

# Privacy Policy

**Last update: November 2023**

This privacy policy is drafted to provide you with information on how we secure your data. Any personal data collected by us is considered confidential and must be adequately secured. We adhere to the General Data Protection Regulation of the European Union (GDPR) in all of our data handlings.

In this privacy statement we explain how we process your data. If you have any questions, remarks or complaints please contact us at [info@samenslimmer.ai](mailto:info@samenslimmer.ai).

## **This Policy describes:**

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## **1. What is personal data?**

The GDPR describes 'personal data' as information that an individual can be identified from either directly or indirectly by combining information so that it enables identification.

## **2. Who is processing your personal data?**

To support your use of the website of Samen Slimmer, we, Samen Slimmer an alliance by Keen Venture Partners B.V., with its office at Passeerdersgracht 19a, 1016 XG, Amsterdam, The Netherlands, Slimmer AI Labs B.V., with its office at Atoomweg 6b, 9743AK, Groningen, The Netherlands, and the Dutch Founders Fund B.V., with its office at Fred. Roeskestraat 100, 1076 EE, Amsterdam, The Netherlands, need to register some of your information. We consider taking proper care of your data of utmost importance. We treat all information you provide as confidential.

### **3. What data do we collect?**

We collect personal data to deliver our services. This includes:

- Personal information: name, gender, date of birth, age, passport details, identification documents, photos, signature, nationality, and professional credentials or background
- Contact information such as email address
- Employment or business information
- Information about your visit to our website: Internal Protocol (IP) address and details regarding your device or browser such as screen resolution, browser type, country, and language
- Preferences and views

Your personal data may be collected by us directly from you or through a third party. By voluntarily providing us with your personal data, you are consenting to our use of it in accordance with this Policy. When you visit our websites, we may use cookies and other technologies to collect personal data. Read more about the use of cookies in our [Cookie Policy](#).

### **4. For what purposes is information collected?**

We collect your data for these purposes:

#### **Website visit**

We collect general visitor data from our website. The processing of data is

necessary for providing a properly working website. The scope of data processed is elaborated on below. This information is also analysed to optimise the website and protect it against (DDoS) attacks. The information mentioned is processed based on our legitimate interest to provide a properly optimised and functioning website. For more information on Cookies and similar tracking technologies we use on our website, please take a look at our Cookie Policy.

### **Submitting the form on our website**

When you contact us via the form you can access through the "I have an idea and wanna build" or "I don't have an idea but wanna build" button, we use the personal information you provide to us to be able to handle your request properly and answer your questions.

### **Events**

By attending events hosted by Samen Slimmer, you permit us to make on-site recordings and photographs, in which you may be included. The videos and photos may be used in marketing materials, as long as they are related to the article subject. If you would not like to be included in any form of video or photographs, please contact us at [info@samenslimmer.ai](mailto:info@samenslimmer.ai) or our team member at the event you are attending.

## **5. What security measures do we take to protect data?**

In order to protect your personal data, we have ensured appropriate organisational and technical measures to protect your privacy. These security measures aim to prevent loss, abuse, unauthorised access, or modification of your personal information.

Our contracted third parties are also obliged to ensure the same level of security by implementing appropriate organisational and technical measures. To ensure the continuous upkeep of high standards of information security and safe handling of data, we perform regular evaluations of all of our vendors.

## **6. Children's privacy**

The website of Samen Slimmer has no intention to process information of users younger than 16 years of age unless they are permitted to use the website of Samen Slimmer by their legal guardians. However, we have no reliable way to determine the actual age of users. Therefore, we advise parents to be involved in their children's online internet activities to prevent any data from being gathered without their permission.

If you feel that we gathered personal data from minors without proper permission, please contact us at [info@samenslimmer.ai](mailto:info@samenslimmer.ai). We will remove the data upon your request.

## **7. When can we provide your personal data to third parties?**

Samen Slimmer does not sell your data to third parties, nor do we share your personal information with any third parties if it is not permitted under current legislation. With all data sharing, we always ensure compliance with the applicable data protection legislation. Sharing of data in any case will be as limited in scope and size as possible, considering the purpose for which it is shared.

