

## **PRIVACY POLICY – OCEAN GROUP - EN**

*Directly translated from Dutch:*

### **About our privacy policy**

This privacy policy applies to the use of the [www.ocean.nl](http://www.ocean.nl) website and the Ocean Group services provided thereon. The effective date for the validity of these conditions is 15/06/2018, with the publication of a new version the validity of all previous versions expires.

This privacy policy describes what information about you is collected by us, what this information is used for and with whom and under what conditions this information may be shared with third parties. We also explain to you how we store your data and how we protect your data against misuse and what rights you have with regard to the personal data you provide to us.

Ocean Group cares a lot about your privacy. We therefore only process data that we need for (improving) our services and handle the information we have collected about you and your use of our services with care. We never make your data available to third parties for commercial purposes.

If you have any questions about our privacy policy, you can contact our contact person for privacy matters, you will find the contact details at the end of our privacy policy.

### **About the data processing**

Below you can read how we process your data, where we store it (or have it stored), which security techniques we use and for whom the data is transparent.

### **Web site software**

Our website has been developed with Wix software. Personal data that you make available to us for the purpose of our services is shared with this party. Wix has access to your data to offer us (technical) support, they will never use your data for any other purpose. Wix is obliged on the basis of the agreement we have concluded with them to take appropriate security measures. These security measures consist of the application of SSL encryption and a strong password policy. Wix uses cookies to collect technical information regarding your use of the software, no personal data is collected and / or stored. Wix reserves the right to share collected data within its own group to further improve services.

### **Web hosting**

We purchase web hosting and e-mail services from Vimexx. Vimexx processes personal data on our behalf and does not use your data for its own purposes. However, this party can collect metadata about the use of the services. These are not personal data. Vimexx has taken appropriate technical and organizational measures to prevent the loss and

unauthorized use of your personal data. Vimexx is obliged to maintain confidentiality on the basis of the agreement.

### **Email newsletters and mailing lists**

We send our e-mail newsletters with Wix or MailChimp. Wix or MailChimp will never use your name and e-mail address for its own purposes. At the bottom of every e-mail that has been automatically sent through our website you will see the "unsubscribe" link. You will then no longer receive our newsletter. Your personal data is stored securely by Wix or MailChimp. Wix or MailChimp uses cookies and other internet technologies that provide insight into whether e-mails are opened and read. Wix or MailChimp reserves the right to use your data to further improve the service and, within that context, to share information with third parties.

### **E-mail**

We use the services of Vimexx for our regular business e-mail traffic. This party has taken appropriate technical and organizational measures to prevent abuse, loss and corruption of your and our data as much as possible. Vimexx has no access to our mailbox and we treat all our e-mail traffic confidentially.

### **General purpose of the processing**

We use your data solely for the purpose of our services. This means that the purpose of the processing is always directly related to the assignment that you give. We do not use your data for (targeted) marketing. If you share data with us and we use this data to contact you at a later date - unlike at your request - we will ask you for explicit permission. Your data will not be shared with third parties, other than to meet accounting and other administrative obligations. These third parties are all held to confidentiality on the basis of the agreement between them and us or an oath or legal obligation.

### **Automatically collected data**

Data that is automatically collected by our website is processed with the aim of further improving our services. This data (for example your IP address, web browser and operating system) is not personal data.

### **Retention periods and forgetting request**

We keep your data for as long as you are a client of ours. This means that we keep your data until you indicate that you no longer wish to use our services. If you indicate this to us, we will also regard this as a forget request.

### **Your rights**

On the basis of the applicable Dutch and European legislation, you as a data subject have

certain rights with regard to the personal data processed by or on behalf of us. We explain below what these rights are and how you can invoke these rights.

In principle, in order to prevent abuse, we will only send copies and copies of your data to your e-mail address already known to us. In the event that you wish to receive the data at a different e-mail address or, for example, by post, we will ask you to identify yourself. We keep records of settled requests, in the case of a forget request we administer anonymized data. You receive all copies and copies of data in the machine-readable data format that we use within our systems. You have the right to submit a complaint to the Dutch Data Protection Authority at any time if you suspect that we are using your personal data in the wrong way.

