

# Privacy Statement



In this privacy statement KWPS B.V. (hereinafter: KWPS, "we" or "us") informs you how we process your personal data you provide us or we obtain through our website(s). This privacy statement was last modified on May 16, 2019. We may change the privacy statement from time to time. We encourage you to review this privacy statement regularly.

## About KWPS

KWPS is the controller for the processing of your personal data within the meaning of the General Data Protection Regulation ("GDPR"). In a number of exceptional cases, however, KWPS is the processor of your personal data and its client is the controller within the meaning of the GDPR.

KWPS is located at Strawinskylaan 1115, 1077 XX in Amsterdam. For questions you can reach us via [info@kwps.nl](mailto:info@kwps.nl).

## Who does this privacy statement apply to?

This privacy statement applies to the processing of personal data by KWPS. We process personal details of (potential) clients, relations and referrers, suppliers, job applicants, recipients of our communications (such as newsletters and invitations to events) and students (in the context of internships and / or student events).

## Which personal data do we process and for what?

We process personal data for the implementation of our pension and HR advisory practice, for recruitment and selection purposes, for organizing events, sending newsletters, invitations to events, improving our services and to comply with laws and regulations. We can also process personal data for improving our website. If necessary, we ask you for permission.

We process, among other things, the following personal data:

- name, address, place of residence;
- telephone number, e-mail address;
- information contained in our files;
- other personal data provided by you, such as CVs.

We may combine the information we have collected from you with the information we have obtained from other sources. This allows us to improve the overall accuracy and completeness of the information and to better tailor our contact with you.

## Basis of the processing

In order to be able to process your personal data, the processing must be based on one of the foundations from the GDPR. In the case of KWPS this is - depending on the specific personal data - based on entering into and executing the engagement with our clients and our suppliers, a legal obligation, a legitimate interest or permission.

## How long will your personal data be stored?

We will not store your personal data longer than necessary for the purposes for which we use your personal data. Some data must be stored for a certain period of time by law. We therefore use at least the statutory retention periods for all personal data received. In addition, we use the retention periods prescribed by professional associations.

## To whom does KWPS provide personal data?

In order to provide you with our services, we use services from other parties that process personal data on our behalf. If we commission a third party to process personal data on our behalf, we will conclude a written processing agreement with this party (the 'processor'). In this we make agreements about, among other things, the purpose, the duration and the scope of the processing, the retention periods and the security measures.

In certain occasions we are legally obliged or a judge forces us to provide personal data to a third party. Sometimes it is necessary for us to provide information to insurers, consultants and other suppliers and parties involved.

## Processing personal data outside the EU

KWPS processes your data only within the European Union. The GDPR applies in all countries of the European Union. If we enable processors, we also require that they store personal data on servers in the European Union. Insofar as this is not possible, we take the necessary measures to

provide an adequate level of protection for the protection of your personal data.

### Your options and rights

If we process data from you, you have the right, under the circumstances mentioned in the GDPR, to view it and have it corrected, removed or restricted. You can also file an objection for certain cases provided by the GDPR or request for the transfer of your personal data. You can address all these requests to [info@kwps.nl](mailto:info@kwps.nl). We will process your request.

Inspection and correction: If you want to know whether we process your personal data or want to change your personal data, you can contact us. We can ask you to identify yourself first.

Delete: The GDPR offers, under certain circumstances, the possibility to have personal data deleted. We will assess whether the request can be executed after a request. In some cases we have to keep your personal data, for example on the basis of tax or legal obligations or to ensure that you do not receive any e-mails from us.

Restrict: You can contact us with a request to limit the processing of your personal data if you feel that your personal details are incorrect, the processing of them is unlawful, you need them for a legal claim or you have objected to the processing thereof.

Objection: If we process your personal data on the basis of a legitimate interest, you can, for your specific reasons, object to further use of your personal data, for example for further marketing purposes such as sending mailings.

Objection to newsletters and invitations to events: If you do not want to receive newsletters and/or invitations to events via e-mail or other electronic messages, you can unsubscribe yourself through the unsubscribe option in the received message. You can also unsubscribe by contacting us.

Data transfer: You are entitled to data transfer (data portability) if the processing of the data on which the request relates is based on permission or the execution of an agreement and the processing is carried out by automated processes.

### Cookies

The website of KWPS uses Google Analytics. KWPS has signed a processor agreement with Google for this use and has set up Google Analytics in a privacy-friendly manner. This privacy-friendly setting means that KWPS has masked the last octet of your IP address, has disabled 'data sharing with Google' and is not using other Google services in combination with the Google Analytics cookies.

### Questions or complaints?

If you have questions about the way we process your personal data, please let us know. We will gladly assist you.

You can always submit a complaint to the Dutch Data Protection Authority.