



Privacy statement of In Tense B.V.

### 1. Who is In Tense B.V.?

In Tense B.V. ("In Tense") - a Dutch limited liability company with its seat in Zwolle, registered at the Chamber of Commerce # 05078336 - is a training and coaching institute that operates worldwide in the field of safety, health and security.

In Tense was founded on the conviction that human suffering and material damage can and should be prevented. This conviction lies at the heart of the company. Everything In Tense develops and undertakes is motivated by the same goal: making sure the road to safety performance is not paved with work-related accidents and black swans.

In Tense built its business on the following statement: "We believe that human suffering and material damage caused by work-related incidents and accidents can and should be avoided. That is fundamental to all that we do and embedded in our organization."

In Tense treats the personal data of those visiting the website and those participating in trainings with care. Personal data are carefully processed and safeguarded. In Tense complies with the provisions of the Dutch Personal Data Protection Act, "*Wet bescherming Persoonsgegevens*" (hereinafter "Dutch DPA") and as of May 25, 2018 with the provisions of the General Data Protection Regulation ("GDPR") and its national implementing and supplementing legislation, as well as any other future applicable legislation.

### 2. Importance of this Privacy and Cookies Policy

In Tense is committed to ensure the privacy and safety of Personal data. This policy provides general information about how In Tense collects and processes Personal data, how they can be used and to whom they can be disclosed.

### 3. Which Personal data does In Tense collect and process?

In Tense collects and processes information from natural persons ("Personal data"), when it regards:

- its employees (name, address, telephone number, bank account, BSN, salary, agreed benefits, copy ID, medical issues, information regarding experience and education/CV and appraisals, worked hours, travel history, travels for trainings etc.) to execute the employment agreement with them;
- Candidates for an employment agreement or for a freelance agreement/assignment (name, address, telephone number, information regarding experience and education/CV);
- Individual persons with whom In Tense is engaged in doing business (in case of legal entities the name of the legal representative and contact details and function/role within organization);
- Participants in the trainings of In Tense (names and if certificates are issued also date of birth, presence in the training, scores/results, questions, emails) to execute the training as per agreement with the employer of the participants.

A total overview of data that are collected/processed is registered in the data register in which In Tense records the processing of Personal data per business department.



In Tense does not collect, process or store sensitive personal information such as race, membership of a trade union, religion, sexual preferences, etc., except for medical information of their employees/trainers that work on freelance basis.

In Tense does not collect information from visitors of its website.

#### **4. Data controller**

In Tense is data controller and therefore responsible for the collection, processing, storage and security of any data as meant in the Dutch Act on Data Protection/GDPR.

#### **5. Legal ground and purpose for processing of Personal data**

In Tense processes Personal data and uses them for the following purposes:

- Employee/salary administration;
- Tax/finance administration;
- To provide safety and security trainings;
- For responding on queries and to provide relevant information on its business/on safety & security.

The legal ground for these processing activities are:

- To execute agreements (such as employment agreements) with those persons;
- In Tense processes Personal data when a natural person applies for a job ("Candidate"). In Tense has a legitimate interest to process this information to process the job application and may disclose such information for example to take up a reference when In Tense obtained consent of the Candidate;
- In Tense also processes Personal data to fulfil legal obligations such as tax obligations or its obligations as Employer or processes data to do its business, such as Personal data of participants on trainings to execute the agreement that In Tense excluded with for example employers of the participants.

The Personal data that are collected are adequate, relevant and limited to what is necessary in relation to the purposes.

In Tense does not sell any information or Personal data, or offer any direct marketing services. In Tense does not share any information or Personal data with third parties without prior written consent of the natural person involved, unless required by law and/or required by official Authorities such as the police and the Court of Justice or unless necessary for the execution of the agreements as mentioned above.

In Tense does not use technologies to collect, process, follow and store private information of natural persons. When private persons interact with the website, In Tense does not use anonymous identifiers to identify the visitors of the website.

