



HYVA PRIVACY STATEMENT

Privacy Statement

This Privacy Statement explains what information the Hyva Group gathers about you, what we use that information for and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

Who decides what happens to your information?

When we refer to the “**Hyva Group**”, we mean Hyva Holding B.V. and its subsidiaries. For the purposes of the EU General Data Protection Regulation (GDPR), the “controller” of any of your personal information is the company within the Hyva Group that you are interacting with or with whom your information has been shared. A “controller” is a company that decides why and how your personal information is processed.

Where this Privacy Statement refers to “we”, “our” or “us”, unless it says otherwise, it is referring to the particular company within the Hyva Group that is the controller of your personal information.

Contact us

If you have any questions or complaints about the way your personal information is processed, or would like to exercise one of your rights set out below, please contact us by one of the following means:

Email: privacy@hyva.com

Post:

For the attention of: GDPR Process Owner

Hyva Holding B.V.

Antonie van Leeuwenhoekweg 37,

2408 AK Alphen aan den Rijn,
The Netherlands

Scope

Hyva Group is strongly committed to protecting your personal information. This Privacy Statement first of all describes how Hyva Group handles personal information collected through www.hyva.com and other Hyva websites, newsletters, apps and other digital platforms that link to this Privacy Statement (collectively referred to as **Platforms**). The Privacy Statement also sets Hyva's approach to personal data privacy with regard to job applicants or our business contacts' personnel data obtained via other channels (for example, during personal meetings or regular customer, supplier or other professional relationships).

Where you are interacting with non-EU controllers

By using our Platforms and providing your personal information to us, you acknowledge you have seen, understood and agree with our Privacy Statement, and, to the extent this consent is necessary and valid under applicable law, you consent to the collection, use and disclosure of such personal information by us and any third party recipients in accordance with this Privacy Statement.

Information we collect about you

When you use our Platforms we may collect information about your usage of the Platform through cookies and analytics tools. We collect click and browse information and we may collect personally identifiable information about you, such as IP address, cookie ID, web browser, country, location, etc. Please see our [Cookie Policy](#) for further information.

If you choose to become a *Registered User* or submit an enquiry, newsletter subscription or contact form as part of the registration process, you will be asked to provide us with personal information through a form. Information we collect may include: name, job title, company name, business address, email address, telephone number, IP address and details related to your business interest.

If you are a job applicant, we will collect all personal information provided in your CV, our communication details and details of your interviews.

From our business contact personnel we usually collect contact information such as names, emails and telephone numbers as well as our communication details and details of your visits to our premises.

It is our policy to collect only a minimum information level required to complete our task or your request.

Ways of collecting information about you

Your personal data may be shared with us in several ways, including, but not limited to:

- ordering a product or service
- submitting our contact form for an enquiry
- requesting a quotation regarding a product offering
- through cookies placed on your computer or (mobile) device when visiting our websites;
- subscribing to our newsletter
- participating in social media (for example, by "liking" or "sharing")
- registering as a dealer or customer
- other communication with us in person, by email, phone or post.

How do we use information about you?

When you provide personal information to us, we may use it for any of the purposes referred to in this Privacy Statement or as stated at the point of collection (or as obvious from the context of collection), including:

- to administer and manage the Platforms
- to sort and analyze user data
- to personalize and enrich your browsing experience by displaying content that is more likely to be relevant and of interest to you
- for recruitment purposes
- to develop our businesses and services
- to manage our relationship and provide you the information
- for marketing, PR, promotional activities and information provision concerning the developments within Hyva Group, its services and products (see Marketing, below)
- any other purposes for which you provided the information to Hyva Group.

We rely on one or more of the following conditions to process your personal information:

- our legitimate interests in the effective delivery of information, products and services to you and in the effective and lawful operation of our businesses (provided these do not interfere with your rights), including for the following purposes:
 - to correspond and communicate with you
 - to create a better understanding of you as a customer or visitor
 - to administer our websites and for internal operations, including troubleshooting, testing, statistical purposes
 - for marketing activities, other than where we rely on your consent (for example, to tailor marketing communications or send targeted marketing messages via social media and other third party platforms) , and we have conducted a “balance assessment” under the GDPR to confirm this
 - for efficiency, accuracy or other improvements of our databases and systems (for example, by combining systems or consolidating records we or our group companies hold about you)
 - for the prevention of fraud and other criminal activities
 - to undertake credit checks for finance
 - for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access



- to comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this in order to be able to comply with your request)
 - to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings
 - for general administration including managing your queries, complaints, or claims, and to send service messages to you.
- to satisfy any legal and regulatory obligations to which we are subject
 - if you have agreed to us processing your personal information for the relevant purpose by providing your consent (see Your Rights in relation to your information / Unsubscribe regarding withdrawing your consent, below)
 - where required to perform a contract with you or in order to take steps at your request before entering into a contract with you (for example, to exchange information for warranties/aftersales)
 - where it is in your vital interest (for example, if there are any urgent safety or product recall notices to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you).

