

Privacy Statement Verachttert

Scope

This Privacy Statement Verachttert governs the collection, use and other forms of processing of personal data by Verachttert Nederland B.V. ("Verachttert") related to our services, our Verachttert products and this website.

Who is responsible for processing your personal data?

Verachttert Nederland B.V. (De Bloemendaal 8, 5221 EC, 's-Hertogenbosch, the Netherlands) is the legal entity responsible for all collection and all processing of your personal data in connection with the products, services and websites of Verachttert.

Verachttert Nederland B.V. is part of Pon Holdings B.V. its affiliates and its subsidiaries ("Pon"). Verachttert Nederland B.V. and Pon are committed to respecting and safeguarding your privacy and the security of your personal data you share with us.

Why do we process your personal data?

Personal data is information that identifies you as an individual or relates to an identifiable individual. When you choose to register your personal data, contact us, or visit our websites, we will process some personal data about you. We process these personal data for the following purposes:

1. communicate with you in a personal way or to inform you about Verachttert products or services, consistent with your choices;
2. provide customer service, including service around the purchase of services and products, fulfil warranty obligations and product recalls for our own services and those of related companies, and to deal with any enquiries or complaints;
3. administer and fulfil your purchases of Verachttert products including the financial and logistic handling;
4. administer your Verachttert account;
5. administer your participation in any contests, promotions, surveys or website features;
6. perform market research and improve our business, services and Verachttert products or to develop new business, services and products;
7. perform statistical analyses and reporting;
8. providing services on the internet;
9. communicating with participants and offering a loyalty program;
10. provide app functionality, including providing relevant commercial messages;
11. to communicate future promotional and marketing information including direct marketing purposes and retargeting;
12. to aggregate and/or anonymize personal data in order to generate other data for our use;
13. to comply with our legal obligations, resolve disputes, or enforce our agreements;
14. as otherwise stated at or about the time information is collected.

Which personal data we process?

Which personal data we exactly process, depends on which websites, products or services you use. We process the following personal data.

Personal data you provide to us:

- This is the personal data that you enter when you use our websites, products or services. This data includes e.g. your name, address, gender, email address, phone number, age, birth date, Verachttert products you bought, the account name and password that you create, bank details for buying Verachttert products etc.

Data collected via sensors:

- Some of our products are equipped with one or more sensors or use the sensors of the devices on which the products are provided. Examples of sensors are GPS receivers, Wi-Fi or Bluetooth receivers, a camera and touch screens.
- In accordance with the purposes for processing the via the sensors collected data about you and the used devices will be sent to Verachttert and other third parties that need the data for providing the agreed services to Verachttert.

Metadata:

- This is data that is collected or generated automatically when you use the websites, products or services of Verachttert. Metadata is often collected or generated when using a computer or device when you send data via a computer network, such as the Internet. This data contains data that may be used by the user interface or device activities, as well as IP addresses, unique device identifiers, MAC addresses of Wi-Fi and Bluetooth devices, cookies and data from computer activities itself.

How do we process your personal data?

In the table below we describe per way of processing: the personal data and the purposes for which we process the personal data as well as the legal basis for the processing:

Ways of processing	Personal data processed	Purposes for processing the personal data	Legal basis
Registration for our newsletter	- First name and last name, e-mail address.	The above described purposes: 1, 2, 6, 7, 8, 11, 12, 13 and 14	Consent or legitimate interest
Contact form customer service	- First name and last name, phone number and email address.	The above described purposes: 1, 2, 6, 7, 8, 11, 12, 13 and 14	Performance of a contract or legitimate interest
Verachttert account creation	- First name and last name, address, phone number and email address.	The above described purposes: 1, 2, 4, 6, 7,8, 9, 11, 12, 13 and 14	Consent, legitimate interest or performance of a contract
Product Verachttert registration	- First name and last name, address, phone number and email address.	The above described purposes: 1, 2, 3, 6, 7, 8, 9, 11, 12, 13 and 14	Performance of a contract or legitimate interest
Buying Verachttert products on the website	- First name and last name, address, phone number and email address.	The above described purposes: 1, 2, 3, 6, 7, 8, 9, 11, 12, 13 and 14	Performance of a contract or legitimate interest
Attend to product promotion, events or online forum	- First name and last name, address, phone number and e-mail address.	The above described purposes: 1, 5, 6, 8, 11, 12, 13 and 14	Consent or legitimate interest
Visit our websites (cookies)	- Metadata NB: please refer to our Cookie Policy Verachttert for further details	The above described purposes: 6, 7, 8, 11, 12, 13 and 14	Consent or legitimate interest

Our legitimate interests include: marketing, advertising, security, (crime) prevention, IT management, research and analysis of our products or services, business management, legal affairs, internal management.

You have the right to withdraw your consent which you may have given to the processing of your personal data at any time by sending your withdrawal request to privacy@pon.com.

How do we share or transfer your personal data?

You should be aware that Verachtert is part of a business group within Pon and that departments (like IT, Marketing) can be located in Pon companies around the world. As a consequence your personal data may be shared within and/or transferred to other business group companies or other Pon companies around the world. You can consult the list and location of our companies here: <http://www.pon.com/en/our-business/bedrijven>.