## 6. Data processors

In Tense may use third parties for certain services that need the processing of Personal data, such as

- Accountant/ payroll processors,
- Insurers,
- Pension providers,
- Travel agencies,
- IT providers,

All data processors of In Tense have to comply with the Dutch DPA/ GDPR and additional rules and regulations concerning data protection and will only process Personal data when necessary to execute agreements.

## 7. How long does In Tense stores Personal data?

- All information within In Tense is stored for a definite period of time (as long as necessary) or for a period of seven years after termination of an agreement as required by the Tax laws and regulations.
- Only Personal data necessary for the execution of agreements or to fulfil legal obligations or for which a legitimate interest of In Tense exists is recorded and stored.
- Personal data will be destroyed or deleted if no longer necessary.

## 8. How does In Tense protect Personal data?

In Tense implemented the necessary administrative, technical and organizational measures in order to ensure a level of security that is appropriate for the specifics risks that we have identified. In Tense protects Personal data against destruction, loss, alteration, unauthorized disclosure or access to Personal data transmitted, stored or otherwise processed.

Amongst others the following measures are taken:

- Logical access control: Access to laptops and to files is only allowed for authorized persons (mainly restricted to certain Employees and/or contractors), and controlled and secured against unauthorized access to IT-systems by usernames and passwords;
- Financial/banking data are restricted to people who need to have access to this data to perform their jobs, and in order to access the application source code a user/password authentication is required;
- Software protection: All data stored on servers are protected against viruses by virus scanners and by regular backups;
- In Tense does not use the public cloud to store and backup her information, but uses a private cloud and hired a contractor for security of her IT systems.



## 9. Rights of data subjects and how to exercise rights

A data subject has the following rights:

- Right to information and right to access Personal data: a data subject may request at any time more information on the processing activities and the Personal data that In Tense is keeping from this person.
- Right to rectification and right to access Personal data: a data subject has the right to obtain from In Tense without undue delay the rectification or completion of any inaccurate or incomplete Personal data.
- Right to deletion of Personal data (right to be forgotten): Deletion of Personal data is allowed to request when processing is no longer necessary for achieving the purposes for which they were collected or otherwise processed; or when processing was based on the data subject's consent and the data subject decided to withdraw this consent; or when there are reasonable grounds to object to processing of the Personal data; or when Personal data have been unlawfully processed; or when Personal data have to be erased in compliance with a legal obligation. In Tense refused to delete Personal data by way of an exception for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.
- Right to restriction of processing: a data subject can ask In Tense to restrict the processing of the Personal data in the following situations: when the accuracy of the Personal data is contested for a period enabling In Tense to verify this accuracy, when the processing appears to be unlawful and the data subject requests In Tense restriction of use in stead of deletion, pending verification whether the legitimate interests of In Tense override the interests of the data subject in the framework of an objection.
- Right to object the processing of Personal data: When processing is based on legitimate interest, the data subject has the right to object to the processing of Personal data. In Tense will in that case no longer process the Personal data unless In Tense has compelling legitimate grounds to do so or because such a processing is necessary in the establishment, exercise or defence of a legal claim or for tax reasons.
- Right to data portability: a data subject has the right to receive all personal data in case the processing is carried out by automated means or in case the processing is based on consent or on the necessity for the performance of a contract.

## 10. Cookies

Cookies are small pieces of data that are temporarily stored on a computer or mobile device via the browser of the visitor of a website. In Tense does not use cookies.

## 11. Data leakage

In Tense has a data leakage protocol that will be followed in case any security incident is detected in the IT system and/or a data leakage is suspected.

## 12. Changes

In Tense reserves the right to amend this policy from time to time. The amendments will apply as of the moment that the amendment is published.

## 13. Complaints/questions/remarks

Complaints, questions or remarks can be send to In Tense: [info AT in-tense.nl](mailto:info@in-tense.nl)

The contact person for data protection within In Tense is:

Mrs Ria van der Ziel

Schrevenweg 6

8024 HA Zwolle

In case a data subject is not satisfied with the complaint handling of In Tense, the data subject has the right to submit its complaint to the Data Protection Authority of the Netherlands.