

AKKERMANS & PARTNERS PRIVACY POLICY

Version 1.0

Date 15 April 2020

This privacy policy describes the ways in which we, Akkermans & Partners, including Akkermans & Partners Software B.V. (NL), Akkermans & Partners Knowledge B.V. (NL), Akkermans & Partners Netwerken B.V. (NL), Akkermans & Partners N.V. (BE) and Akkermans & Partners B.V. (BE) (“**Akkermans & Partners**”, “**we**”, “**us**”), process the personal data of our website visitors, (employees of) customers and clients of customers (“**the user**”, “**you**”).

ARTICLE 1. APPLICABILITY

- 1.1 This privacy policy applies to all processing operations to which the General Data Protection Regulation (“GDPR”) and relevant national legislation, including implementing legislation, applies.

ARTICLE 2. RESPONSIBILITY

- 2.1 Akkermans & Partners only processes personal data in accordance with relevant privacy laws and as described in this privacy policy.
- 2.2 Akkermans & Partners is to be regarded as the controller within the meaning of the GDPR with regard to the processing operations relating to our website, Knowledge Applications and (on-premise) Consultancy Applications, and the Training programmes as offered by Akkermans & Partners and specified in Appendix 1 of this privacy policy. This privacy policy pertains to those activities only. With regard to the other activities, Akkermans & Partners is to be regarded as the processor. For information about these processing activities, Akkermans & Partners refers to the party through which you use one or several Akkermans & Partners tools.
- 2.3 The website contains links to websites of third parties. Akkermans & Partners is not responsible for the contents of these third-party websites, the services offered by them, or the way in which they process personal data.

ARTICLE 3. HOW AKKERMANS & PARTNERS COLLECTS PERSONAL DATA

- 3.1 Akkermans & Partners collects personal data in various ways:
- a) Information you provided to Akkermans & Partners, for example when you contact Akkermans & Partners or register for a newsletter.
 - b) Information that is collected automatically when you visit the website. This is done by cookies that Akkermans & Partners uses on the website. For more information on the cookie policy, see Article 5.
 - c) Information that Akkermans & Partners obtains from third parties, for example when Akkermans & Partners requests information about your business from the Chamber of Commerce.
 - d) Information that Akkermans & Partners obtains through analyses. In some cases, Akkermans & Partners may analyse information about you – the results of this analysis may sometimes be regarded as personal data, for example a counting of the most frequently visited webpages on

our website.

- 3.2 In some cases it may be desirable, or there may be a contractual obligation, to provide certain personal data to Akkermans & Partners. If this is the case, Akkermans & Partners will inform you about it. Akkermans & Partners will also inform you of the consequences if you do not provide the personal data.

ARTICLE 4. PERSONAL DATA PROCESSING

- 4.1 What personal data is processed by Akkermans & Partners, the processing operation concerned determines the grounds on which and the purposes for which this is done by Akkermans & Partners. See below for an overview.

CATEGORIES OF PERSONAL DATA

- 6.1 When you visit the website, Akkermans & Partners processes the following personal data:
- Information about your device;
 - IP address;
 - Location;
 - Preferences by means of cookies (See Article 5 for more information).
- 6.2 When you register as an organisation for one of our tools or when you use our services with regard to the knowledge applications, (on-premise) consultancy applications and/or our training programmes, Akkermans & Partners processes the following personal data:
- Last name;
 - Email address;
 - Gender;
 - Login details;
 - Memberships of professional organisations, if any;
 - Name of the organisation;
 - Telephone number;
 - Initials;
 - First name;
 - Prefix.

