) purchasing services;
- c) data for the purpose of calculating and recording expenses and making payments, such as bank details and other financial data; and

- d) other data that are required or need to be processed regarding the application of the laws or regulations.

The table below shows for what purposes and on what legal basis we process Supplier's personal data:

<b>Purposes</b>	<b>Legal Basis</b>
a) Maintaining contact and communicating on behalf of the orders placed and (potential) services purchased	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
b) Internal business administration regarding the placing orders and (potential) purchasing services	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
c) Calculating and recording income and expenditure, making payments, carrying out financial and legal audits and other financial administration purposes.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Legal obligation</li> </ul>
d) the implementation or application of the laws or regulations	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Legal Obligation</li> </ul>

## 5. Website visitors

We process the following personal data of Website visitors:

- a) data provided by means of the contact form on our website, including, but not limited to, a name, telephone number, e-mail address, and the content of the message;
- b) data provided through another form on our website in connection with an open application, including, but not limited to a name, telephone number, email address, and the content of the message; and
- c) data relating to a visit to our website, such as visitor's statistics and other relevant collected data.

The table below shows for what purposes and on what legal basis we process Website visitor's personal data:

<b>Purposes</b>	<b>Legal Basis</b>
a) Maintaining contact and communicating about any question or other information request.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Consent</li> </ul>

b) Maintaining contact and communicating about an open application.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
c) Improving the quality of online performance of the website and thus the business exposure of NaN.	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Consent</li> </ul>

## 6. Social Media Visitors

We process the following personal data of Social Media Visitors, according to the Policies of the applicable Social Media Platforms:

- online activity on NaN's social media, such as contact details, vacancies and comments of the Social Media Visitors and other relevant data;
- NaN's response to the inquiries from Social Media Visitors such as contact details and vacancy/comments from Social Media Visitors and other relevant data;
- personal data provided by Social Media Visitors on NaN's social media, such as responses to messages/advertisements, private messages via the social media platforms and other online activity data;

The table below shows for what purposes and on what legal basis we process Social Media Visitor's personal data:

Purposes	Legal Basis
a) Maintaining contact and communicating about any question or other information request;  to generate interest in NaN and its services.	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Consent</li> </ul>
b) Maintaining contact and communicating with Social Media Visitors regarding their online activity on NaN's Social Media Channels.	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Consent</li> </ul>
c) Improving the business exposure of NaN, its website and services.	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Consent</li> </ul>

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## 7. Third parties

We process the following personal data of Third parties:

- a) contact details, such as name and address details, telephone numbers and e-mail addresses, date of birth, place of birth and gender if and to the extent that they have been made known to us;
- b) content of (electronic) messages originating from or intended for Third parties;
- c) data for the purpose of calculating and recording fees and expenses, making payments and collecting claims, such as bank details and other relevant financial data; and
- d) other data provided to us by Customer's or other Third parties or obtained from public sources in the context of the handling of a case.

The table below shows for what purposes and on what legal basis we process Third parties' personal data:

Purposes	Legal Basis
a) Maintaining contact and communicating with respect to our services.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Legal obligation</li> </ul>
b) Performance of services	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> </ul>
c) Calculating and recording income and expenditure, making payments, carrying out financial and legal audits and other financial administration purposes.	<ul style="list-style-type: none"> <li>● Performance of a contract</li> <li>● Legitimate interest</li> <li>● Legal obligation</li> </ul>
d) the implementation or application of the laws or regulations	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Legal Obligation</li> </ul>

### Processing on the basis of consent

If the processing of your personal data is based on consent, you have the right to withdraw this consent at any time. This does not affect the lawfulness of processing based on consent before this withdrawal.

### **With whom do we share personal data?**

We may share Applicants' personal data with:

- employees or executives involved in the application process; and
- other relevant parties, with consent of the Applicant (directly or through legal proxy) or if there is a legal obligation.

We may share Candidates' personal data with:

- employees, executives or Customers involved in the recruitment process; and
- other relevant parties, with consent of the Candidates' (directly or through legal proxy) or if there is a legal obligation.

We may share Customer's personal data with:

- employees or executives involved in the providing of the Services;
- Suppliers, such as NaN's accountants lawyers, and other relevant suppliers;
- relevantThird parties; and
- other relevant parties, with consent of the Customer(directly or through legal proxy), or if there is a legal obligation.

We may share Suppliers' personal data with:

- employees or executives involved in the ordering or provision of services by the Supplier; and
- other relevant parties, with consent of the Supplier (directly or through legal proxy), or if there is a legal obligation.

