

Privacy and cookie statement Sttella

Sttella creates innovation solutions for understanding someone's life potential. The Ingeniums[®] program developed by Sttella which ensures better matches of the right personnel for the right position and offers help with the orientation of study choice.

Sttella's services are offered via the website <u>https://ingeniums.nl</u>. When you purchase a service from us, sign up for our newsletter or visit our website, your personal data will be processed. In this privacy and cookie statement you can read which personal data we keep, what its purpose is, with whom the data is shared, how long it is kept, how it is secured and what your rights are.

Responsible for the processing

Sttella Marsstraat 97 9742 EM GRONINGEN Chamber of commerce-nummer: 72552379

If you have any questions, please contact us via info@ingeniums.nl.

Personal data that we process:

When you contact us:

- Company name of sole proprietorship or limited liability partnership;
- Business address of sole proprietorship or limited liability partnership;
- Name of contact person at companies;
- Private customer name;
- Phone number;
- •E-mail address;
- Social media account name if you contact us at social media.

When you purchase a service from us:

- Company name of sole proprietorship or limited liability partnership;
- Business address and location sole proprietorship or limited liability partnership;
- Name of contact person at companies;
- Chamber of Commerce number of sole proprietorship or limited liability partnership;
- Private customer name;
- Private customer's home address and place of residence;
- •Date of birth;
- Phone number;
- •E-mail address;
- Bank account number when we check payments;
- Customer and invoice number;
- Other personal data that you actively provide to us.

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When you visit our webside:

•IP address;

- Visiting behavior website;
- Information about how website visitors use our website.

We do not process any special and/or sensitive personal data.

How do we obtain the personal data:

We obtain your personal data from you via e-mail, telephone or when you visit our website.In company sales, we will obtain information from the Trade Register of the Chamber of Commerce.

Why do we process personal data:

We only process personal data if this is permitted by law and only for the following purposes:

- Execution of the agreement
 - To be able to create an account;
 - To be able to communicate with you;
 - To be able to perform the service;
 - To be able to send the results by e-mail;
 - For creating and sending the invoice;
 - For handling payments;
 - To be able to inform you about changes in the service.
- Respond to your question or request

When you contact us by phone or email.

• Keeping track of website statistics

To make our website work better, to make searches on the website easier, to improve our service and to adapt it to the wishes of the website visitor. For this we use the legal basis of legitimate interest.

• Legal obligation

To comply with the statutory administration obligation of the Tax and Customs Administration.

Send newsletter

To be able to send you our newsletter if you have registered for this or if you are a customer with us. Under each newsletter you will find an option to unsubscribe. The legal basis for sending the newsletter under your consent.

Posting reviews

To be able to share customer reviews on our website and social media channels. We only do this if you have given permission for this in advance. The legal basis for posting reviews under your consent.

We have weighed our interest in processing personal data against your privacy and in all cases we Will not process more data than its necessary to achieve the above goals.

How long do we keep your personal data:

We will not store the data that we obtain from you for longer than its necessary to achieve the above goals. In all cases, the following retention periods apply to the data:

• Data on invoices, customer data and payment data are kept for a minimum of seven (7) years for the legal administration obligation;

• Communications such as e-mails, in which agreements are made, are kept for five (5) years as this is the statutory limitation period for claims for compensation and these data can serve as evidence;

- Accounts are kept as long as the subscription is used;
- Website statistics (Google Analytics) are kept for fifty (50) months;
- Reviews will only be removed if you submit a request for removal;

• You can unsubscribe from the newsletter at any time. Under each newsletter you will find an option to do so.

With whom do we share the personal data?

It goes without saying that we do not sell or rent your data to the third parties. Your data will only be shared with third parties if this is necessary to achieve the goals described in this privacy and cookie statement. We have made agreements with companies that process your personal data for us to ensure that they handle your data confidentially and properly secured.

