

## PRIVACY STATEMENT ALTURA

### INTRODUCTION

Altura BV ( “**Altura**” and “ **we**”) is committed to handling your data responsibly. Altura strives to comply with all applicable laws and regulations regarding the protection of personal data.

“**Platform**” means the Altura platform available via the URL [www.altura.io](http://www.altura.io) and any other URL leading thereto (“ **Website** ”).

In this Privacy Statement, we explain, among other things, which data of yours is processed when you use the Platform, what the purpose of that processing is, with whom your data is shared and what rights you have. “ **You**” means a user of the Platform.

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### PROCESSING CONTROLLER

Altura BV is the controller under the General Data Protection Regulation (GDPR). Altura BV is registered with the Chamber of Commerce under number 82677530 and can be reached by post and e-mail: Jaarbeursplein 6, 3521 AL Utrecht, [support@altura.io](mailto:support@altura.io)

### APPLICABILITY

This Privacy Statement applies to every use of the Platform and when you contact us.

### WHICH PERSONAL DATA WE PROCESS AND ON WHICH BASIS

“**Personal data**” is any information about an identified or identifiable physical person.

We collect and process information and documents that may contain personal data. It depends on how you use our Platform if and when this is the case. In the following cases, we may process your data.

#### Contact us

You can contact us via the contact option on our Website. You can also contact us directly by e-mail. In both cases, we have at least your email address and name. The further information you provide to us may also contain personal data. We use this personal data to contact you so that we can answer your question and process it. If you are not a registered user with an account, we will delete your data once your issue or question has been resolved and you no longer wish to use our services. We often already have this information for users with an account in a different context, and their information is therefore often kept for a longer period (see also under Create an account). We process this data based on our legitimate interest to process your request and to contact you about it.

## **Create an account**

If you want to use our Platform, you are required to create an account. We need some information from you to create your account. In specific cases, this may also be personal data (such as your name, e-mail address or telephone number of an employee). Without this information, we are not able to offer you our services. This data is processed based on the execution of the agreement that we entered into with you and based on our legitimate interest in maintaining contact with you about our services.

## **Use of tools**

You can use various tools via our Platform. You can also upload documents related to a tender. Such documents may contain personal data.

When you use one of our tools, we have a dual role about the data you provide to us through them. You have control over the data you provide to us and we process it. By uploading the documents and using our tools, you instruct us to process specific data of your choice (the use of a particular tool). Our processing agreement applies to this processing (see our separate processing agreement).

Additionally, the data you provide is utilised in a way defined by us, specifically for the enhancement of our services and products, as well as the advancement of our algorithms. This improvement directly benefits our customers. In this context, we act as the controller of the data processing, and this privacy statement governs such processing. This data processing is carried out on the foundation of our legitimate interest in perpetually upgrading and evolving our services and products, ultimately serving the best interests of our customers.

## **Visiting the Website**

Every time you visit our Website, data is collected in the background using technologies such as cookies (see also our Cookie Statement).

Cookies are simply small files that are sent with pages from the Website and stored by your browser on the hard drive of your device. More information about enabling, disabling and deleting cookies can be found in the instructions and/or using the help function of your browser.

For example, cookies and similar technologies may collect your IP address, information about your browser and device, and information about which pages you visit and how you navigate our Website.

We use this data, among other things, to compile user statistics. They are processed based on our legitimate interest in maintaining our Website, us

To improve the Platform and our services and to improve the user experience thereof.

## **WITH WHOM WE SHARE PERSONAL DATA**

To deliver our Platform and services at their best, we rely to some extent on external parties. These third parties, like our hosting provider, perform services at our request and on our behalf. In these cases, these entities are classified as processors. Such processors might occasionally need to access specific personal data belonging to users of our Platform. We establish agreements with these processors that contain measures to safeguard your data.

We may need to share your data with regulatory or public authorities, like judicial bodies, if we receive a lawful request requiring us to do so.

Furthermore, some of our processors might be based outside the European Economic Area (EEA), or they may use staff or servers located in countries outside the EEA. As a result, your data may be transferred to countries beyond the EEA. We ensure such transfers are only made when the protection of your data is adequately secured. Our processing agreements are designed to guarantee that our processors adhere to this standard of data protection.

We never sell your data to any third parties.

## SECURITY

We are committed to protecting and securing your data to the best of our ability, guarding against loss and unauthorised processing. To achieve this, we implement appropriate technical and organisational measures, considering the latest advancements in security technology, to ensure a level of security commensurate with the risk. Our practices align with the ISO 27001 security standards.

At Altura, access to personal data is strictly limited to employees whose job responsibilities require it, and they are bound by confidentiality obligations. Additionally, the IT infrastructure of our Platform is professionally safeguarded. We have established procedures to respond to data breaches or suspicions of a breach. In the event of a data breach, and where legally required, we will notify the affected individuals and the Dutch Data Protection Authority.

## STORAGE PERIOD

The personal data that Altura processes will not be kept for longer than is necessary for the processing, as stated in this Privacy Statement. However, personal data may sometimes be retained for longer if we are required to do so based on a legal obligation. For example, we are obliged by tax regulations to keep certain data for seven years. Such data will then only be permanently deleted after that period has expired. We may also completely anonymise data over time and then use it for research. Because anonymous data is not personal data, we no longer need a legal basis for this.

## YOUR RIGHTS

As the individual whose personal data we process, you possess various rights that you can exercise at no cost. If you wish to utilise any of these rights, please contact us by sending an email.

You have the following rights:

- **Right to information:** through this Privacy Statement we provide you with information about the processing of your data, for example about our identity, the purposes for which and how we process your data, the rules that apply to it, about the rights that you have and how you can influence it.
- **Right to inspect data:** you have the right to inspect the personal data that we hold about you.
- **Right to Rectification:** You are entitled to request corrections to your data if it is found to be inaccurate or incomplete. Additionally, you have the right to request adjustments to your data if it is not pertinent to the purpose for which it is being processed by us, or if we have processed your data in contravention of legal requirements.
- **Right to deletion of data:** you have the right to have certain personal data deleted. For example, when your data is no longer necessary for the purposes for which we received it, you object to the processing or when your data has been processed unlawfully by us. However, we cannot always delete all requested data, because we are (or may be) obliged to keep certain data about you.
- **Right to restriction of processing:** this means that in certain circumstances we may (temporarily) not process or change your data. This is the case if you dispute the accuracy of the data if you believe

that the personal data are no longer necessary for the purposes, or if you believe that the processing of your data is unlawful.

- **Right to object:** you have the right to object to the processing of your data if your data is used for purposes other than necessary for the execution of an agreement or necessary for compliance with a legal obligation.
- **Right to data portability:** if you have provided your data to us, you have the right to data portability in certain cases. This means that we will provide your data to you in a structured, common and machine-readable manner when you request us to do so.

To prevent us from providing personal data to anyone other than you, we may ask you to identify yourself. We can only process requests that relate to you. We will respond to your request within 14 days of receiving your request.

## COMPLAINTS

If you have any questions about our privacy policy or if you believe that we are processing or have processed your data incorrectly or carelessly, please contact us to resolve your objection or complaint. If we are unable to resolve your complaint satisfactorily, you can file a complaint with the Dutch Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

## CHANGE OF THIS PRIVACY STATEMENT

We have the right to change this Privacy Statement without prior notice. This may be necessary, for example, because we have implemented changes in our business model. After all, new processing takes place to comply with new regulations.

The most recent version of our Privacy Statement can always be consulted on our Website. If changes are made that are material to our users, we will also notify users with an account whose email address we have available by email.