

Confinant Privacy Statement

Confinant is responsible for processing personal data as represented in this privacy statement.

What personal data do we process

Confinant processes its clients' personal data when they use our services and/or when clients provide us with this data themselves.

Below, you will find an overview of the personal data we process, separated into three categories:

1. Clients;
2. Applicants;
3. Salary administration.

For each category a specific set of purposes for processing the personal data will be laid down as well as those individuals who have designated access to it.

1. Clients

1. Processing occurs for the following purposes only:
 - a. identification;
 - b. creating a risk profile in view of the Wwft [Law on Prevention of Money Laundering and Financing of Terrorism];
 - c. client contact;
 - d. performing the activities as agreed with clients;
 - e. executing or applying another law.
2. No data shall be processed with the exception of the following:
 - a. Name, given names, initials, title, sex, date of birth, address, postal code, city of residence, telephone number and similar data necessary for communication purposes as well as the data subject's bank account number;
 - b. an ID copy;
 - c. data that isn't covered by a and b but needs to be processed in view of execution of the law.
3. The personal data is only shared with:
 - a. Those, including third parties, who are charged with or are in charge of activities as intended in the first paragraph or are inevitably involved therein;
 - b. Others, in the case of a legal basis in view of the GDPR.



2. Applicants

1. Processing occurs for the following purposes only:

- a. assessment of the suitability of the data subject for a position that is vacant or may become vacant;
- b. processing of expenses declared by the applicant;
- a. internal monitoring and business security;
- b. execution or application of another law.

2. No data shall be processed with the exception of the following:

- a. name, given names, initials, title, sex, date of birth, address, postal code, city of residence, telephone number and similar data necessary for communication purposes as well as the data subject's bank account number;
- b. an administrative number that contains no information other than as intended under a;
- c. nationality and place of birth;
- d. data, as intended under a, pertaining to the parents, legal guardians or caretakers of minor applicants;
- e. data concerning completed and to-be-completed courses, training and internships;
- f. data concerning the position to which the data subject has applied;
- g. data concerning the nature and content of the current position as well as its termination;
- h. data concerning the nature and content of the previous positions as well as their termination;
- i. data concerning the motivation for the position and organisation;
- j. other data in view of filling the position, provided by or known to the data subject;
- k. data not intended under a through i, but required in view of (the application of) another law.

3. The personal data is only shared with:

- 1. those, including third parties, who are charged with or are in charge of activities as intended in the first paragraph or are inevitably involved therein;
- 2. others, in the case of a legal basis in view of the GDPR.

3. Salary administration

1. Processing occurs for the following purposes only:
 - a. calculating and recording of salaries and compensations to, or on behalf of, the data subject;
 - b. calculating and recording of taxes and premiums on behalf of the data subject;
 - c. filing for benefits in view of employment termination;
 - d. execution or application of another law.
2. No data shall be processed with the exception of the following:
 - a. name, given names, initials, titles, sex, date of birth, address, postal code, city of residence, telephone number and similar data necessary for communication purposes as well as the data subject's bank account number;
 - b. an administrative number that contains no information other than as intended under a;
 - c. nationality and place of birth;
 - d. data, as intended under a, pertaining to the parents, legal guardians or caretakers of minor employees;
 - e. data needed to calculate, record and transfer salaries, compensations and other sums and rewards in kind, to or on behalf of the persons as intended in the first paragraph;
 - f. data needed to calculate, record and pay taxes and premiums on behalf of the data subject;
 - g. data, including data pertaining to family members and former family members of the data subject, necessary in view of a stipulated employment condition;
 - h. data not intended under a through d, but required in view of (the application of) another law.
3. The personal data is only shared with:
 - a. Those, including third parties, who are charged with or are in charge of activities as intended in the first paragraph or are inevitably involved therein;
 - b. others, in the case of a legal basis in view of the GDPR.

What special and/or sensitive personal data do we process

Confinant processes the following special and/or sensitive personal data:

- Race (if we are legally required to keep a copy of an ID on file);
- Burgerservicenummer (BSN) [Citizen Service Number]

This personal data is only used for purposes/services agreed upon with the client.

