

# Privacy Statement of Swardly BV

29 September 2020

During the processing of personal data Swardly BV works conform the requirements of the applicable data protection legislation, like the General Data Protection Regulation. This means we:

- **clearly specify our purposes** before we process personal data, by using this privacy statement;
- **limit our collection of personal data** to only the personal data needed for legitimate purposes;
- first **ask for explicit permission** to process your personal data in cases where your permission is required;
- take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **respect** your right to access, correct or delete your personal data held by us.

Swardly BV is the party responsible for all data processing. In this privacy statement, we will explain what kind of personal data we collect and for which purposes within our online service <https://swardly.com>. We recommend that you read it carefully.

If you have any questions regarding the processing of personal data, you can find the contact details of Swardly BV at the end of this privacy statement.

## Registration

Certain features of our service require you to register beforehand. You will have to provide some information about yourself and choose a username and password for the account that we will set up for you.

For this purpose, we use your name and address details, phone number, invoice address, email address, payment details, birth date and profile picture. We do this on the basis of your consent. We store this information until you close your account. We will retain this data so that you do not have to re-enter it every time you visit our website, and in order to contact you in connection with the execution of the agreement, invoicing and payment, and to provide an overview of the products and services you have purchased from us.

## Handling your order

We will use your personal data when handling your order. We may share your data with the delivery service to have your order delivered. We may also obtain information on your payment from your bank or credit card company.

For this purpose, we use your name and address details, invoice address, email address and payment details. We do this on the basis of your consent. We store this information until your order has been completed. Certain types of personal data will be retained for a longer period with regards to the legal tax retention. (the legal retention period).

## Providing to Third Parties

We collaborate with other organisations, that may receive your personal data.

To handle your orders, we work together with:

- Our payment provider Mollie

### **Sending newsletters**

We have a newsletter to inform those interested on news, tips and information about our products and services. Your e-mail address is automatically added to the list of subscribers.

For this purpose, we use your name and address details and email address. We do this on the basis of your consent. We store this information until you cancel your subscription.

You may cancel your subscription to our newsletter at any time. Each newsletter contains a link to unsubscribe from our newsletter.

### *Providing to Third Parties*

We collaborate with other organisations, that may receive your personal data.

To handle your newsletter, we work together with:

- Digitale dienst Mailchimp

Of these parties, Mailchimp is established outside the EU.

### **Access to portal**

Within our portal, you can access a management environment where you can set, specify and change settings. We will keep track of your activities for proof.

For this purpose, we use your name and address details and email address. We do this on the basis of your consent. We store this information until our services to you have ended.

### **Buy credits**

Via <https://swardly.com> you can buy credits to use certain functionalities. We use your personal data to complete the transaction and to register the credits.

For this purpose, we use your name and address details, invoice address, email address and payment details. We do this on the basis of your consent. We store this information until your order has been completed. Certain types of personal data will be retained for a longer period with regards to the legal tax retention. (the legal retention period).

### *Providing to Third Parties*

We collaborate with other organisations, that may receive your personal data.

### **Contact form**

You can use our contact form to ask questions or make any request.

For this purpose, we use your name and address details, phone number and email address. We do this on the basis of your consent. We store this information until we are sure that you are satisfied with our response.

### **Promotion**

Other than the advertisements on the website, we can inform you about new products or services:

- by mail
- by e-mail
- via social media

You can object at all times against this promotional communication. Every letter contains instructions on how to do this. Also, every e-mail contains a cancellation link. On social media, you can block us or use the cancellation option. You can also inform us through your account. Further, you can inform us through the portal.

### **Advertisements**

Our online service shows advertisements. We do not publish these ourselves, but we collaborate with advertising companies. These companies keep track of what you like, and use that information to only show or make nice or interesting advertisement or offers in the future.

### **Providing data to third parties**

Except for the parties necessary to deliver the above mentioned services, we do not under any circumstance provide your personal data to other companies or organisations, unless we are required to do so by law (for example, when the police demands access to personal data in case of a suspected crime).

Our website features social media buttons. These buttons are used by the providers of these services to collect your personal data.

### **Statistics**

We keep statistics on the use of our online service, giving us access to individual data. However, we only access individual data insofar as necessary for the purposes set out in this statement.

### **Cookies**

Our online service makes use of cookies. Cookies are small files in which we can store information, so that you do not have to fill in that information again. We can also use them to see whether you are visiting us again.

The first time you visit our online service, we will show you a notification explaining our cookies and ask for your permission for the use of these cookies.

You can disable the use of cookies through your browser setting, but some parts of our website may not work properly as a result of that.

### **Security**

We take security measures to reduce misuse of and unauthorized access to personal data. We take responsibility in the security of your personal data. We renew our security measures to ensure safe storage of personal data and keep track what might go wrong.

### **Data protection officer**

We have appointed a so-called *data protection officer*. This person is responsible for privacy matters within our organisation. Our data protection officer is Stef Rouschop and is available by e-mail (stef.rouschop@involved.group) or phone (0857430023) for all your questions and requests.

### **Changes to this privacy statement**

We reserve the right to modify this statement. We recommend that you consult this statement on a regular basis, so that you remain informed of any changes.

**Inspection and modification of your data**

You can always contact us if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data.

You have the following rights:

- Right of access: you have the right to see what kind of personal data we processed about you;
- Right of rectification: you have the right to rectify any personal data we have processed about you, if this information is (partially) wrong;
- Right to complain: you have the right to file a complaint against the processing of your personal data by us, or against direct marketing;
- Right to be forgotten: you can file a request with us to remove any personal data we have processed of you;
- Right to data portability: if technically possible, you have the right to ask us to transfer your processed personal data to a third party;
- Right to restriction of processing: you can file a request with us to (temporarily) restrict the processing of your personal data.

If you exercise any of the rights mentioned above, we might ask to identify yourself with a valid ID, to confirm it is your personal data. If so, it is important that you hide your social security number and photo.

We will usually respond to your request within 30 days. This term can be extended if the request is proven to be complex or tied to a specific right. You will be notified about a possible extension of this term.

**Complaints**

If you want to file a complaint about our use of personal data, please send an email with the details of your complaint to [info@smardly.com](mailto:info@smardly.com). We will look into and respond to any complaint we receive.

If you think that we are not helping you in the right way, you have the right to file a complaint at the authority. For The Netherlands, this is the Autoriteit Persoonsgegevens.

**Contact details**

Smardly BV  
Overhoven 5  
6136 EA Sittard  
[info@smardly.com](mailto:info@smardly.com)  
31857430023