For the performance of our services and business activities, we work together with the following parties:

- Hosting party website;
- Software supplier website;
- Software supplier program;
- •Website builder;
- Software supplier e-mail;
- Email provider;
- Party for sending the newsletter;
- Telephone provider;
- Google Analytics for tracking website statistics;
- Accountant;
- Software supplier accounting package;
- Online payment service
- •Banks;
- Tax and Customs Administration if they want to inspect our records.

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Your data will not be shared with parties located in countries outside the European Economic Area (EEA). An exception to this, there are number of parties, such as Google and the online payment service, use a server and/or cloud storage in the United States.

How do we secure your personal data?

We take the processing of your personal data seriously and we take appropriate measures to prevent misuse, loss and other forms of unlawful processing.

The use of good security software and the encryption of sending personal data via my website (SSL connection) are examples of these measures.

If you believe that your data is not properly secured or if you have indications that your data is being misused, you can send an e-mail to <u>info@ingeniums.nl</u>.

Cookies

We use cookies for the best possible functioning of our website. These are small text files that are stored in the browser of your computer, smartphone or tablet when you first visit our website.

When you visit our website again, the information stored in the cookie can be sent back to us. With the help of cookies we can see how our website is used and how we can make the website more user-friendly.

<u>Cookie notice</u>

When you visit our website for the first time, a cookie notification appears in the form of a pop-up. As soon as you click on 'Accept all', you give us consent on using all types of cookies and similar techniques. If you choose not to Then you can click on 'refuse' or indicate your choice at 'view preferences'.

Functional cookies

By placing functional cookies, we ensure that you can visit our website more easily. You do not have to enter the same information every time because your user preferences will be saved. No permission is required to place functional cookies because these cookies do not infringe your privacy.

Analytical cookies

We have installed Google Analytics to obtain the number of visitors to our website and the way our website is used. Cookies from Google are therefore placed on our website. These analytical cookies have little impact on your privacy because the IP address that is collected is partially masked. For example, that IP address can no longer be traced back to the website visitor.

Google will not use the data collected for their own purposes. We have agreed this with them in a processing agreement. For more information about this, you can consult Google's Privacy Policy.

<u>Social media</u>

To make it easy for you to contact us at social media, our website contains an Instagram button. This button works through pieces of code that come from Instagram itself. Cookies are placed by means of these codes. We have no influence on that. You are therefore advised to consult Instagram's Privacy Policy for more information.

These are the cookies and similar techniques that are placed:

Name	Purpose	Save
XSRF-TOKEN	is necessary for the security of the website	1 day
ingeniums_session	is necessary for the security of the website	1 day

Disable and delete cookies

If you do not want us to place cookies, you can disable and delete cookies in the browser settings of your computer. You can also choose that certain cookies may not be placed. Finally, you can determine your choice in the cookie notification. By disabling and/or removing cookies, our website may no longer work optimally.

Privacy rights

Because we process your personal data, you have the right to view, change or have this data removed. You can request us to limit the processing of your personal data in case the data is incorrect, the processing is unnecessary or the processing is unlawful.

You can also request us to send you the personal data that we process about you so that you can transfer it to another party. You can also object to the processing of your personal data. Finally, you can withdraw the consent you have given us to process your personal data.

If you wish to use these rights, please send your request by e-mail to <u>info@ingeniums.nl</u>. We may ask you for identification, so that we are sure that the request has been made by you.

When you enclose a copy of your proof of identity, we request that you make the passport photo, the strip with numbers at the bottom of the passport, the passport number and the citizen service number (BSN) black, for example by using the Copy ID app of the central government. This is to protect your privacy.

Finally, you have the option of submitting a complaint about data processing to the Dutch Data Protection Authority via <u>www.autoriteitpersoonsgegevens.nl</u>.

Amendments

This privacy and cookie statement was last amended on December 1, 2022. In the event that our working method changes, we will be forced to adjust this privacy and cookie statement. The new privacy and cookie statement is always published on our website.