Any changes to these purposes or services will be brought before the client.

Based on what grounds and for what purpose do we process data

Confinant processes personal data for the following purposes:

- Your consent, such as for submitting our newsletter, so we can send you the newsletter;
- Execution of an agreement, so we can call or email you if the provision of our service demands it;
- Legal obligation, because regulations and legislation, such as by our professional association (NBA), require us to adhere to a sufficient level of file building. We also process personal data when filing our clients' tax returns, for example.

How long do we retain personal data

Confinant keeps personal data no longer than is strictly necessary to achieve the purposes for which data is collected or the legal retention periods that we are bound by. We use the following retention periods for the following (categories) of personal data:

- Cookies on our website are subject to a maximum retention period of 30 days;
- Data pertaining to a potential client (e.g. submitted to our office via the website), is removed after 30 days if the potential client fails to convert. If a potential client does convert, their data is stored for as long as the provision of our service to that client demands it;
- For the recording of personal data in applications and files for the purpose of providing our service to the client, our firm adheres to the statutory retention period. In many cases, this amounts to 7 years.

Sharing personal data with third parties

Confinant does not sell its clients' personal data to third parties and only shares it if execution of the agreement with the client demands it or in order to comply with a statutory requirement.

This includes access authorisation of institutions such as the Dutch tax office (Belastingdienst). We conclude (sub)agreements with organizations that process data for our clients on our behalf, to ensure the same level of security and confidentiality of our clients' personal data. Confinant retains its responsibility for the processing of this data.

In exceptional cases, we may share personal data with external specialists such as a notary, lawyer or pension specialist in view of an assignment agreed upon with the client for this/these external specialist(s). In such cases, we will not share this data with this/these external specialist(s) without the client's permission.

This data will not be used for commercial purposes.

Website

With regards to visiting our website, the following applies with regards to personal data.

What Cookies, or similar technology, we use

Confinant uses functional, analytical and tracking cookies through services such as Google Analytics. A cookie is a small text file that is stored in the browser of a device which is visiting the website for the first time. Confinant uses cookies with strictly technical functionality. They keep the website running properly and allow us to optimise its functionality. In addition, we install cookies that track your surfing behaviour so we can present you with personalised content.

We inform newcomers on our website about these cookies and ask for their permission to install them.

Visitors can instruct their browser not to install any more cookies and delete any previously stored information through the web browser's settings. Click [here](#) to learn more.

The right to review, correct or delete

Data subjects (persons to whom the processed data pertains) have a right to review their personal data and submit a correction or deletion request. Furthermore, data subjects have a right to retract their data processing consent or object to Confinant's processing of their data. In addition, data subjects have a right to data portability, which means they can file a request for us to submit a computer file containing whatever personal data of their we process, to the data subject or another organisation as indicated by the data subject.

Data subjects can submit any review, correction, deletion or data submission requests pertaining to their own personal data or requests to withdraw their consent or objections to our processing of their personal data to avg@confinant.nl.

To ensure that the review request was filed by the actual data subject, we ask that you include a copy of a valid ID with your request. Be sure to blur the photo, MRZ if applicable (machine readable zone, the strip of numbers at the bottom of the passport), document number and BSN (Citizen Service Number) to protect your privacy. We will respond as quickly as possible and no later than one month after the request.

Confinant would also like to point data subjects to the fact that they have a right to submit a complaint with the national supervisor, 'Autoriteit Persoonsgegevens' [Personal Data Authority], using the link below.

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

How do we secure personal data

Confinant take the protection of personal data very seriously and takes appropriate (technical) (security) measures to combat abuse, loss, unauthorised access, unapproved publication and unauthorised editing. If data subjects believe that their data is not being properly secured or if there is reason to suspect abuse, please get in touch with the quality manager. The contact details can be found at the top of this privacy statement.

Contact details

The quality manager is our internal supervisor and point of contact for anything related to personal data processing. The quality manager's contact details can be found below.

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