PURPOSES AND GROUND

When you visit the website or otherwise use our services, Akkermans & Partners processes your personal data for the following purposes and based on the following grounds:

- The performance of an agreement** you have entered into with Akkermans & Partners or another party, or for the preparations of an agreement you enter into with Akkermans & Partners or another party.
- Communication:** Akkermans & Partners uses your personal data to communicate with you or to inform you about matters that are of importance to you. Akkermans & Partners does so because this is necessary for the performance of an agreement with you or because of our legitimate interests, i.e. the performance of our normal business activities.
- Marketing:** Akkermans & Partners sends marketing-related emails or newsletters or may

approach you as a customer via email. These activities are performed based on the following grounds:

- Legitimate interests: Akkermans & Partners may send you offers if you have provided us with a specific email address for this purpose, based on our legitimate interests, i.e. the performance of our normal business activities. You can always unsubscribe from these mailings via the link at the bottom of this email.
- Consent: offers in all other cases – on the basis of your consent only. You can always unsubscribe from these mailings via the link at the bottom of this email.

iv. **Customer service:** when you contact our customer service, your personal data is processed in order to provide these services. The processing operations are necessary for the performance of an agreement with you or are performed on the basis of our legitimate interests, i.e. the performance of our normal business activities.

v. **Internal management:** it may be necessary to process your personal data for the purpose of internal administration related to normal business activities. This may also include providing confidential access to the Akkermans company details in the event of a possible takeover. The ground for such processing is the legitimate interest of Akkermans & Partners.

4.2 If our processing operations have been based on our legitimate interests, information may be requested from us about the so-called 'balance test' performed by Akkermans & Partners to determine whether we could make use of this ground for purposes of processing. You can find our contact details at the bottom of this page.

4.3 If Akkermans & Partners processes your personal data for purposes other than for which it was obtained, Akkermans & Partners will inform you of this in a timely manner.

ARTICLE 5. COOKIES

5.1 Depending on your preferences, Akkermans & Partners uses different types of cookies. You can find an overview of the cookies used, as well as information about the way in which these cookies are deployed, in the Akkermans & Partners [cookie statement](#).

5.2 For all websites, you can set your cookie preferences via the settings of your browser. The types of preferences you can set vary for each browser. Go to: www.aboutcookies.org/how-to-control-cookies/ for more information.

5.3 Please note that the functionality of the website may be affected if you refuse certain types of cookies.

ARTICLE 6. SHARING WITH THIRD PARTIES

6.1 Akkermans & Partners only shares personal data in the context of its normal business operations with third parties if this is necessary for the performance of our services. In that case, Akkermans & Partners shares personal data with the following parties:

- a) Among themselves, between the different entities of Akkermans & Partners, namely Akkermans & Partners Software B.V., Akkermans & Partners Knowledge B.V. and Akkermans & Partners Netwerken B.V., Akkermans & Partners N.V. (BE) and Akkermans & Partners B.V. (BE);
- b) Subcontractors and service providers such as: consulting companies, law firms, insurance

- companies, payment service providers, hosting companies, and governments;
- c) Competent authorities insofar as legally necessary.

ARTICLE 7. TRANSFER OUTSIDE THE EEA

- 7.1 When processing personal data, Akkermans & Partners does not engage parties located outside the European Economic Area (EEA). If this is the case in the future, Akkermans & Partners will take the necessary measures for adequate protection of your personal data and Akkermans & Partners will inform you of this in a timely manner.

ARTICLE 8. SECURITY

- 8.1 Akkermans & Partners takes sufficient technical and organisational measures to protect your personal data against loss, abuse and/or unauthorised alteration. In addition, Akkermans & Partners only provides access to personal data to persons insofar as necessary for the performance of our services. These persons are also bound by an obligation of confidentiality by virtue of an agreement or an employment agreement.
- 8.2 Examples of technical measures taken by Akkermans & Partners:
- a) Logical physical security measures (e.g. a safe, firewalls, and segmentation of networks);
 - b) Technical checks on authorisations in systems (the roles are limited to the extent possible) and the use of logfiles;
 - c) Management of technical vulnerabilities (patch management);
 - d) Keeping software up to date (e.g. browsers, virus scanners and operating systems);
 - e) Making backups of personal data in order to warrant availability and access;
 - f) Applying encryption to personal data;
 - g) Applying hashing or other forms of pseudonymisation to passwords and personal data; and
 - h) The option for organisations to link with Azure Active Directory and the option for users to apply two-factor authentication;
 - i) Offering safe storage options to end users (e.g. file server storage).
- 8.3 Examples of organisational measures taken by Akkermans & Partners:
- a) Assigning roles and responsibilities with regard to information security;
 - b) Promoting privacy awareness with current and new employees;
 - c) Drafting procedures for periodic checks, assessments and evaluations of security measures;
 - d) Periodic reviews of logfiles;
 - e) Use of a protocol for dealing with data breaches and other security incidents;
 - f) Entering into confidentiality, processing and data protection agreements;
 - g) Investigating and applying options for data minimisation;
 - h) Making personal data accessible to as few people as possible within the organisation; and
 - i) Drawing up considerations and decisions with regard to each separate processing operation.
 - j) Performing internal and external audits of the organisational measures in accordance with the ISO 27001 guidelines.
- 8.4 In our internal protocols, Akkermans & Partners describes how an appropriate level of security is provided. Akkermans & Partners also has a data breach protocol in place, describing how Akkermans & Partners deals with a data breach or security incident.

