

## **PRIVACY STATEMENT ATLAS CONCEPTS B.V.**

### **1. INTRODUCTION AND SCOPE**

This is the privacy statement of Atlas Concepts. With this privacy statement we explain how we handle your personal data. We think it is very important that your personal data is handled with care. When processing your personal data Atlas Concepts takes into account the General Data Protection Regulation ("GDPR") and the resulting laws and regulations. By personal data we mean all data that can be traced directly or indirectly to a natural person. This natural person is referred to in the GDPR as the person concerned.

This privacy statement applies to processing of all online and offline types of personal data that Atlas Concepts receives from:

- (potential) suppliers, (potential) customers, contractors, clients and other relations of Atlas Concepts;
- visitors to the website of Atlas Concepts (<https://www.atlasconcepts.nl>) or a domain name associated with this domain name.

### **2. WHAT PERSONAL DATA CAN WE PROCESS?**

Atlas Concepts can process the personal data below, based on the legal basis of the GDPR:

#### Personal data provided by yourself:

- contact details (name, address, place of residence, email address, telephone number(s), IP address);
- identity data;
- payment details (bank account number, credit card number);
- personal data you may provide us for the purpose of a job application, such as your full name, date of birth, address, phone number, nationality, marital status and any other personal data set out in your application.

#### Personal data obtained through communication instruments, such as the website, newsletters and email:

- contact details (as described above);
- information with which device you have visited our website, such as an IP address;
- your surfing behavior on the website, such as:
  - o which data/web pages you have viewed from us;
  - o the way you navigate through the website;
  - o whether you open a newsletter or email and on which parts you click;
  - o the dates and times of the visit to the website;
- the operating system you use;
- your geolocation;
- the data submitted to Atlas Concepts;
- the data downloaded from the website.

#### Personal data obtained from other sources:

- data available through public sources, such as but not exclusively social media;
- personal data obtained from the Trade Register and from the Land Registry;
- personal data available on public business websites.

### **3. LEGAL BASIS FOR PROCESSING**

Atlas Concepts processes your personal data on one or more of the following legal grounds:

- you have given permission to Atlas Concepts to process your personal data for one or more specific purposes;
- the processing is necessary for the execution of an agreement to which you are a party, or to take measures at your request prior to the conclusion of an agreement;
- processing is necessary to comply with a legal obligation resting on Atlas Concepts;
- the processing is necessary for the defense of a legitimate interest of Atlas Concepts or of a third party, unless the interests or rights of the person concerned outweigh the legitimate interest of Atlas Concepts or the third party.

#### **4. GOALS FOR PROCESSING**

Atlas Concepts processes your personal data for the following purposes:

- to provide our services;
- to comply with our legal and regulatory obligations;
- to inform you of products and services of Atlas Concepts;
- to approach you for newsletters, only if you have registered for this (opt-in);
- to manage, secure, adapt and improve the website and related technologies;
- to verify your identity;
- for marketing/commercial purposes;
- for recruitment and selection.

#### **5. SHARING WITH THIRD PARTIES**

Atlas Concepts may share your personal data with any company belonging to the group, for the purposes described in this privacy statement. In some cases we may also share your personal data with third parties. This may include, but is not limited to:

- third parties relevant to the services that we provide, such as subcontractors and/or carriers;
- third parties that we engage with, such as supervisory authorities and other bodies, in order to comply with legal obligations;
- third party suppliers in connection with the processing of your personal data for the purposes described in this privacy statement, such as IT providers, communication service providers or other suppliers to whom we outsource certain support services.

Atlas Concepts will only transfer your personal data to the above mentioned third parties for the purposes and on the legal grounds stated in this privacy statement. Atlas Concepts will not sell your personal data to third parties.

To the extent that a third party processes your personal data as a data processor of Atlas Concepts, Atlas Concepts will conclude a processor agreement with such party that meets the requirements set out in the GDPR.

Atlas Concepts may as result of a merger, acquisition or sale of (part) of its business share your personal data with the party (parties) involved in such merger, acquisition or sale of (part of) its business. Of course we will inform you about this via email and/or a clearly visible announcement on our website and inform you about your rights in this respect.

#### **6. TRANSFER OF PERSONAL DATA WITHIN AND OUTSIDE THE EUROPEAN ECONOMIC AREA**

Atlas Concepts is an international organization with cross-border business processes, management structures and technical systems. This privacy statement and our practices are intended to provide a consistent level of protection of personal data internationally. Because of the international nature of Atlas Concepts it may be necessary to pass on your personal data to suppliers, potential or actual buyers, sellers or other business partners located outside the European Economic Area ('EEA').

In accordance with articles 44-49 GDPR, Atlas Concepts will transfer your personal data to other countries outside the EEA only:

1. if the European Commission has decided that the third country guarantees an adequate level of protection, or
2. if appropriate safeguards are provided and the data subjects have enforceable rights and have effective remedies.

