

PRIVACY POLICY

This website is operated by Brand New Galaxy Holding B.V. (“BNG”), located at Prins Hendriklaan 26, 1075 BD, in Amsterdam, the Netherlands. How we handle your personal data is set out in this Privacy Policy. You can be confident that we handle your personal data with due care. BNG is the controller – as described in the General Data Protection Regulation – of your personal data.

Who is this Privacy Policy intended for?

This policy is important to all persons who visit our websites or persons who have subscribed to newsletters or events, and persons who have applied for a job with us. Furthermore, if you are a client of us, or your company is a client of ours and you have contacted us for information on our products or services, then you might want to read this policy too.

We will process your personal data, or that of your related individuals, for carrying out business with you. For example, when we record and use personal data relating to contact persons at companies to which we provide services and with whom we are in correspondence. Further information concerning why we process data will be set out in this policy.

We have a Data Protection Officer (personal.data.privacy@brandnewgalaxy.com) which can be contacted for your questions about data protection at BNG or this policy.

What is personal data and what do we collect?

Personal data is information that says something about you. The best known forms of personal data are your name, address, email address, age and date of birth. Personal data also includes your phone number, mobile device information and even your IP address. These kind of details we might gather when you contact us directly.

We do not process special categories of data.

What is the legal basis for our processing of your personal data?

Processing of personal data is only allowed when it is based on one of the “grounds” permitted by law. This means that we may use your personal data for one or more of the following legal grounds:

- o to serve our legitimate interest or those of others
- o to perform our contract with you
- o to comply with laws and regulations
- o when you have given your consent

If you have given us your consent for the processing of your personal data, you may withdraw this consent at any time by sending an e-mail to our DPO.

For what purposes do we use your personal data?

We use your personal data to help make our operations and our services as effective, reliable, and efficient as possible this is one of our legitimate interests.

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We will provide you with information that you have requested e.g. a newsletter or bulletins. We will only send you this if we have collected your consent (if necessary) or if we have a legitimate interest.

If you have specific queries regarding our services we will use your personal data to respond and further communicate with you. We would like to stay in touch with you once you have become a client. We use your personal data for that based on our legitimate interest.

We try to provide you with better ways of accessing our information from our websites and therefore use your personal data. This is another example of our legitimate interest.

If we would like to use your personal data for any other purposes than those listed below, we can only do so if this is in line with the purpose(s) for which we have initially have collected your personal data. Otherwise, we first need to obtain a new ground to process your personal data for those other purposes.

Use of your personal data for direct marketing purposes

We use your personal data to send marketing materials – with your consent or where we have a legitimate interest, we can send you marketing information to keep you informed about events, special offers, opportunities and BNG's current and future products and services. When we contact you about marketing communications, we will contact you by e-mail or through newsletters, brochures or magazines (mailings). If you no longer wish to receive surveys or marketing information by e-mail from us, you can easily unsubscribe by following the unsubscribe link in the e-mail. If you no longer wish to receive any marketing material please contact us.

Use of cookies

We make use of cookies and similar technology on our websites. For more details, see our Cookie Statement [https://ams.brandnewgalaxy.com/wp-content/themes/bngams/docs/cookies_bng_ams.pdf]. Personal information is captured by our cookies in the event of error events when you visit our websites to allow us to improve our online services to you.

Other parties using your personal data

Sometime its necessary to provide your personal data to third parties. Our service providers (for example our it providers) which will be under our control. Competent (public) authorities which need a legal basis for their processing.

Automated Decision making

The personal data you provide will not be used to make automated decisions about you.

Third Party Websites

Our website may link to third party websites which we do not operate or endorse. These websites may use cookies and collect your personal information in accordance with their own privacy policies. This privacy policy does not apply to third party websites and we are not responsible for third party websites.

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Security

To ensure the highest possible level of protection for your information, we invest in our systems, procedures and people. We have implemented different kinds of organizational and physical measures to secure your personal data.

Personal data outside Europe

We may occasionally share personal data with other companies or organisations outside Europe, for instance in the context of an outsourcing agreement. In that case, we will verify that the country has adequate equivalent protections in place, or we will sign separate agreements with those parties that meet the GDPR standards. If you have any question concerning this, please contact our DPO.

Retention periods of your data

As set out under the General Data Protection Regulation, we keep personal data in any event for as long as is necessary to achieve the purpose. The law does not stipulate specific storage periods for personal data. Other legislation may specify minimum storage periods, however. If it does, we are under the obligation to observe these periods. Such legislation includes tax laws or laws governing financial undertakings specifically. Another reason for which we may keep your data longer is if we become involved in a lawsuit or other legal proceedings.

What rights do you have?

Right to object to processing for direct marketing purposes

If you no longer want to receive marketing information, you can unsubscribe at any time. All marketing messages by e-mail include this possibility, and you can follow the link at the bottom of the marketing messages to exercise this right easily.

Right of access, right to rectification, right to be forgotten, right to restriction of processing

- o You have the right to access your data. For this purpose, you can ask us what data are registered and what they are used for.
- o You have the right to have the data BNG collects from you corrected, changed or supplemented if these are incorrect or incomplete.
- o You have the right to ask who has access to your data. You can ask us what data are registered and who has/had access to them.
- o In certain legal instances, you have the right to have your data erased.
- o In certain legal instances, you have the right to have less data processed by us.
- o You have the right to object to the processing of your personal data by us.

If you would like to use one of these rights, please contact our DPO by e-mail j.piwek@brandnewgalaxy.com.

Right to data portability

If we process your personal data on the basis of your consent or on the basis of the contract we concluded with you we can arrange that you receive the data that you have provided to us, which we store by automated means, so you can provide the

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data to another party you choose. This is referred to as data portability. Information which is processed for the purpose of a legal obligation or our legitimate interests is not covered by this obligations.

Do you have a complaint or want to ask a question?

Please contact us if you have any questions about this Privacy policy. We will be happy to help you.

You also have the right to take your complaint to the Data Protection Authority (*Autoriteit Persoonsgegevens*).

Changes to the Privacy Policy

Changes to the law or our services and products may affect the way in which we use your personal data. If this happens, we will publish an updated version of our statement on our website.