

## Privacy Policy

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### 1. Introduction

This Privacy Policy ("Notice") has been developed to ensure our customers, LEEPS website visitors and any other interested parties (hereinafter referred to as "you") feel confident about the privacy and security of personal data. It outlines how LEEPS meet the obligations under the General Data Protection Regulation ("GDPR") and other applicable data protection and privacy legislation, as amended, revised, modified or replaced from time to time (together, the "Legislation"). Under the Legislation, 'personal data' is any information that identifies you, or could identify you, directly or indirectly, as an individual. To the extent LEEPS act as a 'data controller', as defined in the Legislation, we comply with the data protection principles and obligations set down in the Legislation.

This Notice pertains to all personal data collected, processed and stored by LEEPS through our websites, applications, and any related services, sales, marketing, or events in the course of our activities. The purpose of this Notice is to explain the procedures that are followed when dealing with personal data and how LEEPS collect and manage personal information in accordance with all relevant legislation and standards. The procedures set out herein are followed by LEEPS, our employees, agents, contractors, or other third parties on behalf of LEEPS. This Notice extends to all personal data whether stored in electronic or paper format.

### 2. What Personal Information do we collect?

LEEPS only hold personal data that is directly relevant to our dealings with a given data subject. That data will be collected, held, processed and disposed of in accordance with the Legislation and other data protection principles and with this Notice in a reasonable and lawful manner.

LEEPS collect personal information that is voluntarily provided to us when signing up for our services, expressing an interest in obtaining information about us or our products and services, when participating in activities on our sites, or otherwise contacting us. The personal information that we collect depends on the context of the interactions with us and our sites, the choices made and the products and features selected and used. For example:

- Customer will be requested to provide the following information for provision of services and for the purposes of account administration and billing: personal identification data, including name, address, phone number and/or email address(es).
- Some information (such as online identification data, including IP address, browser and device characteristics, referring URLs, country, location, information about how and when you use our Site and other technical information) is automatically collected when visiting our websites. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.
- We hold credentials and other authentication data for LEEPS customer accounts.
- We may obtain information about Customer/Supplier/Website visitor from other sources, such as public databases, joint marketing partners, social media platforms, as well as from other third parties. Examples of the information we receive from other sources may include: social media profile information (name, email, hiring company, physical addresses, user identification numbers for Customer's contacts, URL and any other information that is chosen to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

### 3. Processing Personal Data

Any and all personal data collected from you as customers of us is collected in order to ensure that we can provide the services under the terms of our services agreement, that we provide the services in the best possible manner, and that we can efficiently manage our customers as a whole.

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent. We use the personal data provided by you to provide the Services and for business purposes such as processing and fulfilling orders, billing, service improvement, research, marketing and for other general business purposes. LEEPS may share such information with third parties for business and marketing purposes. Business purposes may include:

- direct provisioning of the services to you
- resolving issues arising during the provisioning of the services or the services agreement with you
- billing for services provided by us under the services agreement with you
- administration of customer accounts, including:
  - ensuring the ongoing provision of optimized services to you
  - informing you of the status of the services
  - implementing any changes to services
  - billing or customer information as requested by you
- account creation and logon processes
- requesting feedback and contacting you about your use of our Sites
- contacting you regarding information on available upgrades or updates

### 4. Accuracy

We endeavor to ensure personal information held by us is up to date and accurate. We shall employ reasonable means to keep personal data accurate, complete, and up to date in accordance with the purposes for which it was collected. You, as customer, are responsible for ensuring that you inform the relevant department of any changes in your personal details. Changes to personal information may be made by contacting your Account/Service Manager.

### 5. Do we disclose information to anyone else?

Personal data may be disclosed internally when passed from one department to another in accordance with the data protection principles and this Notice. Personal data is not passed to any internal department or any individual that does not reasonably require access to that personal data with respect to the purpose(s) for which it was collected and is being processed. Relevant internal departments to whom personal data may be disclosed includes: sales; marketing; customer service; billing; account and technical managers; network operations; security operations; and legal.

We shall disclose your personal information to third parties only when it is necessary as part of our business practices, when there is a legal or statutory obligation to do so, or with your consent. Categories of such third parties may include: service providers, subcontractors, credit collection agencies, auditors, and authorities to whom we are legally obliged to disclose personal information (e.g. law enforcement, tax authorities, etc.). Whenever we disclose personal

information to third parties, we will only disclose that amount of personal information necessary to meet such business need or legal requirement. Third parties that receive personal information from us must provide sufficient guarantees and satisfy us as to the measures taken to protect the personal data such parties receive and process it in accordance with the Legislation. Appropriate measures will be taken to ensure that all such disclosures or transfers of personal information to third parties will be completed in a secure manner and pursuant to contractual safeguards.

We may provide information, when legally obliged to do so and in response to properly made requests, for example under a court order or for the purpose of the prevention and detection of crime, and the apprehension or prosecution of offenders. In the case of any such disclosure, we will do so only in accordance with the Legislation. We may also transfer data to legal counsel where this is necessary for the defense of legal claims. If there is any change in the ownership of LEEPS B.V. or any of its assets, we may disclose personal information to the new (or prospective) owner(s). If we do so, we will require the other party(ies) to keep all such information confidential.

#### **6. How long do we keep personal information?**

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

The time period for which we retain information varies according to the law provisions about the use of that information. In some cases, there are legal requirements to keep data for a minimum period of time. Unless specific legal requirements dictate otherwise, we will retain information no longer than is necessary for the purposes for which the data were collected or for which they are further processed. Customer personal data will be held for as long as the customer holds a services agreement for the provision of services with us. Following termination of service, personal data shall continue to be retained for the minimum period mandatory under local law. Following this mandatory period, personal data shall be retained for no longer than necessary to allow for the defense of legal claims in accordance with applicable statutory limitation periods under local law. Following the expiry of this period, personal data held by us will be destroyed.

#### **7. How do we protect personal information?**

We shall employ reasonable and appropriate with the state of the art administrative, technical, personnel, procedural, and physical measures to safeguard information against loss, theft and unauthorized uses, access, or modifications.

#### **8. How can you make a complaint to us about the use of personal data?**

Complaints on the use, retention and disposal of personal data can be submitted via email to [privacy@leeps.nl](mailto:privacy@leeps.nl)

As a customer, you also have the right to lodge a complaint with your National Data Protection supervisory Authority [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

#### **9. Review**

This Notice will be reviewed and updated annually to take into account changes in applicable laws and the experience of the Notice in practice. If we make material changes to this Privacy Policy.