

1 PRIVACY STATEMENT

As Holland Integrity Group B.V. (HIG) we process personal data.

This Privacy Statement sets out our policy on how we process your personal data. This may be data we acquire through your use of the services of HIG, as well as data that we obtain in the execution of our work, such as investigations. This data may come directly from you, may have been transferred to us by clients, may have been collected in some other way while carrying out our assignment - such as from public sources - or may otherwise have been made available to us.

The personal data processed by us is carefully handled and secured. In doing so, we comply with the requirements of the General Data Protection Regulation (GDPR), the Dutch General Data Protection Regulation Implementation Act (UAVG), and other applicable legislation on the processing of personal data.

Holland Integrity Group B.V. is the data controller in respect of the data processing referred to in this statement. The contact details of HIG are:

Holland Integrity Group B.V.
Teleport Towers
Kingsfordweg 151
1043 GR Amsterdam (the Netherlands)

www.hollandintegritygroup.nl

Our activities include working as a detective agency as referred to in Article 1(f) of the Dutch Private Security Organisations and Detective Agencies Act (the WPBR). We hold a licence (number POB 922) issued by the Dutch Ministry of Justice, as stipulated in Article 2 of the WPBR. In doing so, we comply with the code of conduct applicable to private investigation firms.

The Data Protection Officer

Our data protection officer is available to you for any request, question or complaint about the handling of your personal data:

Holland Integrity Group B.V.
Attn: Data Protection Officer
Teleport Towers
Kingsfordweg 151
1043 GR Amsterdam
E-mail: fg@hollandintegritygroup.nl

For what purpose do we process your data?

We process personal data in the context of the services we offer, such as integrity screenings of future employees, business relations or clients. The data may also relate to directors, attorneys-in-fact, supervisory directors or shareholders who may indirectly become involved in a screening. In addition to integrity screenings, data is also processed in regular fact-finding missions and investigations involving, for example, the recovery of lost assets.



Personal data is processed in the context of efficient and effective business operations by HIG, including:

- a) recording the results of work carried out at the request of a client and reporting the findings of the relevant investigation/screening to the client;
- b) querying the information recorded pursuant to the activity referred to under (a) for the purpose of carrying out background checks and when accepting new assignments;
- c) performing or commissioning analyses of pseudonymised data for statistical and/or research purposes; and,
- d) reporting a suspected criminal offence to an investigating officer.

We may process your data on the basis of your explicit consent, an agreement, a statutory obligation, or 'legitimate interests' of HIG or a third party. When we process your data on the basis of 'legitimate interests', we explicitly consider your privacy.

We only process your data insofar as this is necessary and we will make sure that we do not store more data than required. If we process your data on the basis of your consent, you can withdraw this consent at any time. For further information, see below under 'Your rights'.

Recording data of website visitors

If someone only visits the website, we are not interested in names or other data that tells us anything about the identity of these visitors. What we do collect is statistical data, which tells something about the use of this website and which is important for improving the website. This information can be used to improve the functioning of the website.

Recipients of personal data

HIG only provides data to third parties if this is necessary in view of the objectives for which we process the data. We provide this data to third parties if you have given your consent, if this is necessary for the performance of a contract, if we have a statutory obligation to do so, and/or if we are otherwise required to do so, for example, as a result of a lawsuit.

In addition to our own employees, HIG sometimes engages third parties to carry out work involving data processing on behalf of, and under the responsibility of HIG. If these parties work on behalf of HIG, we remain responsible for the way in which these parties handle your data, and we conclude agreements on this with such parties.

In the event that we instruct third parties to process personal data, we will only work with processors who provide sufficient guarantees that appropriate technical and organisational measures are in place so that the processing complies with statutory requirements and the protection of your rights is guaranteed.

Data which we examine as part of our services is checked by us within the framework of the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft) and, where necessary, reported to the Dutch Financial Intelligence Unit (FIU). This is on the basis of a statutory obligation.

In some situations, it may be necessary or mandatory to provide data to the police and judicial authorities.

HIG may use the services of parties established outside the European Economic Area (EEA). HIG will only transfer personal data if this is in accordance with the applicable regulations for the transfer of personal data to countries outside the EEA, and will, if so required, agree with these parties upon standard clauses approved by the European Commission.



Retention period

We only process your personal data for as long as it is necessary for the purpose for which we are processing it. Afterwards, the data will, in principle, be deleted, unless we have a statutory obligation to retain the data for a longer period.