We may share Website visitors' personal data with:

- employees or executives involved in maintaining contact with Website visitors and disseminating information about NaN's Services and other activities;
- Suppliers, such as the party that tracks statistics for our website; and
- Other relevant parties, with consent of the Website visitor, or if there is a legal obligation.

We may share Social Media Visitor's personal data with:

- employees or executives involved in maintaining contact with Social Media Visitors and disseminating information about Nan's services and other activities;
- Suppliers; and
- other relevant parties, with consent of the Social Media Visitor (directly or through legal proxy), or if there is a legal obligation.

We may share Third parties' personal data with:

- employees or executives involved in NaN services and activities;
- Suppliers; and
- other relevant parties, with consent of the Third party (directly or through legal proxy), or if there is a legal obligation.



In the event of the disclosure of personal data to another party, we will, if necessary, enter into a (data processing) agreement with that party, that meets all the requirements of the [General Data Protection Regulation](#). We do not provide personal data to other parties for commercial purposes.

### **Do we transfer personal data to countries outside the EEA?**

Sometimes NaN has to transfer personal data to a country outside the European Economic Area (EEA). If such a situation arises and your personal data is transferred to a country which provides a lower level of protection for your personal data than countries within the EEA, NaN will put in place appropriate safeguards to protect your personal data, such as the conclusion of the EU Standard Contractual Clauses with the recipient of your personal data.

### **What security measures does NaN apply?**

When processing personal data, we maintain at all times a level of security which, considering the costs of implementation, is appropriate, among other things, to prevent unauthorised access, alteration, disclosure, loss or any other form of unlawful processing of personal data.

### **How long do we retain personal data?**

We do not retain your personal data longer than necessary for the purposes for which they are processed, unless the data must be kept longer in order to comply with legal obligations. Below are a few examples:

- Personal data of Applicants or Candidates (such as CV's) who do not currently work for and have not worked for NaN or one of its Customers in the past but who have expressed their interest in NaN: Two years after the entry date of the personal data in NaN's administration.
- Our financial records will be retained for ten years in connection with the Dutch tax retention obligation;

### **What rights do you have with regard to your personal data?**

You have the right to request NaN access to (including a copy), rectify and/or delete your personal data, to restrict the processing of your personal data, as well as the right to object to the processing or to request the transfer of the personal data you have provided to us. You can contact us for this via [gdpr@nantechsolutions.nl](mailto:gdpr@nantechsolutions.nl).

In order to prevent misuse, we may ask you to identify yourself adequately before we process your request. Circumstances may arise as a result of which we cannot, or cannot fully, comply with your request. If such a circumstance arises, we will report it to you. In principle, we will respond to your request within one month of receipt.

### **What cookies and social media buttons do we use?**

A cookie is a small text file that is sent with a page of the website and stored on the hard drive of your computer, tablet or phone via your browser. A cookie may be used to collect personal data. On the website of NaN we use the following cookies:

## **Functional cookies**

We use cookies to remember your chosen settings and entered data, so that your use of the website will be easier on your next visit.

## **Website statistics cookies**

We use Google Analytics, a service provided by Google Inc. Google Analytics is a web analysis service that uses cookies to analyse how you use the website. The cookies are used to store visitor information, such as the time at which the website was visited, whether the Website visitor has visited the site before and through which website the Website visitor came to our website.

## ***Social media buttons***

Our website includes buttons to share, 'like' or promote web pages on Social Media Platforms such as Facebook, LinkedIn, Twitter and others. These buttons work through pieces of code that come from these social media providers themselves. By means of this code cookies are placed.

NaN is not responsible nor liable for the way in which these social media providers handle your (personal) data. We therefore advise you to consult the privacy and cookie policies of these providers if you want to make use of the button on our website.

## **Reject and delete cookies**

You can decide for yourself whether to accept or reject cookies or whether you want your browser to notify you when a cookie is placed. To do this, you need to adjust the settings in your browser.

You always have the possibility to remove cookies already placed on the hard drive of your computer, tablet or phone. In addition to rejecting cookies via your browser, you can also install the Google Analytics [Opt-out Add-on](#) in your browser, or similar tools, depending on your browser. This prevents Google Analytics from collecting information about your website visits.

## **Do you have any questions, remarks or complaints?**

NaN will be happy to help you if you have any questions, comments or complaints regarding this Statement. You can do so by contacting us via the contact details provided below. You also have the right at all times to lodge a complaint with the [Dutch Data Protection Authority](#), or if you live or work in another country, to the supervisory authority of that country.

### **NaN Tech Solutions B.V.**

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