ARTICLE 9. RETENTION PERIODS

- 9.1 In principle, Akkermans & Partners does not store your personal data for longer than necessary for the purposes for which it is processed. To ensure that personal data is removed in time, Akkermans & Partners has drawn up a retention policy.
- 9.2 Akkermans & Partners uses the following retention periods: All personal data is retained till no longer than 3 months after the expiry of the agreement. This data is subsequently pseudonymised if it is still used in analyses. All other data is removed.

ARTICLE 10. YOUR RIGHTS

- 10.1 You have the following rights with regard to our processing operations.
- a) **The right to withdraw your consent:** to the extent our processing operations have been based on your consent, you at all times have the right to withdraw this consent.
 - b) **Right of access:** you have the right of access to the personal data that Akkermans & Partners processes of you. This right gives you the option to receive a copy of the personal data that Akkermans & Partners processes of you. Akkermans & Partners will also provide you with additional information about the relevant processing operations.
 - c) **Right to rectification:** you have the right to rectify any incorrect data immediately. By virtue of this right, incorrect personal data processed by Akkermans & Partners can be adjusted or supplemented.
 - d) **Right to erasure:** you have the right 'to be forgotten'. The right to be forgotten applies if (i) the personal data is no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing of your personal data, (iv) Akkermans & Partners processes your personal data unlawfully, (v) personal data must be removed pursuant to Union law or member state law, or (vi) Akkermans & Partners has collected your personal data in the context of information society services. Insofar as the processing of personal data is necessary (i) for exercising our right to freedom of speech and information, (ii) for compliance with a statutory task carried out in the public interest or a task related to the exercise of public authority, (iii) for reasons of public interest in the area of public health, (iv) for archiving purposes in the public interest, and/or (v) for the establishment, exercise or defence of legal claims, Akkermans & Partners may refuse recourse to the right to erasure.
 - e) **Right to object:** if our processing operations are based on our legitimate interests, you have the right to object. Insofar as your personal data is processed in the context of direct marketing, your request will always be granted. In other cases, Akkermans & Partners will also cease processing your personal data, unless there are urgent legitimate reasons with regard to the processing of your personal data that outweigh your interests.
 - f) **Right to restriction of processing:** you have the right to restriction of processing if (i) you have contested the accuracy of the personal data, (ii) Akkermans & Partners unlawfully processes your personal data and you do not want this data to be erased, (iii) Akkermans & Partners no longer needs your personal data, but you want to use this data for the establishment, exercise or defence of legal claims, and/or (iv) you have objected to the processing of your personal data. If Akkermans & Partners has granted your request, your personal data will only be stored by us. Akkermans & Partners will not process your personal data in any other way, unless you have

given your consent, this is necessary for the establishment, exercise or defence of legal claims, this is necessary for the protection of rights of third parties, or for urgent reasons of public interest.

