

Privacy Statement App Statement



Version	Release Date	Description
1.0	2024-02-16	App Privacy Statement

Privacy Statement

Introduction

At Keesing Reference Systems B.V. (“**Keesing**”), statutorily established in Amsterdam and registered with the Chamber of Commerce under number 33230429, we prioritize your privacy while you use our App. This statement informs you as a data subject about our privacy practices.

Personal Data Processing by Keesing

Data subjects	Personal data	Purpose(s)
App users	E-mail address, user ID, IP address	We collect your personal data to facilitate services such as authentication and improvements of the App.

Legal basis for processing your personal data

Keesing primarily processes your personal data for the execution of an agreement with a customer, on the basis of our legitimate interests (such as the improvement of our system and the quality of our services) or based on your consent. In case your personal data is processed based on your consent, you can withdraw your consent at any time (but this will have no effect on processing already carried out). For processing purposes, please also be referred to the table above. Keesing processes your personal data only to the extent necessary for the purposes set out above or for purposes compatible therewith.

Data Sharing by Keesing

Your data may be shared with our technical team, Microsoft Ireland Operations Ltd for cloud solutions, and other entities as mandated by law. When we share your personal data with others, we also make written agreements with them about the processing of your personal data. In addition we do so as far as possible in anonymised form or limited personal data we transfer to those parties to what is strictly necessary. Furthermore, we ensure that the third parties are bound by confidentiality and take appropriate security measures to prevent your personal data from simply becoming known to the other parties. In some cases, a legal obligation requires us to provide data to third parties, such as the judicial authorities. In doing so, we always consider how we can respect your right to privacy as much as possible.

Data Retention by Keesing

Keesing does not retain personal data for longer than is necessary for the purposes for which we process the personal data, unless we are required to retain your personal data for longer under a statutory provision or on the basis of our overriding legitimate interests (such as an ongoing dispute). Furthermore, the exact retention period is determined in agreement



with the customer, subject, of course, to any statutory retention periods and in compliance with the above.

Data Protection by Keesing

Keesing endeavours to implement appropriate organisational and technical (security) measures to protect your personal data against unlawful access or alteration, disclosure or destruction. For example, we work with secure data networks protected by firewall and password protection and virus scanners, among others. Moreover, all laptops used by us are protected by means of encryption or other security measures.

If, despite the security measures, there is a security incident (data breach) that is likely to have adverse effects on your privacy, we will inform you about the incident as soon as possible. We will then also inform you of the measures we have taken to mitigate the consequences and to prevent recurrence in the future.

In the unlikely event that you discover a security breach or suspect that the security of your personal data is not properly guaranteed, please contact us immediately. We have procedures in place to handle these reports adequately and carefully in accordance with the applicable legislation.

Your Rights

You have the following rights concerning the processing of your personal data:

- You can request **information about and access to** the personal data that we process about you. This merely means that you can ask what personal data has been recorded about you and for what purposes that personal data is used and with which third parties it is shared.
- You can **object** to the processing of your personal data, for example if you believe that the use of your personal data is not necessary for the execution of our activities or to comply with a legal obligation.
- You can request us to have your personal data **amended/corrected** and/or to restrict the processing of your personal data.
- You can ask us to **delete** your personal data from our systems.
- You can ask us to arrange for your personal data to be **transferred** to another party.
- You can **withdraw consent** for the processing of your personal data as given by you at any time. Please note that you do not withdraw your consent for personal data previously processed on the basis of your consent.

Requests and other communications regarding the exercise of the aforementioned rights can be made in writing using the contact details below. If we deem it necessary, we may ask additional questions to verify your identity. You will generally receive a response within one (1) month of receiving your request. We will comply with your request unless we have a compelling legitimate interest not to comply with your request that outweighs your privacy interest. Also, for technical reasons, we cannot (always) immediately delete all copies of personal data from our systems and backup systems. We may also refuse to comply with the



aforementioned requests if they are made unreasonably frequently, require unreasonable technical effort or have an unreasonable technical impact on our systems or jeopardise the privacy of others.

If Keesing has complied with a request to correct, supplement or delete personal data, or if you have withdrawn previously given consent to process your personal data, we will also inform third parties to whom these personal data has been provided of the changes made.

If you are not satisfied with the way we have dealt with your request or objection or otherwise with the processing of your personal data by Keesing you can also lodge a complaint about the use of your personal data with the Dutch Data Protection Authority via: [link](#).

Data Transfers by Keesing

In principle, we do not share your personal data outside the European Economic Area (EEA). If we transfer your personal data to countries outside the EEA, we will only do so under the conditions required by privacy legislation (inter alia, we will make effort to ensure that an adequate level of protection exists and will put in place contractual, technical and organisational safeguards where necessary, for example by means of a contract to which the EU Model Clauses (SCCs) apply and any additional measures where required by law).

Automated decision making

Keesing does not make decisions on matters that could (significantly) affect individuals on the basis of automated processing. There is therefore no question of profiling within the meaning of the GDPR.

Updates to the Policy

Keesing may amend or update this privacy policy from time to time. Amendments to this privacy policy will take effect from the moment they are published on our Website. We therefore encourage you to consult this privacy policy regularly, so that you are aware of any changes to this privacy policy. If these adjustments are of significant importance to you, we will inform you accordingly.

Contact details

For any concerns or questions about this policy, reach out to us at gdpr@keesingtechnologies.com.

Thank you for trusting Keesing with your data.

