



Privacy Statement
Spotter BV

May 2018



Privacy policy principles

Spotter BV, hereinafter referred to as "Spotter", "we" or "us", attaches great importance to data protection and you must be able to rely on this. Your privacy is our top priority.

By visiting our Website you provide explicit approval (by means of communication of your personal data or opt-in for the newsletter) of the Privacy Statement and therefore to the manner in which we collect, use and process your personal data. General visitor data is recorded on our website, including the IP address of your computer, the time of retrieval and data sent by your browser. This data is used for visitor analyses and click behaviour on the website. We use this information to improve the functioning of the website. Data is anonymised as far as possible and it is not disclosed to third parties. We use Google Analytics to keep track of how users use the website and how effective Adwords ads are from Google search result pages.

The information obtained, including the address of your computer (IP address), is transmitted to and stored by Google on its servers. Read Google's privacy policy for more information.

Google uses this information to keep track of how our website is used, to provide reports about the website to us and to provide its advertisers with information about the effectiveness of their campaigns. Google may also transfer this information to third parties if Google is legally required to do so, or if third parties process the information on Google's behalf. We have no influence over this. We have not given Google permission to use Analytics information obtained through us for other Google services.

Types of personal data

Spotter can collect and process the following personal data:

- Name
- First name
- E-mail address
- Country
- Home address
- Sex
- Social media data
- Company Name
- Company address
- Invoice address
- Geographical location data
- IP address



This personal data is collected at or in the context of:

- Visits to the Website
- Collaboration with Spotter
- Creation of an account or demo account
- Request for a quote, information or demonstration
- Subscribing to the newsletter
- Spotter services that you use
- Verification of your identity by our customer service department

Personal data collected by Spotter is therefore provided by you on a voluntarily basis. It is necessary to provide certain personal data to use our services. You must keep the details of your employees' user accounts up-to-date within the track-and-trace application. When creating user accounts for yourself and your employees, you provide your permission to use the personal data of the aforementioned persons for the purposes as described below.

Spotter may use your personal data for the following purposes:

- Implementation of an agreement with Spotter
- To answer questions
- To optimise the quality, management and content of the Website
- To send newsletters
- Statistical purposes
- To create an account or demo account
- To provide good customer service and aftersales
- To conduct customer satisfaction questionnaires, surveys and other market research
- To send invoices and collect payments

Processing takes place based on the following legal grounds, based on the specific case:

- You have provided permission for the processing of your personal data for one or more specific purposes
- Processing is necessary for the execution of the agreement with Spotter
- Processing is necessary to comply with a statutory obligation that rests on Spotter



- Processing is necessary for the fulfilment of a task that is of general interest

Disclosure of personal data

Spotter will not disclose your personal data to third parties, unless this is necessary for the execution of the agreement. In this context, your personal data may be made public to payment providers, software suppliers, cloud partners, transport partners, data centres, service providers or financial institutions. If it is necessary for Spotter to disclose your personal information to third parties in this context, the third party in question will be obliged to use your personal data in accordance with the provisions of this Privacy Statement. Spotter concludes data processing agreements with all these parties in which the third party guarantees the privacy of the data. Spotter may also be required to disclose personal data to the competent authorities if we are obligated to do so by law or in connection with current or future judicial legal proceedings and in order to safeguard or defend our rights.

In all other cases, we will not sell, rent or transfer your personal data to third parties unless you provide your consent and a data processing agreement has been concluded with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy-compliant handling of your personal data.

Storage of personal data

Unless a longer retention period is required or justified by law or through compliance with another legal obligation, we only retain your personal data for the period necessary to achieve and fulfil the purposes described in this Privacy Statement.

You have the following privacy rights in the context of processing of your personal data:

- Right to inspect your personal data;
- Right to correct, complete or update your personal data;
- Right to remove your personal data. (In this context, we would like to draw your attention to the fact that certain services will no longer be accessible or cannot be provided if you delete certain personal data that is required or if you have this data removed);
- Right to a restriction on the processing of your personal data;
- Right to transfer your personal data;
- Right of objection/opposition to the processing of your personal data.

If you wish to exercise your privacy rights, please contact us.

We undertake to take appropriate and reasonable physical, technological and organisational security measures to prevent unauthorised or unlawful access to your personal data, as well as the loss,



misuse or alteration of your personal data. Spotter will store all personal data it has collected in the cloud at certified data centres within the EU.