



Privacy Statement

Assai Software Services B.V.

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1 PRIVACY STATEMENT

Assai Software Services B.V. and its affiliated companies (hereafter “Assai”) considers it important to protect personal data of its staff and of external stakeholders. As part of this fundamental obligation, Assai is committed to the appropriate protection and use of personal data that has been collected online.

Generally, our intent is to only collect personal data that is provided voluntarily by online visitors. Personal information may be requested to support specific business processes, such as providing commercial information to visitors or finding new hires for positions inside the company. Please review this Privacy Statement (“Privacy Statement”) to learn more about how we collect, use, share and protect the personal data that we have obtained.

1.1 Collection and use of personal data

We only obtain personal data if you choose to provide it — for example, to contact mailboxes or to register for certain services. Your personal data is not used for other purposes than the purposes for which you have provided the information to us, unless we obtain your permission, or unless otherwise required or permitted by law, professional standards or quality rules, or in case required to improve the quality of our services. For example, if you send us an email message requesting information about Assai, we will use your email address and other information you supply to respond to your request. If you send us a resume or curriculum vitae (CV) to apply online for a position with Assai, we will use the information that you provide to match you with available Assai job opportunities. If you choose to register or login to our Assai web site using a third party single sign-on service that authenticates your identity and connects your social media login information (e.g., LinkedIn, Google, or Twitter) with Assai, we will collect the information or content needed for the registration or log-in that you have permitted the social media provider to share with us.

Assai generally collects only the personal information necessary to fulfil your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

Dutch law allows Assai to process personal data, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract:** this is when the processing of your personal data is necessary in order to perform our obligations under a contract;
- **Legal obligation:** this is when we are required to process your personal data in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;

- **Legitimate interests:** we may process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or
- **Your consent:** we may occasionally ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting Assai at info@assai.nl.

Examples of the 'legitimate interests' referred to above are:

- To offer information and/or services to individuals who visit our website or offer information about employment opportunities.
- To prevent fraud or criminal activity and to safeguard our IT systems.
- To customize individual's online experience and improve the performance usability and effectiveness of Assai's online presence.
- To conduct, and to analyze, our marketing activities.
- To meet our corporate and social responsibility obligations.
- To exercise our fundamental rights.

Assai only collects "sensitive" personal information (including personal information regarding a person's race, ethnicity, political beliefs, trade union membership, religious or similar beliefs, physical or mental health, sexual life or criminal record) when the relevant individuals voluntarily provide us with this information and in each case we collect such information when permitted by law.

1.2 Automatic collection of personal information

Assai and its service providers may use cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of Assai's online presence, and to measure the effectiveness of our marketing activities.

1.2.1 IP addresses

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis.

1.3 1.2 Children

Assai understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or



directed at children under the age of 16. It is our policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services.

2 Sharing and transfer of personal data

Transfers within the Assai network

Assai will share information about you with other member firms of the Assai network as part of our engagement where required or desirable to meet our legal and regulatory obligations around the world. Other parts of the Assai network are also used to provide services to us and you, for example hosting and supporting the IT application, assisting with client engagements services in order to continue to run Assai's business.

Transfers to third parties

We do not share personal information with unaffiliated third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. This would include:

- Our service providers: Assai works with reputable partners, service providers or agencies so they can process your personal information on our behalf. Assai will only transfer personal information to them when they meet our strict standards on the processing of data and security. We only share personal information that allows them to provide their services.
- If we are reorganized or sold to another organization: Assai may also disclose personal information in connection with the sale, assignment, or other transfer of the business of the site to which the data relates;
- Courts, tribunals, law enforcement or regulatory bodies: Assai may disclose personal information in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary or prudent to comply with applicable laws, court or tribunal orders or rules, or government regulations.
- Audits: disclosures of personal information may also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat.
- Insurers: in the event of a claim, we shall share information with our insurer.

In some instances, Assai may share personal data with various outside companies or service providers or vendors working on our behalf to help fulfill your requests. In addition, Assai will transfer certain personal data across geographical borders to other Assai member firms or outside companies working with us or on our behalf for the purposes described in this Privacy Statement. Assai will also typically store personal data in a jurisdiction other than where you are based. Personal data transfer by Assai are in accordance with (privacy) laws and regulations, such as the General Data Protection Regulation (GDPR).



Assai will not transfer the personal information you provide to any third parties for their own direct marketing use.

3 Choices

In general, you are not required to submit any personal data to Assai online, but we may require you to provide certain personal data in order for you to receive additional information about our services and events. Assai may also ask for your permission for certain uses of your personal data, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

4 Your rights

If you have submitted personal information to Assai, you have the following rights:

- **Access, rectification, erasure or restriction on processing:** you have the right to access to that data. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If the information we hold about you is incorrect, you may ask us to correct any inaccuracies. You have the right to object to us processing your personal data if we are not entitled to use it any more, to have your data deleted if we are keeping it too long or have its processing restricted in certain circumstances.
- **Data portability:** in addition, you have the right to obtain copies of data we hold about you in a useable form.

You can make a request or exercise these rights by contacting info@assai.nl and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

5 Data security and integrity

Assai has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite Assai's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information. We also make reasonable efforts to retain personal data only for so long as the data is necessary to comply with an individual's request or until that person asks that the data to be deleted.

6 Links to other sites

Please be aware that Assai websites may contain links to other sites, including sites maintained by other Assai member firms that are not governed by this Privacy Statement but by other privacy statements that may differ somewhat. We encourage users to review the privacy policy of each website visited before disclosing any personal information.

By registering on any Assai web site and then navigating to another Assai web site while still logged in, you agree to the use of your personal data in accordance with the privacy statement of the Assai web site you are visiting.

7 Changes to this statement

Assai may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the “updated” date at the top of this page. Any changes to the processing of personal data as described in this Privacy Statement affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

8 Policy questions and enforcement

Assai is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personally identifiable information, please contact us at info@assai.nl. You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement. We will acknowledge your complaint or request as soon as possible and seek to resolve your concern or request.

In any event, you always have the right to lodge a complaint with the Dutch Data Protection Authority.