

## Privacy statement

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Solvinity (hereinafter referred to as: 'we') processes personal data of its customers, suppliers, prospects and other contact persons. We do this to help our customers as best as we can and to achieve our objectives. In this privacy statement, we explain why and in which way we process your personal data.

We are happy to help you with your questions. To do so, please contact us at [dpo@solvinity.com](mailto:dpo@solvinity.com) or +31 (0)20 364 36 00.

### Who are we?

We are Solvinity: Secure Managed Cloud provider. This privacy statement applies to all our processing of your personal data.

### Which personal data do we process?

First name and surname, address, place of residence, telephone number, gender, email address, job title, organisation, IP address, contact history, cookie ID (you can read more about cookies in our [cookie statement](#)) and surfing behaviour (on our websites).

### Why do we process that personal data?

We process your personal data on the basis of the following GDPR principles:

- Consent
- Legitimate interest

#### Consent

##### Newsletters and mailing lists

We process some personal data with your consent. This mainly concerns online data tracking methods and sending newsletters.

You can sign up for different types of mailings. These are sometimes personalised, and sometimes not. If you no longer wish to receive mailings, you can unsubscribe via the subscription centre that is accessible via the Unsubscribe link. You can unsubscribe from transactional emails by sending an email to [marketing@solvinity.com](mailto:marketing@solvinity.com).

#### Legitimate interest

##### Recruitment (Marketing)

In order to achieve our corporate objectives, we recruit new prospects, customers and colleagues. In order to be able to stay in touch with everybody, we process their contact details and areas of interest.

We also process personal data such as IP addresses, cookie ID, social ID and surfing behaviour for Solvinity campaigns and Solvinity-related campaigns (for example, our IT Experiences events). We do this

to be able to show the most relevant advertisements in the right places and to be able to measure the success of our campaigns.

We also use 'adapted target groups' via social media platforms for Solvinity campaigns and Solvinity-related campaigns. We do this via Google and LinkedIn targeting. (Personalised) advertisements can be shown on these platforms. We do not pass on personal data to third parties for this purpose, unless you have given your explicit consent to do so.

If you do not want advertisements to be displayed via these platforms, you can unsubscribe to this via the relevant platform(s). You can read how to do this on the following pages:

- [Facebook](#)
- [LinkedIn](#)
- [X](#)

However, please note that it is still likely that you will be presented with Solvinity advertisements if you belong to a general target group that we target with our advertisements.

If you would like to know more about the assessment we make in relation to legitimate interest, please contact us.

### Improving Solvinity service provision

We also keep track of data to improve our service provision, for example click behaviour on the website in order to analyse which articles are most read and open rates to see whether our newsletters are relevant. We do this as anonymously as possible. We do not provide third parties with your personal data in this case either, unless you have given us explicit consent to do so.

## Rights of data subjects

The GDPR provides everyone a number of rights:

- **Access:** You can of course see what personal data we process. We are happy to tell you more about how and why we process this data. If you would like to make use of this right, please contact us. This is free of charge.
- **Rectification:** Are we keeping an incorrect record of your personal data? Please let us know and we will amend this.
- **Erasure:** You can request to delete copies of your personal data that we keep. However, it may be the case that we must process this data for other purposes (such as administration or to eliminate double entries).
- **Restriction of processing:** Under the GDPR, you have the right to ask us to temporarily stop processing your personal data. On the website of the Dutch Data Protection Authority (DPA) you can read when this is (not) possible. If you would like to exercise this right, please contact us.
- **Objection to processing:** You can submit an objection in relation to the processing of your personal data. Does it concern marketing? In that case, we will terminate the processing as soon as possible.
- **Data portability:** Under the GDPR, you have the right to transfer your personal data, or have it transferred. On the Dutch DPA website you can read when this is and isn't possible. If you want to make use of this right, please contact us.

- **Withdraw consent:** For instance, with regard to receiving mailings. If you want to withdraw your consent for another type of processing, please contact us.
- **Automated decision-making:** We do not make automated decisions based on your data.

To exercise your rights, please contact us. Your request will be processed within one month. If we need more time to process your request, you will be informed. We may ask for additional documentation to verify your identity.

Do you think we are not acting in accordance with the GDPR? Of course, we would like to hear about that. You can also file a complaint about this with the Dutch DPA using [this form](#).

Do you have any tips or comments? Let us know!

## Retention periods

Solvinity retains personal data only for as long as necessary to fulfil the specified purposes for which it was collected and to meet legal, regulatory, and contractual obligations. We determine retention periods using criteria set out in the GDPR, including: the nature and categories of the data, the purposes and lawful basis for processing, statutory or regulatory retention requirements, applicable limitation periods for legal claims, the duration of contracts and post-contract obligations, user account activity, and security, fraud prevention, and audit needs. When the relevant purpose no longer applies, we delete the data or irreversibly anonymize it. Longer retention may occur where required to establish, exercise, or defend legal claims or to comply with legal holds. We maintain a documented retention schedule and conduct periodic reviews.

## Recipients

We engage service providers for the execution of some elements of our service provision. For example, we collaborate with a marketing agency, a PR agency, and a telemarketing agency. We also make use of Google Analytics, Microsoft Dynamics CRM and Recrutee. These parties process personal data in accordance with their agreement with Solvinity. Furthermore, we will only provide data to third parties if we have received consent to do so.

### Recipients outside the EU

This website contains cookies from Google as part of Google Ads, Google Analytics and YouTube service. We use Google Analytics to track and analyse how visitors use the website. YouTube is used to show videos. The information is transferred to and stored by Google on servers located in the United States. To this end, we have entered into a processing agreement with Google. Google LLC is certified under the EU-US Data Privacy Framework (DPF). In the event the EU-US DPF is no longer recognized as an appropriate means for transferring personal data outside of the EU, we will rely on Standard Contractual Clauses as a fallback mechanism.

For more information, see Google's [privacy statement](#). Our cookie statement can be read [here](#).

## Security measures

Your personal data is protected with various information security measures, such as:

- Strong data encryption in transit and at rest
- Logical and physical access controls
- Patch management of our systems

## Links

The Solvinity website contains a number of links to other organisations' websites. Solvinity does not accept any responsibility for how these parties process personal data. You can read the privacy statement of the organisation in question to learn more about that.