### **Right of inspection**

You always have the right to view the data that we (have) process and that relate to you or that can be traced to it. You can make a request to that effect to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a copy of all data with an overview of the processors who have this data on them, with an indication of the category in which we have stored this data.

### **Rectification right**

You always have the right to have the data that we (have) process and that relate to your person or that can be traced to that, adjusted. You can make a request to that effect to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation at the e-mail address known to us that the information has been changed.

### **Right to limit processing**

You always have the right to limit the data that we process or have processed that relate to you or that can be traced to it. You can make a request to that effect to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation at the e-mail address known to us that the information up to you cancels the restriction is no longer being processed.

### **Right to transferability**

You always have the right to have the data that we (or have it processed) that relate to your person or that can be traced to that data carried out by another party. You can make a request to that effect to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you copies or copies of all data about you that we have processed or that have been processed on our behalf by other processors or third parties at the e-mail address known to us. In all likelihood, in such a case, we can no longer continue to provide services, because the secure linking of data files can then no longer be guaranteed.

### **Right of objection and other rights**

In appropriate cases you have the right to object to the processing of your personal data by or on behalf of Ocean Group. If you object, we will immediately cease data processing pending the handling of your objection. If your objection is justified, we will make copies and / or copies of data that we (have) process available to you and then permanently cease processing. You also have the right not to be subject to automated individual decision-making or profiling. We do not process your data in such a way that this right applies. If you believe that this is the case, please contact our contact person for privacy matters.

### **Google Analytics**

Cookies from the American company Google are placed via our website as part of the "Analytics" service. We use this service to keep track of and get reports on how visitors use the website. This processor may be required to provide access to this data on the basis of applicable laws and regulations. We collect information about your surfing behavior and share this data with Google. Google can interpret this information in conjunction with other data sets and in this way follow your movements on the internet. Google uses this information to offer targeted advertisements (Adwords) and other Google services and products, among other things.

### **Hotjar**

We use Hotjar to better understand the needs of our users and to optimize the service and experience. Hotjar is a technology service that helps us better understand the user experience of our users (for example, how much time they spend on which pages, which links they click on, what users like and dislike, etc.) and this enables us to build a website and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data about the behavior of our users and their devices. This includes the IP address of a device (processed during your session and stored in an unidentified form), screen size of the device, device type (unique device IDs), browser information, geographic location (country only) and the preferred language being used used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell the data collected on our behalf.

### **Cookies statement**

We make use of cookies on this website. A cookie is a simple small file that is sent along with pages from this website and is stored by your browser on your computer's hard drive. We use cookies to facilitate the use of our web store. You can disable these cookies through your browser, but this may adversely affect the functioning of our website. With your permission we place "tracking cookies" on your computer. We use these cookies to keep track of which pages you visit, in order to build a profile of your online behavior. This profile is not linked to your name, address, email address and the like, but only to match advertisements to your profile so that they are as relevant as possible to you. You have the

right to request access to and correction or deletion of your data. See our contact page for this. To prevent abuse, we can ask you to identify yourself adequately. When it comes to access to personal data linked to a cookie, you must send a copy of the cookie in question. You can only delete cookies yourself, as they are stored on your computer.

We use this service to keep track of and get reports on how visitors use the website. Google / Hotjar can provide this information to third parties if Google / Hotjar is legally required to do so, or insofar as third parties process the information on behalf of Google / Hotjar. We have no influence on this. The information that Google / Hotjar collects is made anonymous as much as possible. your IP address is explicitly not given. The information is transferred to and stored by Google / Hotjar on servers in the United States.

### **Changes to the privacy policy**

We reserve the right to change our privacy policy at any time. However, you will always find the most recent version on this page. If the new privacy policy has consequences for the way in which we process already collected data with regard to you, we will inform you of this by e-mail.

### **Contact details**

Ocean Group  
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2595AA The Hague  
The Netherlands  
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Email: info@ocean.nl

Contact person: Deniz Yilmaz