

Privacy Policy

This Privacy Policy **FirmQ Compliance Services BV** ('FCS') uses a number of definitions (these definitions can be used both in singular and plural):

Regulations: this privacy policy

Privacy Law: the Dutch General Data Protection Regulation which is called the Algemene Verordening Gegevensbescherming.

1. Explanation of the Regulations

1.1 FCS may not simply process the data you provide to her. The Privacy Law is intended to protect the privacy of individuals.

1.2 This legislation restricts the permitted use of your personal data by others.

1.3 Under this law FCS has the duty to its customers:

- a. to inform them of the way in which and the purpose with which data are processed by FCS;
- b. to report who can review the data;
- c. to request permission for the processing of certain data.

1.4 FCS highly values your privacy. That is why FCS provides an explanation in these Regulations on how it handles your data, what the purpose of its use is and for the processing of which data FCS must explicitly request your permission.

2. Personal data and purpose

2.1 FCS (possibly) processes your personal data if you:

- a. become or are a customer of FCS;
- b. are a business relation of FCS;
- c. (via the contact form) contact FCS.

2.2 FCS (possibly) collects your name, telephone number and e-mail address if you are a customer or a business relation.

2.3 This data enables FCS to:

- a. to be able to settle the agreement that customers conclude with FCS financially and administratively;
- b. to be able to provide the services;
- c. to be able to reach customers or interested parties if necessary;
- d. to be able to further develop/optimize the service.

3. Cookies

3.1 FCS prefers not to use cookies because we do not want to infringe on your privacy.

3.2 Only the cookies that are strictly necessary for the website to work properly apply to us. These cookies are anonymous and have no impact on your privacy.

3.3 We therefore do not use the information from our website to gain insight into your internet behavior.

4. Provision of personal data to third parties

4.1 FCS does not provide personal data to individuals or companies outside of FCS, unless:

- a. a statutory provision that makes it mandatory;
- b. that is necessary for the performance of an agreement that FCS has concluded with you;
- c. you have given permission for this.

5. Duties/Secure Access/ Confidentiality/Retention Period

5.1 FCS processes your personal data exclusively in accordance with the law. This means (among other things) that the data is only processed for the purpose for which it was obtained and in a proper/careful manner in accordance with the law and these Regulations.

5.2 Your personal data can only be viewed by persons working for FCS, unless provided otherwise in these Regulations.

5.3 All your personal data is protected by FCS against unauthorized access. The security consists of:

- a. having a personal password for every person working for FCS to log in to the digital system;
- b. a duty of confidentiality for persons working for FCS with regard to all personal data provided to FCS;
- c. technical measures by FCS in accordance with the law, to protect the system it uses against external infringements.

5.4 Your personal data will not be kept longer than is necessary for proper administration and/or other established purposes.

5.5 FCS stores your personal data for as long as is necessary for proper business operations, with due observance of a reasonable term. The law may prescribe a different retention period. If so, FCS will adhere to the prescribed statutory retention period.

6. Your rights as a person involved

6.1 *The right to information.* You have the right to know whether and which of your personal data is processed and for what purpose.

6.2 *Right of inspection.* You have the right to inspect and receive copies of that data, insofar as this does not harm the privacy of another person.

6.3 *The right to correction and deletion.* You have the right to correct, modify or delete data. The right to (partial) deletion of your data can only be met if the retention of the data is not of significant importance to someone else and the data is not required to be retained on the basis of a statutory regulation.

6.4 *The right to object.* In certain cases you have the right to object to the processing of your data.

6.5 *The right to data portability.* You have the right to receive personal data held about you and to transfer it to another organization

6.6 *The right to a human view in automated decisions.*

With an automated decision, you have the right to have the decision made through human intervention.

6.7 If you want to make use of the aforementioned rights, you can send a request by e-mail to info@firmq.com. If your request is rejected, this will be substantiated. One reason may be that your file contains information that is or may be of interest to others. You will receive a message from **FCS** within one month of receipt of your request.

6.8 Even if you have a complaint about the way your personal data is processed, you can contact **FCS** and **FCS** will try to resolve this matter together with you.

Den-Haag, 1-4-2022