



# GYRO

C E N T E R

## GYRO DC BV Privacy Policy

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## Privacy Policy & Cookie Statement

We are committed to safeguard the privacy of

- the visitors of our GYRO DC's websites;
- our customers using GYRO DC's services.

This privacy policy applies where GYRO DC acts as a data controller with respect to the personal data of our website visitors, customers and employees; in other words, where we determine the purposes and means of the processing of that personal data. GYRO DC uses cookies solely for analytical purposes. As these non-privacy intrusive cookies do not reveal the identity of the websites' visitors, we will not bother our visitors with cookies disclaimers or approvals. In this notice, "we", "us" and "our" refer to GYRO DC.

## How does GYRO DC use your personal data

In this section we determine:

- the general categories of personal data that we may process;
- the source and specific categories of that data in case personal data was not obtain directly from you;
- the purposes for which we may process personal data;
- the legal bases of the processing.

**Usage Data:** We may process data about the use of GYRO DC's commercial websites, portals and services. The Usage Data may include your source IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, log information generated by your consumed services as well as any interaction highlights between you and GYRO DC. This usage data may be processed for the purposes of analysing the use of the GYRO DC websites, portals and services. The legal basis for this processing is GYRO DC's legitimate interests in ensuring network and information security of our commercial websites, portals and services.

**Marketing Data:** We may process information that you provide to us for the purpose of subscribing to our email newsletters or asking commercial information. This marketing data may be processed for the purposes of sending you newsletters or other direct marketing communication. The legal basis for this processing is consent, which can be retracted by the use of an opt-out procedure.

**Applicant Data:** We may process information you provide to us for the purpose of applying to a job vacancy. The applicant data may be processed for the purposes of providing any generic information in regards to GYRO DC and to qualify you as a suitable candidate. The legal basis for this processing is twofold:

- consent based on the conduct of submitting a résumé;
- GYRO DC's legitimate interest of retaining a history of previous applications by you.

**Enquiry Data:** We may process information contained in any request for proposal you submit to us regarding services. The enquiry data may be processed for the purposes of providing any commercial or generic information in regards to our services. The legal basis for this processing is twofold:

- consent based on the conduct of submitting a request;
- the legal requirement to retain proposal documents for a pre-defined amount of time.



**Account data:** We may process your account data. The account data may include your name, contact details, address details and ordered services. The source of the account data is you, your employer or any other user with administrative access to your portal. The account data may be processed to provide our services and to communicate with you. The legal basis for this processing is twofold:

- the performance of a service agreement between you or your employer and GYRO DC and/or taking steps, at your request, to enter into such an agreement;
- GYRO DC's legitimate interest of identifying you as a former customer to optimize new commercial communications.

**Service Data:** We may process your personal data that are provided in the course of the use of our services. The service data may include request fulfillment, incident management, problem management, change management, complain management and satisfaction surveys. The source of the service data is you, your employer or any other user with administrative access to your portal. The service data may be processed for the purposes of operating our services. The legal basis for this processing is twofold:

- the performance of a service agreement between you or your employer and GYRO DC and/or taking steps, at your request, to enter into such an agreement;
- GYRO DC's legal obligation to store financial data for a minimum amount of time.

**Financial Data:** We may process information relating to financial transactions in regards to services offered by GYRO DC. The financial data may include your or your employer's contact and address, financial, billing and transaction details. The financial data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is twofold:

- the performance of a service agreement between you or your employer and GYRO DC and/or taking steps, at your request, to enter into such an agreement;
- GYRO DC's legal obligation to store financial data for a minimum amount of time.

### **Recipients of your personal data**

We may disclose any personal data to any of our subsidiaries, our holding company and all its subsidiaries insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice. We may disclose your account data and financial data to our external law firm, insofar as reasonably required for the purposes of managing contractual risks, obtaining professional advice, or the defense of legal claims. We may disclose your account data and financial data to the appointed company auditor to support our annual audit obligation. We may use a third party SaaS provider to support our Customer Relationship Management. In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **Retaining and deleting personal data**

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain personal data as follows: Usage Data will be retained for a period of 1 year. Enquiry Data e.g. quotes, offers,... will be retained for a minimum period of 3 years following January 1st of the next year.

**Financial Data** will be retained for a minimum period of 7 years following January 1st of the next year, and for a maximum period of 10 years.

