

Privacy policy of Twinfield International N.V.

Version 0.1

This page was most recently modified on September 8, 2017.

We appreciate the confidence that you have placed in us and accept our responsibility for protecting your privacy. On this page we explain which data we collect when you use the website or services of Twinfield International, why we collect it, and how we use it to improve your user experience. That way, you'll know precisely how we work.

Twinfield International respects the privacy of all users of its website and ensures that the personal information you provide to us is treated confidentially. Twinfield International acts in conformity with the Dutch Personal Data Protection Act and the General Data Protection Regulation that will be coming into effect on May 25, 2018.

1. About Twinfield International

Twinfield International is the public limited company Twinfield International N.V., established at De Beek 9 in (3871MS) Hoevelaken, and listed in the Commercial Register of the Dutch Chamber of Commerce under number 30173996.

2. What personal data does Twinfield International collect and process?

Use of our services

Subscriptions

You can use Twinfield International's website to view the subscriptions it has to offer and take out the subscription that suits you best. When you sign up for one of our services we will ask you to provide the following information and personal data:

Subscription details:

- the subscription you want
- your user name

Your personal data:

- sex
- first name and surname
- telephone number
- e-mail address
- name and location of your accountant

Your company details:

- legal form
- company name
- billing address
- zip code and town/city
- e-mail address

Payment details:

- IBAN and name details.

Online demonstration

You can use the website to register for a webinar demonstrating Twinfield International's services. For that purpose Twinfield International will ask you for your first name and surname, your e-mail address, and (optionally) your telephone number. *Communication and online chat sessions*

If you send us e-mails or other messages, e.g. via the website's online chat function, we will keep those messages. Sometimes we will ask you for personal data that is relevant to the situation in question. That makes it possible for us to process your questions and respond to your requests. The data is stored on the secure servers of Twinfield International N.V. or a third party. Go to webinar opt in for prospects

Automatically generated data

Automatically generated information about how you use the website is collected and processed to ensure that the website works as well as possible. Optimizing the service entails making technical adjustments, such as those needed to properly display payments and protect the website.

The information collected is the type of device (computer, mobile phone, tablet) you are using, your IP address (which makes it possible to identify your computer), the type of browser, the operating system you use, the pages you visit on the website, and which items you view. We also register the host name belonging to the IP address, login session details, and selected values.

3. For what purposes is the collected information used, and what are the legal grounds for this?

Purposes

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

The information needs to be used to perform the agreement to which you a party:

- To make it possible to use the website
- To bill you for your subscription and your use of Twinfield's services

The information is processed to protect the justifiable interests of Twinfield International:

- To send you information about Twinfield International's own products and to respond to your questions or complaints
- To draw up anonymized statistical information
- To protect, modify, and improve the website.

You have consented to the use or processing of information needed to meet Twinfield International's legal obligation:

- To disclose information about you to third parties with your consent or in accordance with statutory requirements.

Twinfield International wishes to keep you informed of how its services develop. Twinfield International would like to let you know if additions are being made to the subscription options, for instance. Twinfield International can also keep you informed of campaigns it is organizing.

If you would prefer not to receive any e-mails from Twinfield International, please let us know by sending an e-mail to NL-TAA-CSO@wolterskluwer.com. All e-mails that Twinfield International sends to you also contain a link that you can use to unsubscribe.

Use by third parties

If you provide Twinfield International with personal data related to its services, that personal data will not be shared with third parties other than as explained in this privacy policy.

Twinfield International may issue your data to third parties if you have explicitly given your permission for it to be given to a specific third party, if this is necessary to your use of Twinfield International's services, or if the data cannot be traced back to you as a person (such as automatically generated information, apart from your IP or MAC address).

Twinfield may engage third parties to outsource work, for example. These third parties process your personal data exclusively on the instructions of and for the purposes of Twinfield International. Information may occasionally be distributed internally if this has a favorable effect on the service given to the customer. Twinfield International's employees are obliged to treat your data confidentially.

Finally, Twinfield International may issue your personal data to third parties if it is legally obliged to do so, is compelled to by a court order, or if it considers this necessary to protect its own rights.

External links

The website may contain hyperlinks that take you out of Twinfield International's environment to the website of another party. Twinfield International has no control of the services or websites of linked third parties. It is therefore possible that these third party services or websites are subject to another privacy statement. This privacy statement relates solely to the information and personal data processed by Twinfield International. Twinfield International accepts no responsibility or liability whatsoever for the services and websites of third parties.

4. For how long does Twinfield International keep your personal data?

Your personal data is stored carefully and is not kept for any longer than necessary for the purposes for which it was obtained. The maximum retention period is ten years after termination of the contract or the most recent processing of the personal data. Twinfield International operates the statutory retention periods unless it is legally obliged to keep your data for longer.

5. Where is your personal data kept?

Your data is stored on the secure servers of Twinfield International or a third party. Twinfield International uses servers in Western Europe.

6. How is your personal data protected?

Twinfield International has taken appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing. For more information about how Twinfield International arranges this protection, please see <https://www.twinfield.co.uk/twinfield-the-most-secure-solution-for-your-accounts/>.

7. Cookies

Twinfield International may use cookies via this website. Cookies are used to store information in the form of a text file on your device. Cookies are used to make the website user-friendly and to gather information about its quality and effectiveness. For more information, please see the cookie statement at <https://taxnl.wolterskluwer.com/algemene-voorwaarden/cookie-statement/>.

8. Viewing, correcting and transferring your data

If you would like to view the information that Twinfield Information holds about you, you have the right to make a request to inspect it. You can send this request to NL-TAA-CSO@wolterskluwer.com. Twinfield International will respond to your request within four weeks.

If you wish to make changes to the information you have seen in response to your request to inspect it, you can use the e-mail address given above make a request to Twinfield International to that effect. You can ask Twinfield International to change, correct, supplement, delete, or hide your information. Twinfield International will respond to your request within four weeks. If Twinfield International turns down your request, it will give the reasons for this in its response.

You also have the right to be given the personal data that you have provided in a standard, structured, and readable form and to transfer it. You can send this request to NL-TAA-CSO@wolterskluwer.com.

9. Is this privacy policy subject to amendment?

Changes may be made to this privacy statement. The changes are announced on the website. We therefore advise you to view this privacy statement regularly.

10. Complaints

If you have a complaint about the use of your personal data and are unable to resolve the issue with Twinfield International, you can also lodge a complaint with Wolters Kluwer Tax & Accounting at NL-TAA-CSO@wolterskluwer.com. Further escalations can be directed to the data protection officer, Nathanja de Kruijff, nathanja.de.kruijff@wolterskluwer.com, telephone number +31 (0)612573262.

11. Questions and feedback

Twinfield International regularly checks its compliance with this privacy policy. If you have any questions about this privacy policy, please contact us via NL-TAA-compliance@wolterskluwer.com or nathanja.de.kruijff@wolterskluwer.com or send a letter to Twinfield International, De Beek 9-15, 3871 MS, Hoevelaken, The Netherlands.