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## SBJ Privacy Notice

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De Schakel 17  
5651 GH Eindhoven  
The Netherlands  
+31 (0)40 290 51 00  
[info@servicebureau.nl](mailto:info@servicebureau.nl)  
[www.servicebureau.nl](http://www.servicebureau.nl)



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## List of changes

Version	Date	Description	Author
1.3	11-11-2021	SBJ Privacy Notice	Mr. Bart Jansen

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## **1 General**

### **1.1 What is the purpose of this document?**

Service Bureau Jansen BV (SBJ) is committed to protect the privacy and security of personal data and information from our customers and their relations and their customers. This privacy notice describes how SBJ collects, processes and uses the personal data and information, during and after the working relationship with SBJ, in accordance with the General Data Protection Regulation (GDPR). It applies to all employees, contractors, suppliers and individuals at SBJ, SBJ clients or potential clients of SBJ and to whom it may concern.

SBJ is a "data processor". This means that SBJ is responsible for how SBJ enriches, modifies, processes and uses personal data and information. SBJ is required under data protection legislation to notify our relations of the information contained in this privacy notice. This notice applies to current and former employees, workers, (sub)contractors and individuals at SBJ and at clients or potential clients of SBJ in respect of whom SBJ holds personal data. This notice does not form part of any contract of employment, a contract to provide services or any other contract. We may update this notice at any time. It is important to read this notice, together with any other privacy notice SBJ may provide on specific occasions when SBJ is collecting or processing personal data or information, so that our relations are aware of how and why SBJ is using such information.

### **1.2 Data protection principles**

SBJ will comply with data protection law. This says that the personal data or information SBJ holds must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that SBJ have clearly explained and not is used in any way that is incompatible with those purposes.
- Relevant to the purposes SBJ agreed upon and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes SBJ has agreed.
- Kept securely and protected.



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### 1.3 The kind of information SBJ may collect, process and use:

Personal data, or personal information, means any information about an individual from which that person can be identified and all information SBJ needs for assigned projects and its activities.

It does not include data where the identity has been removed (anonymous data).

Depending on the circumstances, SBJ may capture, collect, process, store, and use the following categories of personal data or information:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses
- Date of birth
- Gender
- Bank account details
- Photographs, scans, uploads we may also collect and store to identify, validate proof of purchase, serialnumber of a product.
- Purchase information, such as store, date.
- Review information
- Opt in
- possibility to send a newsletter and extra product information
- ....

### 1.4 How may your personal information be collected?

SBJ may collect personal information about customers, consumers and individuals from clients or potential clients in a number of different ways. This includes through an application either directly from consumers (data capturing) or sometimes via another client- or business application. SBJ may sometimes collect information from third parties such as shippers, call centers, back offices. Individuals, consumer at/via our clients may provide SBJ with their contact details as part our services and performances.



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SBJ may also collect personal data or information which is publicly available on websites such as Facebook, LinkedIn, Instagram or similar related websites and social media. SBJ may use third-party applications which source their data from publicly-available websites.

SBJ may collect additional personal information in the course of service-related activities throughout the service processes SBJ provides to their customers.

### **1.5 How SBJ may use data and information**

SBJ will only use personal information when the law allows us to. Most commonly, SBJ may use personal data and information in the following circumstances:

SBJ uses authorised received or captured personal data or information to perform our best agreed services for our customer and their customers. (see 1.3)

### **1.6 Situations in which SBJ may use the personal data or information**

The situations in which SBJ may process the personal data or information are listed below.

This list below indicates the categories, sort of data which may be involved depending on the circumstances, services and activities.

- Paying a cash back or refund to a customer
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements (e.g. KPI)
- To contact customers about requirements and updates, changes, track and trace.
- Gathering evidence for possible complaint handling, -solving
- To prevent fraud.
- To contact you with information about our services.
- To monitor the compliance with our IT policies.



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- To conduct data analytics studies to review and better understand customer retention.
- To produce output based on agreed customer activities (following) the GDPR ruling.
- To ship orders or various output via subcontractors, suppliers
- For fulfilment activities

## 2 Change of purpose

### 2.1 Use for agreed services

SBJ will only use personal data and information for the purposes for which SBJ collects it and the agreed services, unless SBJ reasonably considers that we need to use it for another reason and that reason is compatible with the original purpose. If SBJ needs to use the personal data and information for an unrelated purpose, SBJ will notify as necessary and SBJ will explain the legal basis which allows us to do so.

SBJ may process the personal data and information without your knowledge or consent where this is required or permitted by law.

