Basecone N.V. privacy policy

Version 0.1

This page was last modified on 26 January 2018.

We are conscious of the trust you have placed in us, and therefore see it as our responsibility to protect your privacy. On this page we tell you about what data we collect when you use Basecone N.V.'s website and/or services, why we collect these data and how we use them to improve your user experience. This will enable you to understand exactly how we work.

Basecone N.V. respects the privacy of all users of its website and ensures that the personal information you provide us is treated confidentially. Basecone N.V. acts in accordance with the Personal Data Protection Law and, from 25 May 2018, the General Data Protection Regulation.

1. Who are Basecone?

Basecone is the public limited company Basecone N.V., established and having its registered office at Eemweg 8, (3742 LB) Baarn, registered in the Commercial Register of the Chamber of Commerce under number 55299245.

2. What personal data does Basecone collect and process?

Use of our services

Purchasing a subscription

On the Basecone website you can view the subscriptions that Basecone offers and purchase a Basecone subscription. When you register for one of our services, we ask you to provide the following (personal) data:

Subscription data:

- desired subscription;
- user name;

Your data:

- sex;
- first name and surname;
- telephone number;
- email address;
- name and locality of accountant;

Your business data:

- legal form;
- business name;
- first line of billing address;
- postcode and locality;
- email address;

Payment data:

• IBAN and account holder's name.

Online demonstration

On the website you can register for an online demonstration (webinar) of Basecone's services. To enable you to register for this, Basecone will ask you for your first name and surname, email address and (optionally) your telephone number.

Communication and chat sessions

When you send email or other messages to us, for example via the website's chat function, we store these messages. Sometimes we may ask you for personal details that are relevant to the particular situation. This makes it possible to deal with your questions and answer your requests. The data are stored on secure servers of Basecone or a third party.

Automatically generated data

To ensure that the website works optimally, automatically generated information about your use of the site is collected and processed. Optimisation of the services includes making technical adjustments, for example to ensure that pages are properly displayed and to make the website secure.

The information that is collected consists of the type of device (computer, mobile, tablet) that you use, your IP address (a device number by which your device can be recognised), the browser type, the operating system you use, and the pages you visit on the website and the items you view. We also record the host name associated with the IP address, log-in session data and chosen parameters.

3. For what purposes and on what legal grounds is the collected information used?

Purposes

Your information will be used for the following purposes and on the following legal grounds:

Where use is necessary for the execution of an agreement to which you are a party:

- To make use of the website possible;
- To invoice you for your subscription and use of Basecone services;

Where processing is necessary to promote the legitimate interests of Basecone:

- To send you information about Basecone's own products and services and to respond to any questions and/or complaints you may have;
- To compile anonymised statistical data;
- To secure, adapt and improve the website;

Where you have given permission for the use of your data or where its processing is necessary to comply with a legal obligation on the part of Basecone:

• To provide information about you to third parties if you have given permission for this or on the basis of legislation and/or regulations.

Basecone wants to keep you informed about its evolving services. For example, Basecone will let you know if the range of subscription options is extended. Basecone can also keep you informed of actions that are and/or will be organised by it.

If you do not wish to receive email from Basecone, you can indicate this by sending an email to support@basecone.com. There is also an option to unsubscribe included in every email sent to you by Basecone.

Use by third parties

If you provide personal data to Basecone in connection with Basecone's services, these personal data will not be shared with third parties, except and to the extent that is stated in this privacy policy.

Basecone may provide your data to third parties if you have expressly given permission for this in relation to a particular third party, if it is required in the context of your use of Basecone's services and/or to the extent that such data cannot be traced personally back to you (such as automatically generated information, which does not include your IP or MAC address).

This means that Basecone can outsource activities to third parties. These third parties will process your personal data exclusively on the instructions and on behalf of Basecone. A list of third parties that Basecone uses can be found here. This list is updated whenever changes occur. In a few incidental cases information may be shared internally if this is beneficial for the service provided to the customer. Basecone employees are required to respect the confidentiality of your data.

Finally, Basecone can share your personal data with third parties if it is required to do so on the basis of laws and/or regulations, if it is compelled to do so as a result of legal proceedings and/or if it deems it necessary to protect its own rights.

Third-party hyperlinks

The website may contain hyperlinks which take you out of Basecone's environment and onto a website belonging to another party. Basecone has no control over third-party services and/or websites to which links are provided. It may therefore be the case that a different privacy statement applies to these third-party services and/or websites. This privacy policy only applies to personal and other data processed by Basecone. Basecone accepts no responsibility or liability whatsoever for the operation and/or content of third-party services and/or websites.

4. For how long does Basecone store your personal data?

Your personal data will be stored carefully and for no longer than is necessary for the purpose for which they were obtained. The maximum retention period is ten years after termination of the contract or after the last processing of the personal data. Unless legislation requires Basecone to keep your data for longer, Basecone applies the legal retention periods.

5. Where are your personal data stored?

Your data are stored on secure servers of Basecone or a third party. Basecone uses servers in Europe.

6. How is your personal information protected?

Basecone has taken appropriate technical and organisational measures to protect your personal data against loss or against any form of unlawful processing. For more information on how Basecone organises this protection, visit <u>https://www.basecone.com/beveiliging-beschikbaarheid/</u>.

7. Cookies

Basecone may use cookies via this website. These save information in the form of a text file on the hard disk of your device. Cookies are used to make the website more user-friendly and to obtain

information about its quality or effectiveness. For more information, see our cookie statement https://www.basecone.com/privacy-cookies/.

8. How do you view, correct and transfer your data?

If you wish to view the data that has been stored about you at Basecone, you may request access to it. Your request can be sent to <u>support@basecone.com</u>. Basecone will respond to your request within four (4) weeks.

If you wish to make changes to the data you have seen as a result of your access request, you may make a request to Basecone at the email address mentioned above. You may ask Basecone to alter, correct, supplement, delete or restrict your data. Basecone will respond to your request within four (4) weeks. If Basecone rejects your request, it will indicate in its reply why the request to amend the data has been rejected.

You also have the right to obtain and arrange for the transfer of the personal data you have provided in a current, structured and readable form. This request can be sent to support@basecone.com.

9. Can this privacy policy be changed?

This privacy statement can be changed. Such changes will be announced on this website. We therefore advise you to view this privacy statement on a regular basis.

10. To whom can you make a complaint?

If you have a complaint about the use of your personal data which you are unable to resolve with Basecone, you can also submit your complaint to Wolters Kluwer Tax & Accounting via <u>NL-TAA-CSO@wolterskluwer.com</u>. If you wish to take the matter further, you can contact the data protection officer, Nathanja de Kruijff, <u>nathanja.de.kruijff@wolterskluwer.com</u>, telephone number +31612573262.

11. Questions and feedback

Basecone regularly checks on its compliance with this privacy policy. If you have any questions about this privacy policy, please contact us via NL-TAA-<u>compliance@wolterskluwer.com</u> or <u>nathanja.de.kruijff@wolterskluwer.com</u> or send a letter to Basecone, Eemweg 8, 3742 LB Baarn.