

## **PRIVACY STATEMENT – ValueBlue**

*Version 1.0 – 20 January 2021*

### **1. ValueBlue**

We are ValueBlue B.V., a Dutch company that trades under the name "Value Blue".

We operate in the European Economic Area (EEA) and we store our data on servers in the EEA, unless we indicate otherwise in this privacy statement.

### **2. General**

In this privacy statement we summarize which data we process about you and how we process it.

We may change provisions of this privacy statement. If we do that, we will let you know. Nevertheless, we recommend that you periodically check yourself whether the privacy statement has been changed.

### **3. Which personal data do we process?**

If you use our services or visit our websites, we may process your personal data. Below we explain per role which personal data we may collect from you, why we process it and how long we store it.

#### **3.1 You use BlueDolphin**

A. In order to be able to offer you our service 'BlueDolphin' and to make the service workable for you, we process the personal data mentioned below up to 13 months after your account has been terminated. We use the data to create an account for you, to authorize you and to correspond with you about the service and your questions. Our processing basis is the performance of an agreement.

- Name
- E-mail address
- Phone number
- Content of any communications you have with us
- Function
- Organization
- User ID
- Session ID
- BlueDolphin tenant name
- Password (encrypted)
- Role within the BlueDolphin software
- Powers and rights within the BlueDolphin software
- Language
- Information about the customer's IT architecture, its processes and data

If you contact us via the Intercom chat function, your data may be stored by our processor Intercom outside the EEA. Intercom guarantees to comply with European privacy legislation.

B. To secure our service, we process the personal data mentioned below up to 2 years after collecting it. Our processing basis is our legitimate interest to be able to adequately secure the service.

- Name
- E-mail address
- IP address
- Date and time of logging in and out
- Role within the BlueDolphin software
- Powers and rights within the BlueDolphin software

C. To improve our services, we process the personal data mentioned below up to 2 years after collecting it. Our processing basis is our legitimate interest to be able to improve our services. Your interests are safeguarded because the data processing is limited.

- Name
- User ID
- Session ID
- BlueDolphin tenant name
- IP address
- Browser information
- Location data (country / province level)
- Actions performed on BlueDolphin
- Using BlueDolphin and problems encountered
- Language
- Device information
- Internet Service Provider (ISP)
- Length of the session

The above data can be shared with our processor DynaTrace (the provider of our analytical software). They can store data outside the EEA, but guarantee that they continue to comply with European privacy legislation.

D. If you use BlueDolphin, we can send you marketing material such as newsletters and offers. To this end, we process the data mentioned below up to 4 years after we last had contact with you or, if that is later, you last performed an action on BlueDolphin. Our processing basis is our legitimate commercial interest to be able to inform you about other services we offer. Your interests are safeguarded by giving you the option to unsubscribe from receiving marketing material.

- Name
- E-mail address
- Phone number
- Content of communications you have with us
- Function
- Organization
- User ID
- Browser ID
- IP address
- Browser information
- Location data (country / province / city level)
- Role within the BlueDolphin software
- Actions performed on and use of BlueDolphin
- Language
- Demographic data
- Your personal lead score

You can unsubscribe from these newsletters by following the unsubscribe instructions included with each newsletter. If you unsubscribe from the newsletter, it will not affect our ability to send you emails about important matters and your account.

E. If you use BlueDolphin, you can choose to fill in optional fields voluntarily. If you do this, we will process the entered data based on your consent. You have the right to withdraw this consent at any time by clearing the completed fields or by contacting us as described at the end of this privacy statement. This concerns the following data.

Improving our services, processed up to 2 years after collection:

- Name (via completed questionnaires)

- Function (via completed questionnaires)
- Organization (via completed questionnaires)
- Reviews given (processed for up to 13 months after account termination)

Other:

- Profile photo, for personalizing the personal profile, processed up to 13 months after termination of the account

### 3.2 You are a visitor to our website

A. To ensure that you can use our website, we process the personal data mentioned below during your visit to our website. Our processing basis is our legitimate interest to be able to show you a website that works.

- Language

This information can be shared with LinkedIn to set the language preference correctly. LinkedIn may process the data in the U.S., but uses standard contractual clauses approved by the European Commission.

