



We, Keepfactor B.V., have created this Privacy Policy because your privacy is important to us. This Policy explains how we collect and use your personal data and it applies to any personal data we collect about you, whether through our website, through the provision of our Services or otherwise.

It is important to understand that we process personal data in two different roles:

- 1) When we process the personal data of visitors to our website and the people who work for our customers, we are the data controller. This privacy policy is relevant only for these individuals.
- 2) When we provide our Services we may process the personal data of those individuals who are invited to participate in surveys. In those cases, we are the data processor on behalf of our customer. This means that the customer is responsible for complying with applicable data protection laws. This privacy policy does not apply in this case.

We may update this Policy from time to time without notice to you, so please check regularly. This version of the privacy policy was published on November 1<sup>st</sup> 2017.

### 1. What personal data do we collect?

When you sign up as a customer, we collect and process the following information:

- **Contact details.** Such as your name, business address, e-mail address and phone number.
- **Professional information.** Such as your position and your company name.
- **Account data.** Such as your username and password.

When you use our website or software, we may collect and process the following information:

- **Communication data.** Your computer sends certain information to us when you access our website (such as your IP address and what browser you use).
- **Usage data.** We record statistics about your use of our website and software.

When you get in touch with us or sign up for our newsletter:

- **Contact details.** Such as your name, business address, e-mail address and phone number.

### 2. For what purposes do you process my personal data?

The basic reasons for which we collect your personal data are:

- **To provide our services and do invoicing.** We process your personal data to be able to provide our services, respond to customer service requests and send you invoices. We may also process personal data to resolve disputes.
- **To improve our services.** We are constantly trying to improve our services, our software and our website. For this reason we analyze how you use those platforms and try to make it easier to use and introduce new features.
- **To communicate with you and keep you informed about our work.** We process personal data to be able to communicate with you about our services and send you our newsletter (if you sign up).
- **To keep our records complete and accurate.** We make efforts to ensure that any of your personal data that we process is correct and complete.
- **To comply with the law.** We may have to process your personal data to comply with the law or a judicial order.



#### **4. What legal basis do you use to process my personal data?**

We process your personal data on the ground that the processing is necessary for purposes of legitimate interest pursued by us. Our legitimate interests are keeping you informed about our work, keeping our records complete and accurate and gaining a better understanding of our customers, users and the visitors to our website. We may also process personal data to the extent necessary for the performance of a contract with you or to comply with a legal obligation. Finally, in some cases we may ask for your consent to process your personal data for certain purposes.

#### **5. With whom do we share your personal data?**

We may share your personal data with third parties in the following circumstances:

- We may share your personal data with other third parties acting on our behalf. In such cases, these other third parties may only use your personal data for the purposes for which you have provided them to us and only in accordance with our instructions;
- We may share your personal data with those parties you have indicated should be invited to participate in surveys;
- We may share your personal data if we are required to do so by law or court order, for example with law enforcement agencies or other governmental agencies.

#### **7. How do we keep your personal data secure?**

We store your personal data using Microsoft's Azure service and as such we would like to refer you to Microsoft's Trust Center for details regarding the security measures which are applicable to our services: <https://www.microsoft.com/en-us/TrustCenter/Security/azure-security/>

#### **8. Where do we store and process your personal data?**

Your personal data will be stored using Microsoft's Azure cloud service and using services provided by Confirmit. This means that your data may be stored at different locations at any given time. However, such data will always be located within the European Union.

#### **9. How long do we keep your personal data?**

We retain your personal data for a limited amount of time. We store your data only for as long as necessary for the purposes of the processing. In particular, we will retain your email address for purposes of an invitation to participate in a survey for no more than two years.

#### **10. How do we use cookies on our website?**

We do not use cookies on our website.

#### **11. How can you exercise your rights with regard to your personal data?**

If you have provided us with your personal data, but decide that you no longer want to receive information from us, or if you wish to update us that your contact details have changed, simply let us know by:

- Sending an e-mail to [info@keepfactor.com](mailto:info@keepfactor.com)



- Writing to the following postal address:

Keepfactor B.V.  
Gustav Mahlerplein 2  
1082 MA Amsterdam  
The Netherlands

Through these contact details, you can also request access, rectification, erasure, restriction or portability of your personal data. You also have the right to lodge a complaint with the data protection authority. Note that we may not always be able to delete your personal data immediately if we are required by law to keep it or if it is necessary for the processing of a donation.