

Privacy statement

In this privacy statement of BDO you can read which personal data we collect about you and how we process it. This statement is based upon the privacy statement of BDO Netherlands B.V. and the GDPR, General Data Protection Regulation.

You share certain personal data with BDO for the purpose of providing our services. This data tells us something about you or can be associated with you as a person. The personal data processed by BDO depends on the assignment, whereby we will not ask for more personal data than is necessary for the performance of the service.

BDO complies with the General Data Protection Regulation (GDPR) when processing personal data.

It follows from this that BDO ensures, among other things, that:

- ✦ the processing of personal data is lawful, fair and transparent;
- ✦ we only process data for legitimate purposes and no more or longer than necessary;
- ✦ We ensure the accuracy, integrity and confidentiality of data. We do this by taking appropriate technical and organisational security measures.

Why do we process your personal data and what is the basis for doing so?

Goals and principles

BDO only processes personal data for specifically defined purposes and on the basis of a lawful basis. In the overview below, you can see what BDO's purposes are when processing personal data and on what basis BDO processes that data. This statement only applies to the nis2sure analyzer.

Goal	Basis of the GDPR
The execution of agreements with customers	Article 6(1)(b) GDPR - performance of the agreement and/or BDO's legitimate interest
Carrying out marketing activities	Article 6(1)(a) GDPR – consent of the data subject; or Article 6(1)(f) GDPR - BDO's legitimate interest
The (specific) purpose for which personal data is processed	Article 6(1)(a) GDPR - consent of the data subject

What types of personal data do we process about you?

BDO processes the following types of personal data, but only insofar as the processing is necessary for the purpose in question (see purposes on first page):

identification

- ✦ Name;
- ✦ Address;
- ✦ Company name and job title
- ✦ Telephone number;
- ✦ E-mail address;
- ✦ IP address;
- ✦ Member State.

What rights do you have and how do you claim them?

If you would like information about the personal data that BDO processes about you, we will be happy to provide you with it. We do this after it is sufficiently clear to us who you are (identify) and that you are actually the person you say you are (authenticate). This identification will preferably take place at one of the BDO branches.

In addition to the right to request information, you also have a number of other rights provided for by law in relation to your personal data. Below you can read what rights you have:

- ✦ Right of access to your personal data recorded by BDO;
- ✦ Right to request correction or deletion of your personal data;
- ✦ Right to object (oppose) certain types of use of your personal data;
- ✦ Right to restrict (future) processing of your personal data;
- ✦ Right to ask us to transfer your data to you or another organisation.

BDO will at all times assess and honour your request as permitted by law and regulations. You can submit any questions and/or requests related to the processing of personal data by BDO using the contact details below:

BDO

to the attention of Partner Cyber Security

BDO Netherlands

support.digital@bdo.nl

You will receive a written response to your request within one month.

If you do not agree with a decision made by BDO regarding the processing of your personal data, we are always open to consultation. In addition, you have the right to file a complaint with the Dutch Data Protection Authority if you do not agree with a decision made by BDO regarding the processing of your personal data.

How long do we keep your data?

BDO does not store your personal data any longer than is necessary for the agreed service provision and in line with applicable laws and regulations. In our records and retention policy, we have set specific deadlines for the deletion of data and/or periodic review thereof. In this way, we ensure compliance with the correct retention periods.

Who do we share your data with and why?

Data Sharing

In principle, BDO does not share your personal data with other parties (third parties), unless there is a legal basis for doing so. Here are some examples of circumstances in which we may share your information:

- ✦ It is possible that the police, the judiciary or supervisory authorities request data from us on the basis of the law. A court may also require us to provide or inspect data.
- ✦ It is possible that the Tax and Customs Administration requests data from us on the basis of the law. This applies to specific cross-border arrangements that can be used to avoid tax.
- ✦ It may be necessary to share your data within the BDO network or with carefully selected relations in order to be able to provide our services. Think of the relations who process data on our behalf.

(Sub)processors

To be able to provide our services, we use a number of partners. These partners are also referred to as our (sub)processors or cooperation partners. In the case of the nis2analyzer we are not using these 3rd parties, however it is possible that personal data is stored by one of these partners, or is otherwise processed by them. BDO has made contractual agreements with these partners on how they should handle your personal data. This is how we guarantee the security of your personal data. BDO has partners in the following categories:

- ✦ Designing, maintaining and improving IT systems and applications;
- ✦ Infrastructure as a Service service providers in the field of data centers and data storage and data communication;
- ✦ Marketing activities and events and customer communication management;
- ✦ Preparing reports and statistics, printing publications and designing products;
- ✦ Legal services, audit services and other special services provided by lawyers, notaries, trustees, auditors and other professional advisers;
- ✦ Providing specialized services such as archiving physical documents;
- ✦ Software as a Service service providers in the field of accountancy and financial software such as online bookkeeping services and online payroll.

Transfer of data outside the EU

In principle, BDO stores your data within the borders of the EU. When data is shared outside the EU in the context of the provision of services, BDO guarantees an appropriate level of security and (if necessary) takes appropriate safeguards to protect your personal data. You will always be informed by us if we share your data outside the EU. Examples of measures taken by BDO in the event of transfers outside the EU are:

- ✦ For transfers within the BDO network, both within and outside the EU, we use 'Binding Corporate Rules'. This is an internal code of conduct for data traffic within the BDO network, which has been approved by the competent supervisory authority.
- ✦ For transfers to relations outside the EU, we use 'model contracts', possibly supplemented with additional measures.

Transfers outside the EU may also take place if there is an adequacy decision or if you have given your consent.

How do we protect your personal data?

BDO takes all technical and organisational measures that can reasonably be expected of it to secure your personal data. Of course, these measures are fully in line with the applicable laws and regulations and the current state of the art.

Upon commencement of employment, new employees are made aware of the rules and procedures within the organization, in particular with regard to the applicable security rules and procedures. Regular attention is paid to increasing security and privacy awareness among employees.

Contact or questions about your personal data?

If you would like to know more about BDO's privacy and data processing policy and how we use your personal data, please contact us using the details below:

to the attention of Partner Cyber Security
BDO Netherlands

support.digital@bdo.nl