B. To improve our websites, we process the personal data mentioned below up to 2 years after collecting it. Our processing basis is our legitimate interest to improve our websites. Your interests are safeguarded because data processing is limited and you can choose not to share the data by unchecking the "analytical cookies" box.

- Browser information
- Location data at country / province level
- Google user ID
- Hotjar ID
- Device information
- The duration of your website visit and how you use our websites
- Demographic data

The above data can be shared with Google Analytics, which can store data outside the EEA but guarantees to continue to comply with European privacy legislation.

C. We place tracking and advertising cookies if you visit our website and give us permission to do so in the cookie notification. The cookies process the information mentioned below up to 2 years after the collection of the data.

- IP address
- Device information
- The duration of your website visit and how you use our websites
- Google advertising ID
- Browser ID
- Hubspot user ID
- Demographic data

The tracking cookies are placed by Hubspot, Google and LinkedIn. They can store the data outside the EEA, but guarantee to comply with European privacy legislation.

D. If you ask us a question or make a request, we will process the personal data listed below up to 4 years after we last had contact with you. We process your data to be able to respond to your question or request and to improve our services. Our processing basis is our legitimate interest to be able to respond to your questions and requests and to improve our services.

- Name
- E-mail address
- Phone number
- Content of any communications you have with us
- User ID
- Organization
- Language
- Conversation assessment (to improve our services)
- Date of registration and first visit (to improve our services)
- Date of last seen and last contact (to improve our services)
- Number of active web sessions (to improve our services)

We store the above personal data at Intercom. This party stores your data outside of the EEA, but they guarantee compliance with European privacy legislation.

- E. If you register yourself for a newsletter on our website, we will process the data mentioned below until you unsubscribe from the newsletter. Our processing basis is consent, because you voluntarily sign up for the newsletter.

- Name
- E-mail address

You can unsubscribe from these newsletters by following the unsubscribe instructions included with each newsletter. If you unsubscribe from the newsletter, it will not affect our ability to send you emails about important matters and your account.

### **3.3 You apply for a job at Value Blue**

- A. If you apply for a job at Value Blue, we will process the personal data mentioned below up to 4 weeks after completing the application or up to 1 year if you request it. Our processing basis is our legitimate interest to process your application.

- Name
- Address
- E-mail address
- Phone number
- Your employer
- Your function
- Curriculum vitae and motivation letter
- Information about your availability and employability for work
- Information provided in the appropriate open fields and information you provide to us during an interview

### **3.4 If you work for a party with whom we intend to enter into a business relationship (prospects)**

- A. We approach interesting parties, such as potential customers, with the aim of establishing a business relationship with them. If you act as contact person for such a party, we will process the personal data mentioned below up to 4 years after we last had contact with you. We will only process the data if you have given us permission to do so.

- Name
- E-mail address
- Phone number
- Content of communications you have with us
- Function
- Organization

- IP address
- Browser ID
- Browser information
- Location data at country / province level
- Language
- Device information
- The duration of your website visit and how you use our websites
- Demographic data
- Your personal lead score

## **4. Sharing your personal data**

### 4.1 Our data processors

We may ask others to assist us in providing our services and websites. These "processors" can therefore process your personal data on our behalf. We agree with these processors that they may only use your personal data to enable our services.

We use the following types of processors:

- parties that host our services and websites, store data and manage and maintain our servers and databases;
- developers and suppliers of software and questionnaires;
- research agencies and analytical software suppliers to improve our services;
- ticket managers for user support;
- marketing agencies, and;
- providers of relationship management software.

### 4.2 Sharing your personal data with third parties

We only share your personal data with third parties if this:

1. is described in this privacy statement and we have a valid basis for this;
2. is reasonably necessary or appropriate to comply with legal obligations;
3. is necessary to comply with legal requests from authorities;
4. is necessary to respond to any claims;
5. is necessary to protect the rights, property or safety of us, our users, our employees or the public;
6. is necessary to protect ourselves or our users from fraudulent, offensive, inappropriate or unlawful use of our services.