- g) **Right to data portability:** if our processing operations are based on your consent or on the performance of an agreement and are carried out through automated processes, you have the right to obtain your personal data in a structured, commonly used and machine-readable format and transfer this data, or have it transferred, to another controller.
- h) **Automated decision-making:** you have the right not to be subjected to a decision that solely has been based on automated processing operations and that entails legal consequences or otherwise impacts you considerably.
- i) **Lodging a complaint:** in addition to the above-mentioned rights, you also have the right to lodge a complaint with the relevant data protection authority. In the Netherlands, this is the Dutch Data Protection Authority. However, Akkermans & Partners would like to resolve complaints together with you. Akkermans & Partners therefore asks you to contact us first.

10.2 You can make use of one of the above-mentioned rights by contacting us. You can rely on the above-mentioned rights without any costs, unless your requests are evidently unfounded or excessive. In those cases, Akkermans & Partners will ask for a reasonable compensation or refuse to grant the request.

10.3 Before responding to your request, Akkermans & Partners may request additional information for verification of your identity.

10.4 As soon as possible, and in any case within a month after receipt of your request, Akkermans & Partners will provide information about the follow-up. Depending on the complexity of the requests and the number of requests this term may, if necessary, be extended by another two months. Akkermans & Partners will inform you of this within a month after receipt of the request.

ARTICLE 11. CONTACT

11.1 If you have any questions, you can contact us through our Online Helpdesk.

ARTICLE 12. MISCELLANEOUS

12.1 Akkermans & Partners is at all times entitled to remove your personal data. In this case, Akkermans & Partners does not owe you any compensation whatsoever.

12.2 If any provisions of this privacy policy are in conflict with the law, the conflicting provisions will, to the extent permitted by the law, be replaced with provisions that have the same purport. In that case, the other provisions will remain in full force.

12.3 Akkermans & Partners is entitled to amend this privacy policy. If necessary, Akkermans & Partners will inform you about these amendments. The latest version will at all times be available on our websites akkermans.nl, akkermanspartners.be and finsourceone.com or all subdomains and other extensions of these domain names. This current version was last updated on 15 April 2020.

ARTICLE 13. DEFINITIONS

13.1 The following definitions apply to this privacy policy:

Akkermans & Partners	<p>Akkermans & Partners Software B.V. (NL) Chamber of Commerce number: 18030369</p> <p>Akkermans & Partners Knowledge B.V. (NL) Chamber of Commerce number: 18048659</p> <p>Akkermans & Partners (pensioen) Netwerken B.V. (NL) Chamber of Commerce number: 18076823</p> <p>Address: Koningshoeve 63, 5018 AA Tilburg, the Netherlands</p> <p>Akkermans & Partners N.V. (BE) Enterprise number: 0865.573.560</p> <p>Akkermans & Partners Knowledge B.V. (BE) Enterprise number:</p> <p>Address: Generaal Lemanstraat 74, 2600 Antwerp, Belgium</p>
Privacy policy	This privacy policy.
Relevant privacy legislation	General Data Protection Regulation ('GDPR') and relevant national legislation, including implementing legislation.
Website	akkermans.nl , akkermanspartners.be and finsourceone.com or all subdomains and other extensions of these domain names.

- 13.2 Other terms as defined in relevant privacy legislation, such as 'personal data', '(joint) controller', 'processor', 'data subject' and 'processing' have the same meaning as in relevant privacy legislation.

APPENDIX 1: PROCESSING OPERATIONS

Akkermans & Partners is to be regarded as a controller within the meaning of the GDPR with regard to the following processing operations:

Activity	Categories of personal data
Knowledge platform	<ul style="list-style-type: none"> • Member login details.
Training programmes	<ul style="list-style-type: none"> • Name of the organisation; • Gender; • Initials; • First name; • Prefix; • Last name; • Email address; • Telephone number; • Memberships of professional organisations.
Website use	<ul style="list-style-type: none"> • Information about your device; • IP address; • Location; • Preferences by means of cookies (See Article 5 for more information).
Administration with regard to the use of other tools in respect of which Akkermans & Partners is the <i>processor</i>	<ul style="list-style-type: none"> • Name of the organisation; • Gender; • Initials; • First name; • Prefix; • Last name; • Email address; • Telephone number.