

### **Privacy Policy**

Zanders & Partners Holding B.V. and its subsidiaries (hereinafter referred to as "we", "us" or "Zanders") are committed to protecting and respecting your privacy.

This policy (together with the Terms of Service, Cookie Policy and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the Zanders' websites, and its published content on the Zanders' websites, which are;

- www.zanders.eu
- www.zanders.nl
- www.zandersinside.com
- www.careeratzanders.nl
- www.careeratzanders.com

you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation (Regulation EU 2016/679), the data controller is Zanders B.V. of Brinklaan 134, 1404 GV, Bussum, The Netherlands.

#### Visitors to Zanders' websites

When someone visits Zanders' websites we use third party services (like Google Analytics and ClickDimensions / CRM Dynamics 365) to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the Zanders' websites. Specifically, the information we collect will look at;

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages and services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

This information is processed in a way which can identify a visitor indirectly, via the records of the IP address of the visitor. Where we do collect personally identifiable information directly through our Zanders' websites, we will make it clear what we intend to do with it and how we store the data.

# When you complete a Contact Form through Zanders'websites

We use a third party marketing automation platform, ClickDimensions / CRM Dynamics 365, to host our contact forms across the websites. When you fill out a 'Contact Request', ' 'Sign up Form', 'Get in Touch' or 'Send your for RFP' form on our website we will use it to ensure the advice or information you are requesting of us is as accurate as possible. We will store information collected through contact forms for a minimum period of 5 years and we will not share your information with any other organisations.

In addition to the information we collect from you or your organisation via our contact forms on the websites we will also collect information stored on our systems. From a marketing perspective we retrieve information from our client relationship management database. When making an enquiry into our services we will look at your information history in our CRM Dynamics 365 system to understand as much about the nature of your interest and organisation as possible to ensure we can route your enquiry to the most suitable consultant. Information includes, your browsing history on our websites, the means by which you found our websites, any interaction with your organisation or colleagues regarding (potential) projects, any information about interest in or participation at our own or third party events, any content you may have previously viewed or downloaded and the data you have provided us in any contact or download forms such as name, email address and job title.

We may also collect information from the following third party services, for the following reasons;



- financial business databases: When you make an enquiry about our services, it's important for us to understand as much about your organisation as possible, this helps us to route your enquiry to the most suitable advisor (this could be based on industry or geographic location for example). Information contained within the database includes; company structure, locations, turnover, employee counts, industry.
- official registration databases: When you make an enquiry about our services, it's important for us to understand as much about your organisation as possible, this helps us to route your enquiry to the most suitable advisor (this could be based on industry or geographic location for example). We use different official databases as a source of due diligence on prospective customers, typically we look at years incorporate, turnover and assets.
- external Linkedin: When you make an enquiry about our services, we may conduct further research into you and your organisation using Linkedin. This is to help us understand as much about you and your organisation as possible, such that we can provide the best possible advice with regards to our services.

The processing of personal data collected via contact forms is lawfully done on the basis of legitimate interest. The legitimate interest being direct marketing and the provision of relevant, requested services information from us to you.

## When you request / download content from Zanders' websites using a download form

We use a third party marketing automation platform, ClickDimensions / CRM Dynamics 365, to host the download request forms across our website. When you fill out a 'Download' form on our webpages, we will hold this information for a minimum period of 5 years. We use this information to measure your levels of engagement with our company and its services, to profile your possible interests and to help us serve you with the best possible content and browsing experience on our webpages. You will have the option to opt-out of all email communications by selecting the 'Unsubscribe' option contained within all of our direct electronic communications.

The processing of personal data collected via download forms is lawfully done on the basis of legitimate interest. The legitimate interest being direct marketing and the provision of relevant, requested product and services information from us to you.

## **Direct Marketing**

Under the terms of the General Data Protection Legislation (GDPR), organisations are able to process personal data for legitimate interests, provided that the interests or fundamental rights and freedoms of the data subject are taken into consideration. Under the GDPR, direct marketing is considered a legitimate interest.

Zanders processes personal data for the purposes of direct marketing, predominantly electronic direct marketing (email). Zanders can use third party providers for the provision of personal data use for electronic direct marketing. In case third party providers are used Zanders will ensure a legitimate Data Process Agreement is in place.

In addition to the above, Zanders will process data collected from previous Contact Forms (as previously outlined), store them in our Marketing Automation and CRM (ClickDimensions / CRM Dynamics 365) platforms and communicate periodically with people from these data sources, with news and updates on services and content we believe could be of interest to them.

If you receive an email from us and you don't want to, you can opt-out of all Zanders' electronic direct marketing by selecting the 'Unsubscribe' link that is included in all of our communications. Equally you can request to be removed from our databases by contacting marketing@zanders.eu (see the 'Your rights' section of this privacy notice for more detail on this).

We have undertaken an assessment to ensure that our reliance on this communication being for our legitimate interest is valid. copy of our legitimate Interest assessment is available on request, at no charge by contacting marketing@zanders.eu.



## **DISCLOSURE OF YOUR INFORMATION**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in article 2:24 of the Dutch Civil Code.

We may share your information with selected third parties including credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Zanders & Partners Holding B.V. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Uses and other agreements; or to protect the rights, property, or safety of Zanders & Partners Holding B.V., our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and risk reduction.

In these instances, processing and disclosure of your information is lawfully done on the basis of legitimate interest, specifically, business or group restructuring and legal obligations.

### Where we store your personal data

All information you provide to us is stored securely on our own network and third party platforms;

- ClickDimensions (Marketing automation platform)
- Microsoft Dynamics CRM 365 (Customer Relationship Management platform)

In all instances, data is stored in European Data Centers. Access to information in our systems is restricted to staff members within Zanders with sufficient user privileges.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by unsubscribing from electronic communications using the unsubscribe link on all of our emails or by requesting in writing to marketing@zanders.eu.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites can have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You also have the right to;

- Request that any personal information that we collect and hold on you be updated or corrected.
- Request a copy of any personal information that we collect and hold on you.
- Request that any personal information we hold on you be transferred to another data controller.
- Request that we restrict the uses for which we process your personal data (sales, marketing, email communications)
- Object to any of the ways that we process your personal data.



• Request that we delete any or all of your personal data.

You may exercise any of the above rights by getting in touch with us through the following routes;

- By email to marketing@zanders.eu
- In writing to the Data Controller,

Zanders B.V. Brinklaan 134 1404 GV BUSSUM The Netherlands

#### Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to marketing@zanders.eu.

## Complaints procedure

If you have any objections to the way in which we process your personal data you can raise them with us directly by contacting us through the following routes;

- By email to marketing@zanders.eu
- In writing to the Data Controller,

Zanders B.V. Brinklaan 134 1404 GV BUSSUM The Netherlands

If you wish to lodge a formal complaint with our supervisory authority you can do so by contacting Dutch DPA (Autoriteit Persoonsgegevens).

#### Cookie Policy

Our websites and direct emails use cookies to distinguish you from other users of our content. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites. By continuing to browse the sites, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Cookie expiration: All cookies are set to expire after one year from the first day of acceptance. We periodically review our cookie expiration date, any changes to which will be reflected in this privacy policy.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.



- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

If you would like more information about the individual cookies we use and the purposes for which we use them please contact us at: marketing@zanders.eu

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.