We will notify you immediately if a government agency makes a request relating to your personal data, unless we are not allowed to do so by law.

Our websites may also contain links to websites of others. If you provide your personal data on these third party pages, the privacy policy of this third party applies. We are not responsible for the content of the privacy policy of these parties and the way in which these parties process your personal data. We encourage you to review their privacy policy before providing any personal information to them.

## **5. Protection of your personal data**

We have taken appropriate technical and organizational security measures to protect your personal data. We have in any case taken the following measures:

- We have physically and digitally secured our servers so that people cannot view your personal data without our consent.
- We use security to ensure that data is sent encrypted between our services, the websites and our servers.
- We make backups of your personal data.
- Vulnerabilities in the services and on the websites are addressed as quickly as possible.

- We have implemented physical and electronic measures designed to prevent unauthorized access, loss or misuse of personal data as much as possible.
- We store your passwords encrypted.

We would like to point out that the internet is never completely secure. So be careful what you share via the internet. If in doubt, contact us first.

## **6. Your rights**

You have certain rights regarding your personal data. The rights that we describe below are not absolute rights. We will always consider whether we can reasonably meet your request. If this is not possible, or if it would, for example, be at the expense of the privacy of others, we can refuse your request. If we refuse a request, we will let you know with reasons.

### Right to access and transfer data

You have the right to request which personal data we process about you. You can also ask us the following:

- to provide insight into the reasons why we process your personal data;
- what types of personal data we process about you;
- what types of parties we share your personal data with;
- how long we store your personal data;
- where the personal data comes from, and;
- whether we use automated decision-making.

You may also request a copy of your personal data processed by us. Do you want additional copies? Then we can charge a reasonable fee for this.

### Right to rectification

If the personal data processed by us is incorrect or incomplete, you can request us to adjust or supplement your personal data.

If we approve your request, we will, insofar as this is reasonably possible, inform the parties to whom we provide data.

### Right to erasure of data

Do you no longer want us to process certain personal data about you? Then you can request us to delete some or all of your personal data.

If we have accidentally processed data unlawfully or a specific law prescribes that we must delete data, we will delete the data. If the data is necessary for the settlement of a legal procedure or a (legal) dispute, we will only delete the personal data after the procedure or dispute has ended.

If we approve your request, we will, as far as is reasonably possible, inform the parties to whom we provide data.

### Restriction of processing

If you think that we are not processing the correct personal data about you, or if you believe that we are processing your personal data unlawfully or no longer need it, you can request us to restrict the processing of that personal data. For example, during the time that we need to assess your request, or if there is no lawful basis (anymore) but you still have an interest in us not deleting the personal data yet. If we restrict the processing of your personal data at your request, we may still use that data for the settlement of legal proceedings or a (legal) dispute.

### Automated individual decision-making

We do not make decisions based solely on automated processing.

### Withdrawal of consent

You may withdraw your consent at any time by clearing voluntarily completed fields or by contacting us. Our contact details are described below.

### Exercising your rights

You can send the above requests to [support@valueblue.nl](mailto:support@valueblue.nl).

Before we respond to your request, we must first make sure that it is your personal data. We usually do this by having you log in to your BlueDolphin account. If you do not have an account or if we cannot confirm your identity in this way, we will try to verify your identity by email or telephone. If that also fails, we can ask for a copy of a valid ID. In that case, do not forget to shield your social security number (BSN), MRZ (Machine Readable Zone) and passport photo.

We aim to deal with your request or complaint within one month. If it is not possible to make a decision within one month, we will notify you of the reasons for the delay and when the decision is expected to be provided. This can never be longer than 3 months after receipt of the request.

### Dutch Data Protection Authority / Autoriteit Persoonsgegevens

Do you have a complaint about our processing? Then contact us. We would of course be happy to help you. Should we nevertheless not come to an agreement, you also have the right to file a complaint with the privacy supervisor, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can contact the Dutch Data Protection Authority via <https://autoriteitpersoonsgegevens.nl/>.

## **8. Contact**

If you have any questions, concerns or comments about this privacy statement, please contact us by email at [support@valueblue.nl](mailto:support@valueblue.nl).