### 2.2 How SBJ may use special categories personal information

"Special categories" of sensitive personal data and information requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal data and information in the following circumstances:

- Where we need to carry out our legal obligations or exercise specific rights related in line with our data protection policy
- Where it is needed in the public security and in line with our data protection policy.
- In limited circumstances, with explicit written consent.
- Less commonly, SBJ may process this type of information where it is needed in relation to legal claims or where it is needed to protect individuals interests (or someone else's interests) and individuals are not capable of giving your consent, or where already the data or information has been made public.



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### 2.3 Do SBJ need your consent?

SBJ do not need your consent if we use special categories of personal data or information in accordance with our written policy to carry out our legal obligations or exercise specific rights within the fields of the law. In limited circumstances, SBJ may approach individuals for written consent to allow us to process certain particularly sensitive data.

## 3 Automated decision-making

3.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. SBJ is allowed to use automated decision-making in any of the following circumstances:

- Where it is necessary to perform and service the customer contract/agreement and appropriate measures are in place to safeguard the rights.
- Where SBJ has notified the customer or individual of the decision and given a period to request a reconsideration.
- In limited circumstances, with explicit written consent and where appropriate measures are in place to safeguard the legal rights.

If SBJ makes an automated decision on the basis of any special category data, SBJ must have either explicit written consent or it must be justified in the public interest, and SBJ must also put in place appropriate measures to safeguard legal rights.

3.2 Personal data or information will not be subject to decisions which have a significant impact based solely on automated decision-making, unless SBJ has a lawful basis for doing so and we have notified the individual.

## 4 Data sharing

4.1 SBJ may have to share data or information with third parties, including third-party service providers.

SBJ requires third parties to respect the security of the data or the information and to treat it in accordance with the law. We may transfer the data or information outside the EU. If we do, expect a similar degree of protection in respect of the personal data and information.





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4.2 Why might SBJ share the personal data and information with third parties? SBJ may share the personal data and information with third parties where required by law, where it is necessary to perform in the working relationship or where we have another legitimate interest in doing so.

4.3 Which third-party service providers process my personal data and information?

"Third parties" includes third-party service providers and subcontractors. How secure is the data and information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect the personal data and information in line with our policies. SBJ does not allow our third-party service providers to use the personal data and information for their own purposes. SBJ only permits them to process the personal data and information for specified purposes and in accordance with our instructions.

## **5 Data security**

5.1 SBJ has put in place measures to protect the security of the data and information, for example to backup and protect the integrity of our electronic communications and data storage systems. These measures are available in document "Security Measurements SBJ 2018" on our website and further details upon request. Third parties may only process personal data and information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

5.2 SBJ has put in place appropriate security measures to prevent the personal data and information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to the personal data and information to employees, contractors and other third parties who have a business need to know. They may only process the personal data and information on our instructions and they are subject to a duty of confidentiality.

## **6 Suspected Data**

SBJ has put in place procedures to deal with any suspected data and security breach and will notify our contacts and any applicable regulator of a suspected breach where we are legally required to do so.



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## 7 Data retention

How long will SBJ uses my information?

SBJ will only retain your personal data and information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements (in accordance with the GDPR regulation). To determine the appropriate retention period for personal data, SBJ considers the amount, nature, and sensitivity of the personal data and information, the potential risk of harm from unauthorised use or disclosure of personal data and information, the purposes for which SBJ processes personal data and information and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances SBJ may anonymise the personal data and information so that it can no longer be associated. Once the agreed process, service, project is finalized the data and information will be securely destroyed in accordance with applicable laws and regulations.

## 8 Data Protection Officer

SBJ have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If there are any questions about this privacy notice or how SBJ handles your personal information, please contact the DPO of SBJ.

There is the right to make a complaint at any time to the Dutch Data Protection Authority (Dutch DPA), Postbus 93374, 2509 AJ Den Haag, The Netherlands, the NL supervisory authority for data protection issues.

## 9 Job Applications

As part of any recruitment process, SBJ collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

We receive your personal data through your application. This includes name, address, date of birth and telephone number, CV and motivation letter. Furthermore, by submitting your application, you give us permission to conduct an online screening as part of the application procedure (including LinkedIn, etc.).

Service Bureau Jansen stores your personal data in a secure database for a period of 4 weeks, with permission for 12 months. We do not pass on your information to third parties for commercial purposes. Only third parties who help us find new colleagues sometimes need access to (parts of) your data. We ensure that these third parties handle your information with care and comply with all rules.



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## 10 Changes to this privacy notice

SBJ reserves the right to update this privacy notice at any time, and SBJ will provide a new privacy notice when SBJ makes any substantial updates. SBJ may also notify in other ways from time to time about the processing of the personal data or information. If there are any questions about this data protection / privacy notice, please