# TaxModel, Privacy Policy 2020

TaxModel International (statutory name: TaxModel In-house B.V.), a corporation incorporated under the laws of the Netherlands and having its principal place of business at Stationsplein 12 5211 AP, 's-Hertogenbosch in the Netherlands.

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website.

## **Topics:**

- What data do we collect?
- Special and / or sensitive personal data that we process
- How do we collect your data?
- Data collected by a lead generation platform
- How will we use your data?
- Sharing your personal data with third parties
- How long we store your data?
- Marketing
- Email marketing messages and subscription
- What are your data protection rights?
- What are cookies?
- How to manage your cookies
- Cookie notice
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us

# What data do we collect?

TaxModel International collects the following data:

- Personal identification information
  - o First and last name
  - o Gender
  - o Date of birth
  - $\circ$  Title and function
  - o Address data
  - o Phone number
  - o Company name
  - o Email address
- Online data from web browser
  - o IP address
  - o Browser language
  - o Location data
  - o Information about your activities on our website
  - Internet browser and device type
- Other personal data that you actively provide in an application procedure, in correspondence and by telephone.



# Special and / or sensitive personal data that we process

Our website and / or services do not intend to collect data about website visitors who are younger than 16 years, unless they have permission from parents or guardians. However, we cannot check if a visitor is younger than 16. We encourage parents to be involved in the online activities of their children, in order to prevent data about children being collected without parental consent. If you are convinced that we have collected personal information about a minor without permission, please contact us via <u>privacy@tax-model.com</u> and we will delete this information.

If you are not happy with the way TaxModel has handled your personal data, and are unable to resolve the issue with us personally, you have a right to complain to the Data Protection Commission. (in the Netherlands: <u>Autoriteit Persoonsgevens</u>)

## How do we collect your data?

You directly provide TaxModel International with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.
- Use or view our website after you visit our Social Media pages as LinkedIn or Instagram.
- Gives information over the phone for convenience.

#### How will we use your data?

TaxModel International collects your data so that we can:

- Process your order, manage your account and handling your payment.
- Call or e-mail you if necessary to carry out our services
- Call or e-mail you with special offers on other products and services we think you might like.
- Inform you about changes to our services and products

TaxModel International also processes personal data if we are legally obliged to do so, such as information we need for our fiscal obligations.

#### Sharing personal data with third parties

TaxModel International engages third-party service providers to support the availability and data processing activities of its products and related services. We offer the ability to meet data residency requirements in the EU and the United States. We transfer personal data according to applicable laws. If your use of our products and services requires us to transfer personal data outside the European Economic Area and/or Switzerland, we follow mechanisms laid out in the EU-US Privacy Shield or the Swiss-US Privacy Shield. We are also able to enter into the Standard Contractual Clauses (commonly referred to as EU Model Clauses).

When TaxModel International processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.



## How long we store your data?

TaxModel International does not store your personal data longer than is strictly necessary to achieve the purposes for which your data is collected. We also take into account the statutory mandatory retention periods imposed on us. We use the following retention periods for the following personal data:

#### Personal details

Personalia (first and last name, gender, date of birth, company name, title and function), address data, phone number, email address and the activity feed are kept for 24 months from the last contact.

#### **Online data**

Data obtained through the website visit and Google Analytics, such as IP address, location data, information about your Internet browser and device type, are kept for 14 months after the last contact.

#### Information provided in an application procedure

Data obtained or collected in the context of an application procedure will be retained up to 1 month after the completion of the application procedure. When an employment contract is offered, the information obtained is added to the employee file and saved in accordance with the legal obligations.

Once a time period has expired, your data will be automatically deleted within our Customer Relationship Management system.

#### Marketing

TaxModel International would like to send you information about products, services and articles of ours that we think you might like.

Below is a representative list of our marketing partners, along with a link to the privacy policy each partner sets. The partners we work with may change from time to time.

Partner	Privacy Policy
WordPress	https://wordpress.org/about/privacy/
Hotjar	https://www.hotjar.com/legal/policies/privacy
HubSpot	https://legal.hubspot.com/privacy-policy
Google Suite	https://policies.google.com/privacy?hl=en-US
Typeform	https://admin.typeform.com/to/dwk6gt
BetterProposals	https://betterproposals.io/about/privacy
Cognism	https://www.cognism.com/privacy-policy



If you have agreed to receive marketing mails, you may always opt out at a later date. You have the right at any time to stop TaxModel International from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

## Email marketing messages and subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "how do we collect your data" above. Any email marketing messages we send are done so through Hubspot or Microsoft Mail.

Email marketing messages that we send may contain tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign. Any email marketing messages we send are in accordance with GDPR.

#### We occasionally acquire data from Cognism.

Your email address is a B2B email and consent is not required, an opt-out link is always included in the email and you can click that and opt-out of future correspondence - this is known as a soft-opt in. This is allowed under the current regulations, Cognism has verified this with a legal opinion and Privacy Impact Assessment.

If you would like to be forgotten by the Cognism system please click <u>here</u>. Cognism only collects data from public sources under legitimate interest grounds (allowed under GDPR) or from sources where consent has been granted.

#### What are your data protection rights?

TaxModel International would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request TaxModel International for copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that TaxModel International correct any information you believe is inaccurate. You also have the right to request TaxModel International to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that TaxModel International erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that TaxModel International restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to TaxModel International's processing of your personal data, under certain conditions.



**The right to data portability** – You have the right to request that TaxModel International transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please download and complete our Right to Erasure Request Form. You will find the document <u>here</u>.

## Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

#### How to manage cookies

You can set your browser not to accept cookies and you can also delete all information previously saved via the settings of your browser. However, in a few cases, some of our website features may not function as a result.

#### **Cookie Notice**

Additional information on how we use cookies and other tracking technologies and how you keep control over such is included in our <u>Cookie Notice</u>.

## Privacy policies of other websites

The TaxModel International website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

# Changes to our privacy policy

TaxModel International keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 28 October 2020.

#### How to contact us

TaxModel International takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

If you have any questions about this privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at:	<u>privacy@tax-model.com</u>
Call us:	+ 31 (0)73 800 0030
Or write to us at:	TaxModel In-House B.V.
	Stationsplein 12
	5211 AP, 's-Hertogenbosch
	The Netherlands