The purposes we may share data with third parties are:

- Contractually engaging them to process certain data,
- it is necessary for providing services under an agreement,
- we have your permission for such sharing,
- it is based on our legitimate interests, or
- we are required to do so by law.

Such third parties that process your personal data on our behalf are:

- Our cookie suppliers (this is detailed in our Cookie Policy)
- Our contracted vendors
- Payment service providers (and collection agency)

We will never give your personal data to other companies or institutions unless we are legally obliged to do so or have entered into contracts with them.

### **Data transfers to third countries**

Should personal data be processed outside of the EEA by our vendors, we shall make sure all required safeguards are in place. In practice, this means contractual safeguards such as the standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (SCCs), and any technical safeguards recommended for the processing of such data by the Dutch Data Protection Authority (e.g. anonymisation). With our analytics provider Google Analytics all data is anonymised as per “Privacy-friendly setting of Google Analytics manual” of the Dutch Data Protection Authority.

## **8. What are your rights regarding your data?**

Samen Slimmer follows applicable laws and regulations in all of its processing activities. As an EU entity, the General Data Protection Regulation (GDPR) is at the core of our data handling and ingrained in our privacy policy. The GDPR grants data subjects certain rights in relation to their data. You may practice your rights on the data we have collected of you by contacting us at [info@samenslimmer.ai](mailto:info@samenslimmer.ai). When contacting us, make sure to clearly indicate who you are, so we can be sure we do not change or delete the data of the wrong person. We have a legal obligation to verify identity with every request we receive. Request for proof of identity will be considered proportionally to the importance of the data, including but not limited to requested formal proof of identity.

### **Data subject rights in the GDPR:**

#### **Right to information**

You have the right to know if and what kind of information personal information of yours we process. You may request a copy of your personal information from us for free, as described above. We reserve the right to charge a reasonable fee for any additional copies you request.

### **Right to correction of personal information**

We aim to keep all of your information accurate and up to date. In case the personal data of yours that we process is inaccurate, you may request us to correct this information.

### **Right to deletion**

You have the right to request us to delete the personal information of you that we have. Samen Slimmer shall honour your request, and only decline if there is a legitimate reason for us to retain your personal information. For example, we may have to retain this information due to legal retention periods or if we want to exercise a legal claim.

### **Right to data portability**

You may request a transfer of your personal data by us to another party in case the processing is based on your consent or a contractual relationship for providing services to you, minding technical limitations that may limit such requests. This option entails that we send your information directly to the third party.

### **Right to restriction of processing**

You may request the (temporary) restriction of the processing of your personal information by us. For example, this may be in your best interest if you dispute the correctness of the information we have of you and want us to stop processing that information until we have checked the correctness of the information.

### **Right to object**

You have the right to object to the processing of your personal data by us. Samen Slimmer shall honour your request, and only decline if we demonstrate a compelling legitimate interest for such processing. Samen Slimmer will respond to any of these requests within 30 days. Should the time be extended due to the complexity of the request, Samen Slimmer will inform you about it within the 30 days.

## **9. Changes to this policy**

Samen Slimmer reserves the right to update this policy. We advise you to consult this policy periodically, to be informed of any changes. Changes to this Privacy Policy are effective from the time they are posted on this page.

## **10. How to contact us for any concerns or complaints**

For any questions or complaints, please contact us at [info@samenslimmer.ai](mailto:info@samenslimmer.ai) or to Keen Venture Partners, Passeerdersgracht 19a, 1016 XG Amsterdam, The Netherlands.

## **11. How to make complaints to the Data Protection Authority**

Samen Slimmer takes data protection very seriously and will try its best to handle any request or complaint to your satisfaction. You always have the right to file a complaint with the supervisory authority responsible for the protection of your personal information.

For the Netherlands, this authority is:

Autoriteit Persoonsgegevens

Postbus 933742509 AJ DEN HAAG

<https://autoriteitpersoonsgegevens.nl/>