

## Privacy statement Cleversight B.V.

This privacy statement has been drawn up by Cleversight B.V. (Chamber of Commerce number 86958011). Cleversight B.V. is located at the address Achtseweg Zuid 159, 5651 GW Eindhoven, Netherlands

Cleversight can be reached via:

- Our website: [www.cleversight.one](http://www.cleversight.one)
- Our email address: [info@cleversight.com](mailto:info@cleversight.com)
- Our postal address: Achtseweg Zuid 159, 5651 GW Eindhoven
- Our telephone number: +31(0)85-4016802

### Background and contents of this privacy statement

---

Cleversight is aware that appropriate processing of personal data is of great importance. Processing is about everything that can be done with personal data, from saving to destroying. The General Data Protection Regulation (GDPR) lists 'collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction' as examples of processing data. In this privacy statement you can read which personal data Cleversight processes and with which purpose we process data. The way in which Cleversight operates is in accordance with the GDPR.

This privacy statement is structured as follows:

1. Controller
2. Personal data that we process;
3. Special and / or sensitive personal data that we process;
4. Purpose of data processing;
5. How long we store your personal data;
6. How we protect your personal data;
7. Sharing your personal data with third parties;
8. Cookies, or similar techniques, that we use
9. View, modify or delete your personal data
10. Submitting a complaint
11. Updating our privacy statement

### Controller

---

Mr J. Schrijvers (CEO) is the Controller of Cleversight and can be contacted for questions about the way in which data are processed. He can be reached via the contact details above.

### 1. Personal data that we process

---

Cleversight processes your personal data for the services we provide and/or because we obtained your personal data in the context of an investigation or other assignment. Below is an overview of examples of the personal data we process:

- First and last name(s)
- Sex
- Date of birth
- Place of birth
- Nationality
- (Former) address details
- Telephone number (both business and private)
- E-mail address
- Bank account number(s)

- Information on partner and other family members
- Details of companies in which you are involved
- Payment experiences and credit information
- Salary data
- Training data (diplomas, certificates, etc.)
- Work history (including on the basis of curriculum vitae)
- Current job
- Photos and images
- Website(s)

Following data is not processed by Cleversight at this moment. Depending on client cases it is possible Cleversight will do so in the future:

- Information on proof of identity (e.g. document number)
- Cadastral data
- License plate(s)
- IP address
- Video recordings
- Sound recordings
- Social media(posts)

**Please note:** Cleversight does not process all personal data listed above in all cases. The personal data we process, depends on the nature and purpose of the assignment we carry out. Cleversight processes personal data provided to us by you or by our client. In addition, Cleversight also collects personal data from public sources.

## **2. Special and / or sensitive personal data that we process**

---

Cleversight does not process any special and / or sensitive personal data.

## **3. Purpose of data processing**

---

Cleversight processes personal data for the following purposes:

- For the communication of findings to our clients;
- To execute our agreements;
- For sending invoices and making payments;
- Establish and manage the relationship with our customers (e.g. newsletter);
- Expanding our services (e.g. newsletter, marketing);
- If we are legally obliged to do so, such as information we need for our tax return;
- To answer your questions or to handle your complaints via social media, e-mail, by mail or by telephone;
- To process applications.

Cleversight processes personal data solely on the basis of the principles stated in the GDPR.

## **4. How long we store your personal data**

---

Cleversight does not store your personal data longer than is strictly necessary to achieve the purpose(s) for which your data is collected. We use the following retention periods for the following categories of personal data:

- Customer and business relations: up to ten years after execution of the assignment, unless the law prescribes to keep them for a longer period. During this period it may be necessary that we still contact you or perhaps you would like to make use of our services again. Your contact details can also be kept longer if you have indicated that you wish to remain informed;

- Application information: up to a maximum of four weeks from the date on which the data was received, unless the applicant has given permission to keep the data for a longer period of time (in that case, a maximum of one year);
- Contact form or e-mail: if you fill in a contact form on the website, or send us a question by e-mail, we will only use your data to contact you and to handle your question or complaint. This data is not saved unless you become a client of Cleversight.

## **5. How we protect your personal data**

---

Cleversight has taken appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification of your personal data. Data carriers in use at Cleversight, its employees and any third parties involved are protected against unauthorized access. The digital data carriers on which personal data is stored are secured with encryption. Cleversight also uses encrypted data transmission when exchanging data (both sending and receiving) with third parties. If you have the impression that your data is not properly secured or there are indications of abuse, please contact us.

## **6. Sharing your personal data with third parties**

---

Cleversight will not sell your information to third parties and will only provide this information to them if this is necessary for the execution of our agreements or to comply with a legal obligation.

Cleversight has concluded a processor agreement with companies that process your data on our behalf, to ensure the same level of security and confidentiality of your data. Cleversight remains responsible for these processing operations.

## **7. Cookies, or similar techniques, that we use**

---

Cleversight uses technical and functional cookies. And analytical cookies that do not infringe your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly. We can also optimize our website with this. You can opt out of cookies by setting your internet browser so that it does not store cookies anymore. In addition, you can also delete all information previously saved via the settings of your browser.

Cleversight websites can show links to external websites and organizations. Cleversight has no responsibility with regard to the use of your personal data by those organizations. Always read the privacy statement of the website that you visit.

## **8. View, modify or delete your personal data**

---

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by Cleversight. You also have the right to data portability. This means that you can submit a request to us to send the personal information we hold in a digital file to you or another organization. You can request access, correction or deletion; a request for the transfer of your personal data; withdrawal of your consent; or object to data processing by sending an e-mail to [info@Cleversight.com](mailto:info@Cleversight.com)

To ensure that the request for access has been made by you, we ask you to send a copy of your ID with the request. Your photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and social security number can not be visible on this copy. This is to protect your privacy. We will respond to your request as soon as possible, but in any case within four weeks.

## **9. Submitting a complaint**

---

If you believe Cleversight has made a mistake while performing its work, you can file a complaint. The director of Cleversight will deal with your complaint, hear about your complaint and will make a decision about your complaint.

- If you believe that your complaint has not been dealt with satisfactorily after completion of the procedure, you can send a complain to the Dutch national supervisory authority (Autoriteit Persoonsgegevens) within 6 weeks of receiving the decision of the director of Cleversight. You can do so [here](#).

## **10. Updating our privacy statement**

---

Cleversight reserves the right to change this privacy statement at any time. Changes will be published on our website. We recommend that you regularly visit our website for the most recent version of this document.

This statement has been drawn up in both Dutch and English. If the English version shows differences with the Dutch version, we adhere to the Dutch version of this statement.