

Ncardia Services BV, further to be named: Ncardia, based in Leiden and registered with the Chamber of Commerce under number 77260163, and having its offices at Galileiweg 8, 2333 BD Leiden. Ncardia attaches importance to the protection of personal data. This privacy statement explains how Ncardia handles information about an identified or identifiable natural person, as referred to in the General Data Protection Regulation (GDPR). If you have the impression that your data is not properly protected or there are indications of abuse, please contact us via [info@ncardia.com](mailto:info@ncardia.com)

## Definitions

Personal data is data that enables direct or indirect identification of individuals. An example of direct identification is a person's name. Indirect identification means that a person can still be identified without having this person's name but is identified by- or in combination with other information, for example an IP address.

Processing of personal data includes activities relating to personal data, for example collection, destroying, saving or viewing data.

## Application

This privacy statement applies to the following categories of natural persons for whom Ncardia might process personal data:

- a) (potential) customers (e.g. personal data of contacts and representatives of customers or data about business customers that can be traced back to a natural person (e.g. VAT number or KvK number of a sole proprietorship);
- b) (potential) suppliers (e.g. personal data of contacts and representatives of suppliers or data about suppliers that can be traced back to a natural person (e.g. VAT number or KvK number of a sole proprietorship);
- c) visitors to the Ncardia office building;
- d) visitors to Ncardia's website <https://ncardia.com/>;
- e) recipients of newsletters from Ncardia;
- f) participants of meetings organised by Ncardia;
- g) job applicants;
- h) all other persons who contact Ncardia or for whom Ncardia processes personal data, with the exception of its shareholders, employees and trainees.

## Processing of personal data

Ncardia processes personal data that:

- a) have been provided personally by a data subject (during a discussion or meeting), by telephone, or digitally (via e-mail or web-forms), such as contact details and other personal data;
- b) during a visit by a data subject to Ncardia's website or while reading digital newsletters, such as the IP address, the browsing behaviour on our website (such as information about the first visit, previous visit and current visit, the pages viewed and the way in which the website navigates) or the person concerned opens a newsletter or commercial e-mail of which we collect what subjects are clicked and/or opened;
- c) Ncardia has extracted from other sources, such as business social media platforms (e.g. LinkedIn), the register of the Chamber of Commerce and public business websites.

Ncardia's website contains hyperlinks to websites of other parties and social media buttons of LinkedIn, Twitter and Facebook. If these buttons are clicked, the third-party website or social media platform processes personal data. Ncardia is not responsible for the content of those

websites or the services of these social media platforms. Nor is Ncardia responsible for the privacy policies and the use of cookies of these websites and social media platforms. We refer to the respective privacy statements of these social media platforms in case of questions on personal data processing by these platforms.

### **Processing purposes**

Ncardia processes personal data for the following purposes:

- a) Ncardia processes personal data in order to be able to perform its services. For example, personal data is processed in order to be able to process orders to suppliers, to process orders from customers and to be able to ship ordered products to customers or to contact customers or suppliers. Ncardia processes the following personal data: name, address, telephone number, contact names;
- b) Ncardia processes personal data in order to be able to send invoices to customers and to be able to pay invoices from suppliers. Ncardia processes the following personal data: name, address, bank details, email addresses, telephone numbers, contact names, permissions;
- c) Ncardia processes personal data for (direct) marketing purposes. Ncardia can contact customers or interested individuals to highlight new products or to submit newsletters or to evaluate a meeting (such as a workshop or seminar). Ncardia may process personal data of persons who have given their consent or to promote the legitimate interest of Ncardia. The consent granted can be revoked at any time and at any time, you may object to the processing of your personal data for direct marketing purposes. The withdrawal or exercise of your right of objection does not affect the legality of processing before the time of withdrawal or exercise of the right of objection. Ncardia processes the following personal data: e-mailing addresses, mailing preferences;
- d) Ncardia processes personal data for the development and optimization of its service and product offering. Personal data are also processed for market research. Ncardia processes the following personal data: e-mail addresses.
- e) Ncardia processes personal data for the development and optimization of its website <https://ncardia.com/>. Ncardia's website uses cookies in order to track user statistics. User statistics provide information about the number and the duration of website visits, which parts of the website are viewed and the website click behaviour. These are generic reports, which cannot be traced back to individual visitors.;
- f) Ncardia processes personal data to comply with a legal obligation, including the Anti-Money Laundering and Terrorist Financing Act (Wwft) as well as to combat default by creditworthiness checks. For this purpose, Ncardia processes the following personal data: name, address, bank details, email addresses, telephone numbers, contact names, permissions, payment obligations, financial and legal documents;

### **Legal basis**

Ncardia processes personal data on the basis of the following legal grounds:

- a) consent by the data subject, which may always be withdrawn, without prejudice to the legality of processing on the basis of the consent before withdrawal;
- b) execution of or for the purpose of closing an agreement to provide or receive services or products;
- c) a legal obligation, as under the Anti-Money Laundering and Terrorist Financing Act (Wwft);
- d) a legitimate interest, such as the use of contact details for inviting you to a meeting (such as a workshop or seminar) or sending the Ncardia newsletter.

### **Security**

Ncardia provides appropriate technical and organizational security measures to protect personal data from, among other things, abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes or any other form of unlawful processing of personal data. Ncardia does this by taking physical and organizational measures for access security and shielding any desktop with username and password. Furthermore, implementing the latest software updates and regularly testing security measures is part of our security measures. The Ncardia website uses a reliable SSL Certificate to ensure that your personal data is secured;

### **Data Processors and third parties**

Ncardia can use service providers (data processors) who only process personal data according to the instructions of Ncardia in order to process personal data. Ncardia concludes a processing agreement with data processors governed by the requirements of the General Data Protection Regulation (GDPR). A third-party ICT service provider manages and secures the Ncardia IT environment. Ncardia only provides your personal data to third parties if this is necessary for the execution of an agreement with you, or to comply with a legal obligation. Our employees and the third parties we have engaged are obliged to respect the confidentiality of your data.

### **Data retention**

Ncardia does not keep personal data for longer than necessary for the execution of the purposes mentioned in Ncardia's privacy statement and no longer than is required or permitted under legal (e.g. tax) provisions.

### **Rights, questions and complaints**

A data subject has the right to request Ncardia to view, rectify, delete, transfer, restrict processing and object to the processing of personal data. To prevent abuse, Ncardia may ask you to identify yourself. Further, whether you can exercise a certain right in a given situation is also governed by law, hence we cannot always honour your request. A data subject can contact Ncardia by sending an e-mail message to [info@ncardia.com](mailto:info@ncardia.com)

If you have any complaints about the processing of your personal data, you can send an e-mail to [info@ncardia.com](mailto:info@ncardia.com). Our Privacy Officer is happy to serve you.

If you feel that your rights have been violated, a complaint may also be filed with the Dutch Data Protection Authority (<https://autoriteitpersoonsgegevens.nl/>). On the website of the Dutch Data Protection Authority you can find more information about the protection of personal data.

### **Privacy Statement Changes**

Ncardia can always change this privacy statement. The changes will be published on the Ncardia website. Therefore it is a good idea to check this privacy statement regularly so that you are aware of any changes.

Ncardia's Privacy Statement was last updated on November 25, 2020