Verachtert may share your personal data with the manufacturer(s) of your Verachtert product to provide customer service, including product service, fulfil warranty obligations, register your Verachtert product, perform statistical analyses and market research and improve our business, services and Verachtert products.

Verachtert may share your personal data also with third parties to perform certain processing activities on behalf of Verachtert and to facilitate services they provide to us. These can include providers of services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services. Verachtert may also share your personal data to third parties, to permit them to send you marketing communications, consistent with your choices. Verachtert requires these third parties to process and protect your personal data diligently. Verachtert will not sell your personal data to third parties.

Verachtert or Pon might reorganize, merge or in any other way sell or dispose (part of) a business company to another company. Where such business relates to Verachtert, such transfer of ownership may include the transfer of your personal data to the new owner and its advisors. We will otherwise only disclose your personal data if so required or authorized by law, where necessary for preventing or combating fraud, where necessary for dispute resolution, or for any other pressing legitimate need which under the circumstances must outweigh your privacy interests, such as the security of our business and the safety of our staff.

How do we protect your personal data?

Verachtert will take appropriate technical and organizational security measures against loss or unlawful processing of personal data. This may include using secure registration forms, encryption of data, and restricting access to your personal data.

Please note that some third countries do not provide for an adequate level of protection for your personal data. However, you can be assured that Verachtert will take appropriate safeguards for the confidentiality and protection of your data. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, standard contractual clauses adopted by the European Commission, to protect your personal data. You may obtain a copy of these measures by contacting privacy@pon.com.

How long do we retain your personal data?

We retain personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our services to you (for example, for as long as you have an account with us or keep using our services);

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Cookies, web beacons and similar techniques

If you are using our websites, services, applications, communications (including email) and accessing or using tools, we may use cookies, web beacons and other similar technologies for storing information to provide you with a better, faster and safer browser experience.

Please refer to our **Cookie Policy Verachtert** for the explanation of cookies, web beacons and similar techniques, how we use these techniques and how you can control these techniques.

Your rights

If you would like to request to review, correct, update, suppress, restrict or delete personal data, object to the processing of personal data, or if you would like to request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us via privacy@pon.com. We will respond to your request consistent with applicable law.

In your request, please make as clear as possible what personal data your request relates to. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event within any applicable legally required timeframes.

Contact, questions, feedback and Data Protection Officer

If you have any questions about this Privacy Statement, please contact us at privacy@pon.com.

You may also contact our Data Protection Officer (DPO) via privacy@pon.com. You have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs.

Policy changes

We may change this Privacy Statement from time to time. Any changes will become effective when we post the revised Privacy Statement. If necessary, we will inform you when we change the Privacy Statement. This statement was last modified on date: 22 November 2019.

Responsible disclosure

Have you discovered a vulnerability? Let us know.

At Pon Holdings B.V. and its subsidiaries, we naturally consider the security of our systems and our network to be of the utmost importance. We are convinced that good security is essential to maintain the trust that our clients, suppliers and employees place in us. Despite the care invested in the security of our systems, however, it is still possible that vulnerabilities could be discovered.

By means of our *responsible disclosure* policy, we ask anyone who has discovered a vulnerability to report it as quickly as possible, so that we can take adequate countermeasures. We would be happy to work with you to solve the vulnerability. Our *responsible disclosure* policy is not an invitation to actively scan our company network in detail to discover vulnerabilities, as we are already monitoring the network.

We ask that you:

- Report your discoveries as quickly as possible to rd@pon.com. If you would like to encrypt your report before you send it, please inform us in your e-mail and we will give you instructions;
- Provide us with enough information to reproduce the vulnerability, so that we can solve it as quickly as possible. Usually the IP address or URL for the affected system and a description of the vulnerability are sufficient, but more complex vulnerabilities may require additional information;
- Not to abuse the vulnerability by downloading, viewing, deleting or editing data;
- Not sharing vulnerabilities with others until they can be solved. If you have inadvertently obtained confidential information, then we ask that you delete the data immediately;
- Not to use attacks on the physical security or applications of third parties, social engineering, distributed denial of service (DDoS), spam or hacking tools such as vulnerability scanners.

What can you expect:

- We will always take your report seriously. We will also investigate any suspected vulnerabilities;
- We will reply to your report within 5 working days with our evaluation of the report and an expected date for the solution;
- We will keep you informed of the progress made in solving the vulnerability;
- If you abide by the conditions stipulated above, then we will not take legal action against you pertaining to the report. The Public Prosecutor's Office retains the right to decide whether additional investigation is necessary;
- We will treat your report with confidentiality, and will not share your personal data with third parties without your permission unless required to do so by law, such as when your data are requested by the police or the courts;
- If you submit an anonymous report, we may not be able to contact you with information about the subsequent steps and the progress made in solving the vulnerability;
- We may express our appreciation with a maximum value of € 50. This will be based on the severity of the vulnerability and the quality of the report;
- At your request, we can mention your name as the person who discovered the vulnerability in any communications about the incident;
- We strive to analyse, and if needed solve, any vulnerabilities as quickly as possible after they are discovered. We will also keep all stakeholders informed about the issue.

This *responsible disclosure* policy is based on the Responsible Disclosure Guideline published by the National Cyber Security Centre, and the sample Responsible Disclosure written by [Floor Terra](#).