

Privacy policy regarding the user event registration system

Scope of application and purpose

This policy applies to the processing of personal data of Activo customers by Activo ("Activo" or "we"). The purpose of this policy is to provide our current, former and prospective customers (jointly referred to as "customers" or "you") a general understanding of:

- The circumstances under which we collect and process your personal data
- The types of personal data that we collect
- The reasons for collecting your personal data
- The manner in which we handle your personal data
- Our contact details, so that you can request information and exercise your rights with regard to us processing your personal data

Data processing by Activo

Activo is the processor of all personal data that is processed in the context of the event registration system as well as for compliance with all statutory requirements.

Data processing principles

Processing your personal data is a significant aspect of our business to supply you with products and services. We appreciate your trust in us when you provide your personal data and we consider protecting your privacy an essential part of the services we offer. In order to protect your personal data, we abide by the following five general principles:

Freedom of choice

Your personal data belongs to you. We aim to refrain from making assumptions regarding your privacy preferences and to render our services in such a way that you can choose whether or not you wish to share your personal data with us.

Weighing interests

Where the processing of your personal data is necessary for pursuing a legitimate interest, and where this interest outweighs the need to protect your privacy, we are allowed to process specific personal data without your explicit consent, provided that it is permitted by law. In other specific situations, we are also allowed to process your personal data without your consent, if this is a legal requirement. See for more information the "Consent" section below. If your personal data is processed to serve a general interest, we do so on the basis of the potential advantages (including security) to our customers.

Proportionality

Activo shall solely process the personal data of its customers if this is adequate, relevant and necessary in light of the purpose for which it has been collected. We aim to anonymise your personal data where a function or service can be realised with anonymised data. If we combine anonymised data or non-personal data with your personal data, it shall be handled as personal data as long as the combination is in tact.

Transparency and security

Activo believes in transparency where it concerns the question of which personal data we process and the purpose for which we do. It is also vitally important to us to protect your personal data, because one of Activo's core values is to protect what is important to you. Upon request, Activo shall provide customers with further information on our data processing and protection operations.

Law compliance

Activo's policy aims at compliance with the applicable laws, rules and regulations regarding privacy and data protection. Where necessary, we will modify our data processing operations as described in this policy in order to guarantee compliance with the statutory rules.

Useful definitions

Activo uses the following definitions:

- "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- "Personal data" means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is considered a person who can be directly or indirectly identified.
- "Handling" concerns a measure or combination of measures with regard to personal data or personal data settings - carried out by an automated system or otherwise - such as the collection, registration, organisation, structuring, storage, processing or adjustment, creation, reading, use, issue by transferring, dispersing or otherwise making available the same, adjustment or collation, limitation, erasure or destruction.
- "Sensitive personal data" means personal data that is likely to cause harm or specific concern to the data subject when disclosed. Examples of such data are: Specific categories of personal data (as defined below), credit card numbers and other financial data about the data subject, personal identification numbers and location data.
- "Special data categories" mean personal data concerning race or ethnic origin, political beliefs, religious or ideological convictions or union membership, and the processing of genetic data, biometric data with a view to the unique identification of a natural person, data concerning health or data regarding sexual behaviour or sexual orientation.

Collecting data

It is possible that you provide us with information about yourself when using Activo services, for example via our event websites. Such data ("Customer provided personal data") includes:

- Your contact details (name, address, telephone number, email address, etc.);
- Demographic data (age, marital status, composition of your household, etc.);

We are very careful and take extra measures if and when we collect and process sensitive personal data, as required by the applicable legislation. For the sake of clarity, we would like to point out that the applicable legislation may require that other data categories are also handled as sensitive personal data.

Please note

Where reasonably feasible or where required by applicable legislation, we will provide you with (i) specific information on the purposes of processing your personal data, (ii) the identity of the controller, (iii) the identity of any third party to whom the data may be transferred and (iv) other information that may be necessary in order to guarantee you that you can exercise your rights, when we collect or register your personal data.

Consent

Where reasonably feasible or where required by applicable legislation, we will ask your consent before collecting or using your personal data. The request for your consent will be clear and specific, and will state reasonable information on which you can base your decision. We will never take your consent for granted. We will make sure that you have to take action in order to give your consent, in a clear and transparent manner. Your consent is voluntary and can be revoked at any time, for example by terminating a particular service or by contacting Activo. If you do not give your consent, it may be impossible to make use of the services or any part thereof.

Collecting and processing personal data without consent

It may be necessary to collect data from you and use any such stored data with a view to Activo developing products, such as improvements in the quality aspects and security measures of Activo's guarantee obligations and compliance with statutory obligations. When collecting data or using stored data for these purposes, or for similar legitimate interests pursued by Activo, we will usually not ask your consent, unless this is deemed necessary or is required by law.

Third-party applications

Activo is not responsible for the collection or use of personal data in any third-party application or service and we recommend that you carefully read the applicable terms and conditions (and any related integrity policy) before using such service or application. If you have any questions about the use of your personal data by any third party, please directly contact the relevant third party.

Use of data

For most processing operations, you can make us discontinue using your personal data by updating your preferences, by terminating a specific service, or by withdrawing your consent by contacting Activo at the address mentioned in the "Information and access" section below, or by following any other relevant instructions given by us. Unless otherwise stated in the applicable legislation, you cannot opt out in general terms of us processing your personal data if we do so in order to comply with our statutory obligations.