Security of personal information

We have implemented generally-accepted standards of technology and operational security in order to protect personally identifiable information from loss, misuse, alteration or destruction. Only authorised persons are provided access to personally identifiable information collected via the Platforms or otherwise. Such individuals have agreed to maintain the confidentiality of this information.

Cookies

Please see our [Cookie Policy](#).

How do we transfer and store information about you?

As Hyva Group is a global organization with entities around the world, your personal information may be transferred to and stored outside the country where you are located. This includes



countries outside the European Economic Area (EEA) and countries that do not have laws that provide specific protection for personal information.

Where we collect your personal information within the EEA, transfer outside the EEA will be only:

- if the recipient is in a country (or a specified sector within a country – for example, an organization under the EU-U.S. Privacy Shield) that the European Commission recognizes as ensuring an adequate level of protection for personal data
- under standard data protection clauses adopted by the European Commission or other safeguards meeting the requirements of the European General Data Protection Regulation for transfers of personal data outside the EEA.

We may make use of cloud applications to store your data. Your personal data may be processed on our behalf by another service provider and could be stored in different locations around the world. Where external service providers are used, we have contracts in place with the vendors that require them to keep your information secure and not to use it other than in accordance with our specific instructions.

Processing locations and transfers to third party service providers

We may share your personal data between the Hyva Group entities on a confidential basis where required for the marketing, administrative and other business purposes. A list of the countries in which Hyva Group entities are located can be found on our website.

Your information may also be transferred to service providers (third party service providers) to process it on Hyva's behalf. When we transfer personal data, we do so for the purposes for which the information has been submitted, for the purposes listed above under Use of Personal Information, for the administration and maintenance of the Platforms and associated systems, and/or other internal or administrative purposes. We also may transfer personal data to third party service providers of identity management, website hosting and management, data analysis, data backup, security and storage services.

Other disclosures

We may also disclose personal information to third parties under the following circumstances:



- when explicitly requested by you
- when required to deliver publications or reference materials as requested by you
- as otherwise set out in this Privacy Statement.

We may also disclose your personal information to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, as required by and/or in accordance with applicable law or regulation. This includes disclosures outside the country where you are located. Hyva may also review and use your personal information to determine whether disclosure is required or permitted.

How long will we keep information about you?

We will retain your personal information on our systems only for as long as we need it, given the purposes for which it was collected, or as required to do so by law, or to establish, bring or defend legal claims. We keep contact information (such as mailing list information) until a user unsubscribes or requests that we delete that information.

Marketing

Where we are legally required to obtain your explicit consent to provide you with marketing materials, we will only provide you with such marketing materials if you have provided consent for us to do so. Otherwise, we rely on our legitimate interest to develop our relationship with existing customers and grow our business as a legal basis for contacting you. Again, we have conducted a “balance assessment” under the GDPR (which takes into account your interests and fundamental rights, and your reasonable expectations) to confirm we are permitted to do this.

Your rights in relation to your information

You may have certain rights under your local law in relation to the personal information we hold about you. In particular, you may have the following rights:

- to request a confirmation of whether we are processing any personal data on you, and a copy of the personal information we hold about you
- to ask that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete
- to ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information



- to object to our processing of your personal information
- to withdraw your consent to our processing of your personal information at any time (to the extent such processing is based on consent and consent is the only permissible basis for processing)
- to ask us to provide you with a copy of that information in structured, commonly used and machine readable form (where our processing is based on your consent or a need in connection with your contract).

If you would like to exercise these rights or understand if these rights apply to you, please contact us by sending an email to privacy@hyva.com.

Unsubscribe

If you want to unsubscribe from any direct marketing to which you previously opted-in (for example, mailing lists or any registrations) you should look for and follow the instructions we have provided within the appropriate area(s) of the Platforms or in the relevant communications to you. If you do not wish to receive emails or marketing communications from us, you can at any time contact us at privacy@hyva.com to request that such communications cease.

Third party links

The Platforms may link to third-party websites, applications and social media platforms not controlled by Hyva and which do not operate under Hyva's privacy practices. When you are directed to third-party platforms, Hyva's privacy practices no longer apply. We encourage you to review each third-party's privacy policy before disclosing any personally identifiable information.

Right to complain

You have the right to lodge a complaint with the GDPR Process Owner or your local data protection regulator if you are concerned about the way we have processed your personal information. Please visit that regulator's website for further details. You may contact our GDPR Process Owner to assist you in identifying that regulator. Please note that the regulator may recommend that steps are taken to resolve the matter with the Hyva Group before involving the regulator itself.

Changes to this Privacy Statement



We may update this Privacy Statement at any time by publishing an updated version. The new modified or amended Privacy Statement will apply from that revision date. Therefore, we encourage you to review this Privacy Statement periodically to be informed about how we are protecting your information.

This Privacy Statement was last modified 14 May 2018.