**Service Data** will be retained for 7 year after the termination of the service agreement, following January 1st of the next year. After that period the service data will be either deleted or anonymized.

**Account Data** will be retained for a maximum of 7 year after the termination of the service agreement, following January 1st of the next year. After that period the service data will be deleted or anonymized or earlier when you object to the processing. In some cases, it is not possible for GYRO DC to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

**Applicant Data** retention will be based on the option to object to this processing.

**Marketing Data** retention will be based on the option to opt-out.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

### **Amendments**

GYRO DC may update this notice by publishing a new version on our website.

You should check this page occasionally to ensure you are satisfied with any changes to this notice.

### **Your rights**

In this section, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Your principal rights under data protection law are:

- the right to access;
- the right to rectification;
- the right to erasure
- the right to object to processing;
- the right to data portability;
- the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do. You have the right to access your personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. We will supply to you a copy of your personal data, however we may withhold personal information that you request to the extent permitted by law . The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. If you are a consumer of GYRO DC's services, you can access your account data, service data and financial data by visiting the administrative control panel noted in the documentation. You



have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include: you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for compliance with a legal obligation or for the exercise or defence of legal claims. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is the purpose of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the exercise or defense of legal claims. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. To the extent that the legal basis for our processing of your personal data is:

- consent; or
- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and
- such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by written notice to us on [support@gyrocenter.nl](mailto:support@gyrocenter.nl).

## **Cookies**

Through our websites analytical cookies and cookies related to social media options may be placed.

### **Analytical cookies**

Analytical cookies record how visitors use our websites. With this information, the use of our websites can be analysed, and statistics can be generated. This way we can understand our visitors better and with that knowledge, we can improve their experience. For this purpose, we use Piwik Analytics. In that context analytical cookies can be placed on our websites by of the provider of this service: Piwik Pro Group. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and pages visited. See all cookies created by Piwik Pro along with expiration times [here](#). For more info, see Piwik Pro [privacy policy](#).

### **Social media cookies on our blog websites**

To offer the visitors of our blog websites the opportunity to share content, we may place social media buttons on these websites. The cookies related to social media are not placed nor read by us, but by the relevant social media provider. We have limited knowledge and no control over these cookies. We therefore accept no responsibility or liability for these social media cookies or how those particular social media providers engage with the collected information.

**Refusal and disposal of cookies**

You can set up your browser so that no cookies are stored at all, or that you allow or refuse any cookie, or that all cookies are deleted when you exit your browser. Cookies are placed on each computer you use for visiting websites. If you no longer want to receive cookies, you should change the settings on all computers that you use.

**Camera surveillance**

Camera surveillance is a critical part of GYRO DC's security plan. The use of camera surveillance and video registration is subject to strict rules laid down in the existing privacy legislation (Avg). Surveillance systems in data centers that are not owned by GYRO DC are subject to the privacy policy of the owner of the relevant data center. Surveillance cameras can be installed in GYRO DC property locations where the safety of the location, staff and visitors could be improved. When other options with a lower privacy impact are available that result in the same level of security, GYRO DC will use them. Signage at the location provides notification of camera surveillance. Camera use is limited to situations that do not violate the reasonable expectation of privacy as defined by law. Privacy complaints about camera use can be submitted to the Management Team of GYRO DC. Camera surveillance will take place in a professional, honest and legal manner and will not be used for monitoring individuals. Only authorized security personnel have access to surveillance camera data. Recorded images are not routinely checked and are only judged in the event that GYRO DC has a valid basis for judging the recorded images. Registered information is kept in a secure location for a maximum of 14 days. GYRO DC will keep a camera surveillance processing register in accordance with the Avg. Information obtained through video surveillance is used solely for safety, security, compliance with GYRO DC policies and for enforcement purposes. Camera surveillance is only carried out by a professional security company in compliance with international and local laws and regulations. Application for placement of monitoring equipment must be approved by the MT of GYRO DC. When a surveillance system monitors (parts of) the workplace, approval from GYRO DC's outside legal counsel must be obtained prior to installation. The use of private surveillance equipment is prohibited.

**Privacy office**

Our data protection team can be contacted on:

Datacenter Support

[support@gyrocenter.nl](mailto:support@gyrocenter.nl)