Retention

We will retain your personal data only as long as it is necessary to meet the purposes set out in this policy or otherwise disclosed to you. This means that we will retain the data, when you have consented to us processing

your personal data, for as long as your relationship with us lasts or until you withdraw your consent. If you have withdrawn your consent, it may be possible that we nevertheless need to retain certain personal data during the period that is required to fulfil our statutory obligations and to be able to put forward a defence in legal disputes. If we do not receive your consent for data processing, the data will only be retained insofar as that is permitted by law.

Quality of the data

When processing your personal data, we aim to make sure that the data is correct and up to date. We try to either erase or rectify any incorrect or incomplete personal data. For more information on your right to ensure the accuracy of your personal data in our possession, please go to the "Information and access" section below.

Information and access

As explained in the "Please note" section above, we can provide you with specific information on our personal data processing operations when collecting or registering such data. Once per year, you are entitled to request and receive information on the following at no cost: (i) the personal data relating to you that we process, (ii) where the personal data is collected, (iii) the purpose for processing the data and (iv) the recipients or categories of recipient to whom the personal data is disclosed. Requests for such information must be submitted in writing, must have been signed personally by you, and must state your name, address, and preferably your email address. Moreover, you have the right to ask us to rectify, block or erase any incorrect data that pertains to you. Requests must be sent to the legal entity specified at the bottom of this document. Your requests shall be dealt with in a swift and correct manner. Requests for erasure of personal data are subject to any applicable statutory requirements. If the applicable legislation provides for an administrative fee for complying with such a request, Activo may decide to charge the fee in question to you.

Security

Activo has taken technical and organisational measures to protect your personal data from unintentional or unlawful destruction, unintentional loss, unintentional changes and unintentional disclosure or access and any other unlawful forms of processing.

Disclosure of information to third parties

Activo may disclose your personal data:

- If this is required by law, for example on account of a government investigation, a dispute or other proceedings or request of a legal nature

- Where we in good faith believe that disclosure is required to protect our rights, for example to investigate potential violations of our terms and conditions or to trace, prevent or publish fraud or other security issues
- To partners and other third parties if you have chosen to receive services from them or have consented to them retrieving personal data from Activo;
- To our product and service providers that act on our instructions, such as providers of wireless services, companies that manage and run our internet site, send messages, analyse data, process credit card details or system suppliers that are necessary to process credit card details or financial data; and

Any Activo unit that acts as the controller of your personal data will in principle only disclose your personal data to a third party if it has obtained your consent to do so. In the following situations, however, we may disclose your personal data to others without your consent, provided that it is permitted by law, unless we deem your consent necessary in specific circumstances or your consent is required by law:

- Situations in which disclosure is a statutory obligation; and
- Situations in which disclosure is necessary on account of a legitimate interest that is pursued by Activo (for example to protect our legal rights, as described above).

Data processing on our behalf

We limit access to your personal data to Activo staff and suppliers that must use the information in order to process it on our behalf, and that have a contractual obligation to observe confidentiality and handle your personal data in a secure environment. We aim to select data processing services that best protect your personal data from third parties.

Marketing

We shall not sell or commercialise your personal data, unless we have obtained your consent to do so. We shall not disclose your personal data to any third party for marketing purposes, unless we have obtained your consent for such disclosure. If you have given such consent, but no longer wish to receive marketing materials from a third party, please directly contact the third party in question. We can provide you with information on new products, services, events or similar marketing activities. If you wish to unsubscribe from a specific digital newsletter or similar communication, please follow the instructions in the relevant communication.

Website and cookies

In general, you can visit Activo websites without disclosing your identity or providing any other information on yourself. In order to be able to provide you with certain services or offers, we must store certain aspects of your personal data, such as your name and email address. Moreover, we possibly collect anonymous information (using cookies) on your use of our websites before storage. This information will help us improve our websites or marketing operations. All Activo websites that are accessible to our customers contain information about our cookie use.

Apps

When you register in order to download or use one of our apps, you may send us personal data, such as your name, email address, telephone number or other registration details. Moreover, we may automatically collect certain information, when you use our apps, including technical information about your mobile device and information on the way in which you use the app. Depending on the app you use and not before you have consented to us collecting such information, we will start collecting information that is stored on your device, including contact data, location data and other digital content. More information on the data that we collect is available in the privacy policy and/or separate notice for each app.

Third-party services and apps

The terms and conditions and the privacy policy that apply to some third-party apps that you download, that have been pre-installed or for which you can register, may differ from our terms and conditions/privacy policy. Activo is not liable for the use of personal data in apps or for services provided by any third party. We recommend that you carefully read the user terms and the privacy policy applicable to each individual service and each individual app provided/supplied by any third party before you register, download an app or use any app or service. We recommend that you also explore which choices and options you have with regard to privacy in the downloaded third-party apps.

Children

Our services are not intended for use by children. We do not request or collect personal data from children aged under 13 and we do not engage in advertising. If a child has provided us with personal data, either a parent or a carer can contact us in order to have that data deleted from our files. Please do not hesitate to contact us if you suspect that we may have information on a child aged under 13. If we hear that we unintentionally have collected personal data of a child aged under 13 or another minimum age depending on the jurisdiction, we will take measures to delete such information as soon as possible.

Monitoring

It is required by law that we monitor the operation of our system, including the event websites produced by us. That means that we randomly collect data from our event registration system.

Data protection officer

You can contact Activo's Data Protection Officer using the following contact details:

Activo
attn. Ivo Willemsen
i.willemsen@activo.nl

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