In addition, Atlas Concepts may transfer your personal data to suppliers, potential or actual buyers, sellers or other business partners established outside the EEA, if one of the legal exceptions can be invoked (see Article 49 GDPR).

Examples are:

1. the transfer is necessary for the execution of an agreement that you have with Atlas Concepts;
2. if you, after being sufficiently informed, have expressly agreed to this.

In situations where Atlas Concepts passes your personal data outside the EEA, we respect your personal data and we take measures to ensure that your personal data will remain fully protected.

Please note that in certain circumstances personal data may be provided to government agencies in the context of legal proceedings, court orders or legal proceedings.

## **7. SECURITY**

Atlas Concepts continuously and structurally take measures to optimally protect your personal data against unauthorized use. Atlas Concepts takes physical, administrative, organizational and technical measures. Atlas Concepts took, inter alia, the following measures:

- only persons who are authorized to do so have access to the personal data, whereby as few people as possible have access to the personal data;
- all employees of Atlas Concepts (regardless of the form of their employment) have signed a confidentiality obligation, whereby they undertake to observe full confidentiality regarding all information of a confidential nature or of which they must understand the confidential nature, including personal data;
- electronic transmission of personal data always takes place via a secure connection;
- the website is secured via https;
- Atlas Concepts concludes processor agreements and/or agreements with co-responsible parties if personal data are provided to third parties.

In line with the principles above, Atlas Concepts ensures that all its user settings, programs and services are organized from the start of the development in such a way that your privacy protection is maximized. Atlas Concepts takes privacy-enhancing (security) measures wherever possible. Information or services are only provided if you indicate this actively.

## **8. STORAGE PERIODS**

Atlas Concepts never stores personal data for longer than is necessary to achieve the purposes stated in this privacy statement or to comply with the relevant laws and regulations.

## **9. YOUR RIGHTS**

If your personal data are processed, you have a number of rights, which are set out below. You can exercise these rights by submitting your request in writing and directing it to Atlas Concepts or by sending an email to . Atlas Concepts is obliged to check your identity before your request can be met.

Unless expressly stated otherwise below, Atlas Concepts will respond to your request as soon as possible, but no later than within a month.

### **• Access and/or change personal data**

You can request us at any time to indicate which (categories of) personal data Atlas Concepts processes of you, for what purposes that happens, from which source the personal data comes and which storage periods are used. You can also contact us at any time to supplement, correct or delete your personal data. Should it turn out that Atlas Concepts has processed and/or provided the wrong personal data about you to third parties Atlas Concepts will rectify this. If Atlas Concepts has changed your personal data, you will be informed accordingly.

### **• Limiting the processing of your personal data**

If you do not agree with the content of the personal data that Atlas Concepts processes of you, you can submit a request to temporarily limit the processing of your personal data.

- Withdrawing permission

You can also withdraw your granted permission to process your personal data at any time. After receiving your letter or email, Atlas Concepts will cease the processing of your personal data for which you had granted permission. However, withdrawing your consent does not affect the processing that has already taken place.

- Right to transfer personal data

You can request the personal data that Atlas Concepts stores of you, in a structured, standard and machine-readable form. After receiving the personal data, you are free to transfer this information to third parties.

- Right to be forgotten

If you no longer wish to make use of the services of Atlas Concepts, you can submit a request for the removal of all your personal data.

- Right of objection

You have the right to object to the processing of your personal data by Atlas Concepts if this processing is based on the foundations' legitimate interest of Atlas Concepts or from a third party'

- Right to lodge a complaint/start legal proceedings

If you do not agree with the use of your personal data by Atlas Concepts, you can also submit a complaint to the Dutch Data Protection Authority.

## **10. COOKIES AND COMPARABLE TECHNIQUES**

Atlas Concepts makes use of cookies and similar techniques on its website. Cookies are small pieces of information that are stored on your computer. Atlas Concepts is therefore able to see how its visitors use the website. Atlas Concepts can thus adapt her website to the user preferences. On a subsequent visit to the Atlas Concepts website, these small pieces are recognized.

## **11. QUESTIONS / COMPLAINTS / COMMENTS / PRESUME OF DATA LEAK**

If you have questions, comments or complaints about the protection of your personal data by Atlas Concepts or you suspect that there is a data leak, you can of course contact us.

Our contact details are <https://atlasconcepts.nl/Contact> . You can also send an email to: [info@atlasconcepts.nl](mailto:info@atlasconcepts.nl) or [sales@atlasconcepts.nl](mailto:sales@atlasconcepts.nl) .

## **12. CHANGES AND APPLICABLE LAW**

Atlas Concepts reserves the right to amend or change this privacy statement. If there are material changes to this privacy statement or in the way Atlas Concepts processes your personal data, we will inform you by email and/or by a clearly visible message on our website. None of the provisions of this privacy statement is intended to establish any obligation or agreement between Atlas Concepts and you as person concerned. Dutch law applies to the provisions of this privacy statement and all disputes arising from this.

This privacy statement has been last amended and applies from 24 May 2018.

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