In principle, we retain data obtained for the purpose of a background check or an integrity screening for a period of twelve months following reporting. In the case of a more extensive investigation, for example regarding fraud, the data will be kept for up to 5 years, unless pending or impending proceedings require a longer retention period.

If you are a client of ours, we will in principle keep your data for 5 years following completion of the assignment, unless we have agreed with you that it be kept longer or if the law prescribes a longer retention period, for example the 7-year retention period prescribed by the tax authorities for certain data. We retain data pertaining to our own records for 7 years, or as much longer as necessary in connection with financial settlement or any obligation to do so.

Your rights

Access: Upon request, you can have access to the recorded personal data concerning you. This means that you can ask what personal data we have about you and what we use that data for.

Rectification: If the information we keep on you is incorrect, you have the right to request that it be corrected. You can contact us for this. You will then receive a reply from us within one month.

Objection: You can also object to the use of your data if the processing of such data is not necessary for the performance of a contract with you, or for the fulfilment of a statutory obligation.

Withdrawal of consent: If you have previously consented to the processing of specific personal data, you can change or withdraw your consent at any time without stating reasons.

Erase: The law grants you even more rights. For example, in some cases you have the right to have your personal data erased. This is possible, for example, if you have previously given HIG (explicit) consent to use your data, but now wish to withdraw that consent. It is also possible to have your data transferred to another party under certain circumstances.

The above rights are in many cases subject to conditions. We have to weigh things up, meaning that we may not always be able to comply in full with your request.

Further to a request, we will provide you with information on the actions we have taken in response to your request as soon as possible, but in any event within one month of receiving your request. We may extend this period by two months if your request is complex. In that case, you will be notified accordingly.

How to submit a request?

If you wish to exercise your rights, please submit a request to our Data Protection Officer.

Send your request (by letter or e-mail) to:

By post: Holland Integrity Group B.V.

Attn. the Data Protection Officer

Teleport Towers

Kingsfordweg 151

1043 GR Amsterdam

By e-mail: fg@hollandintegritygroup.nl

Please ensure that your name, address and contact details are included in the request. If you make a request by post or e-mail, we want to be sure that it is you making the request. Therefore, in order to establish your identity, we may ask you for additional information.



You can also contact the Data Protection Officer for any other questions or complaints about the handling of personal data concerning you. If you have any further questions or complaints, please contact the Dutch Data Protection Authority in The Hague. This can be done via the website of the Authority for the Protection of Personal Data (<https://autoriteitpersoonsgegevens.nl>)

HIG does not take any decisions based on automated processing without human intervention which have legal consequences for the data subjects or which otherwise significantly affect them.

Data protection

We have technical and organisational security measures for the protection of your data in place. These measures are constantly reviewed and we keep up with technological developments. In addition, our employees are obliged to observe confidentiality in respect of the data.

Links

If you use external links, which are offered in the context of our websites, this privacy statement does not extend to those links. Where we provide links, we strive to ensure that they also meet our data protection and security standards. We have no influence on whether other providers comply with any applicable data protection and security regulations. Therefore, please consult the privacy statements available on the websites of such other providers too.

Changes to our data protection provisions

We reserve the right to change our security and data protection policies, for example, if so required by technical and/or legal developments. Please check the privacy policy regularly for any updates.

12 January 2024

COOKIE STATEMENT

Cookies and website

The storage of particular cookies on your device requires the visitor's consent in advance. Those cookies have an impact on your privacy. Other cookies with limited impact may be stored on your device without consent, for example if they are necessary for the functioning of the website, or analytical cookies for our own use. These cookies ensure that the technical aspects of the website work properly and that the content is optimised.

What cookies do we use?

We don't use cookies. To analyse how our website works, we use Simple Analytics. Simple Analytics collects and processes anonymous metrics and provides us with information to help us understand how visitors use our website and where our traffic comes from. Simple Analytics allows us to improve our website and create a better experience for our visitors. We do not track or profile visitors and we do not serve personalized advertising. We do not share this data with anyone.

Simple Analytics is a privacy-friendly tool and does not collect your personal data. You can learn more about the way Simple Analytics processes data from its website.

If we intend to store cookies on your device, we will amend this statement

We may update the information in this statement if there are new developments. This Cookie Statement was last updated on 12 January 2024.

