

PRIVACY POLICY FOR NETCODE CUSTOMERS

1. INTRODUCTION

This privacy policy is for services offered by Netcode and governs the privacy of its users who choose to use it. The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way our company processes, stores and protects user data and information will also be detailed within this policy.

Netcode is a Data Controller for the purposes of EU General Data Protection Regulations, which are effective 25th May 2018. Our contact details can be found on this website. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the local supervisory authority for data protection issues. We should be grateful if you would contact us first if you do have a complaint, so that we can try to resolve it for you.

2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

3. HOW WE COLLECT YOUR PERSONAL DATA

We can collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
 - order our products or services;
 - create an account on our site;
 - subscribe to our service or publications;
 - request resources or marketing be sent to you;
 - give us feedback.
- **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - analytics providers such as Google based outside the EU;
 - advertising networks such as Facebook based outside the EU; and
 - search information providers or tracking info providers such as HOTJAR based outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at info@netcode.nl

Purposes for Processing your Personal Data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at info@netcode.nl if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services

Purpose/Activity	Type of data	Lawful basis for processing
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communication (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

Marketing Communications

You could receive marketing communications from us if you have:

- i requested information from us or purchased goods or services from us; or
- ii if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- iii in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by emailing us at info@netcode.nl

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at info@netcode.nl.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Other companies in our group who provide IT, billing and system administration services and undertake leadership reporting.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the E.U. and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Governmental and non-governmental authorities that manage market Codes of Conduct and customer complaints.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at the website of the local privacy authority.

If you wish to exercise any of the rights set out above, please email us at info@netcode.nl

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts

of this website may become inaccessible or not function properly.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. **By using the web-site you are agreeing to using cookies.** Cookies contain information that is transferred to your computer's hard drive. Our sites may use one or more of the following sorts of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around a website when they are using it. This helps us to improve the way our websites work, 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 a website. This enables us to personalise our content for you and remember your preferences.
- **Targeting cookies.** These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the advertising displayed on it more relevant to your interests.

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.

Examples of third party cookies providing external services include:

Google Analytics, Twitter, Facebook, Pinterest, LinkedIn, Google+, Gmail, HotJar

Further information about them may be obtained from their respective websites.

If you wish to find out more about cookies, you may like to visit

<http://www.aboutcookies.org/> which is an independent third party resource that explains what cookies and clear gifs are and how you may manage them. Please note that we are not responsible for, and have no control over the content of this third party website.

You may block cookies by activating the setting on your browser that allows you to disable the use of them. 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 websites.

Except for strictly necessary and functional cookies, cookies will expire after within two years.

12. Version.

This policy is date May 18, 2018.