



**Policy principles regarding privacy  
Spotter BV**



## Privacy policy principles

The management of Spotter BV conducts a policy that is aimed at meeting the requirements of our customers, based on standards and relevant laws and regulations. Partly through this policy statement, the management of Spotter BV wishes to announce that the company's policy focuses on the following principles:

- Privacy is an important business risk for us. Management has established the policy, assessed the risks, established measures and periodically assesses the implementation of the policy, both internally and externally, and compliance with these measures.
- Spotter conforms to applicable legislation regarding privacy.
- Spotter regards cybercrime as an undesirable social problem and considers it as a part of its duties to take appropriate measures to limit damage resulting from cybercrime as far as possible.
- Spotter trusts its employees, suppliers and other stakeholders on the basis of the principle of reciprocity and assumes that they comply with agreements regarding privacy and the confidentiality of information provision.
- The HRM policy is partly aimed at improving the privacy and integrity, confidentiality and continuity of information provision.
- The purchase, installation and maintenance of information and communication systems, as well as the integration of new technology, must be implemented with additional measures, if necessary, so that internal standards are not compromised. Impact analyses must be carried out to this end.
- Assignments to third parties for carrying out work are linked to measures to ensure that privacy violation is avoided as far as possible.
- Processors of personal data are ISO 27001 certified, if management deems this necessary.
- When processing and using data, measures are taken to ensure the privacy of customers and staff.
- Data is provided externally only on a 'need-to-know' basis. Internally this is not desirable because knowledge sharing is essential to provide cost-effective service to our customers.
- Confidential information from customers is stored exclusively on secure production environments or project environments, which are adequately monitored.
- Input from customers that contain confidential data is destroyed shortly after processing.



Management supervises implementation of the policy and continuously keeps employees updated on this policy and ensuing agreements. This policy has been further elaborated in procedures, which are included in the management system.

Bergschenhoek 10 May 2018

Spotter BV

Dr H Wagner MBA MFP

Director