

## Privacy Statement

This privacy statement applies to the website of CLINSH (hereinafter referred to as “CLINSH” or “we”). By this statement we explain to you our privacy policy, the purposes for data processing and your privacy rights.

### Who is the data controller?

CLINSH is the controller of your personal data. We have our registered office at Nijenborgh 6, 9747 AG at Groningen and we are registered at the Chamber of Commerce under number: 69200556.

### What is our general privacy policy?

Your privacy is very important to us. In order to guarantee your privacy, we always act in accordance with the EU General Data Protection Regulation.

We only use your data to provide you a service / to communicate with you. We will not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

### What is personal data?

If you visit our website, we may collect your personal data. Personal data is any information relating to an identified or identifiable natural person.

### Which personal data do we collect and for which purpose?

We only collect personal data provided by you or through cookies.

You are not legally obligated to provide personal data. If you want to use our services or want us to communicate with you, we do need the requested data. Please know that we only collect the data necessary for the specific purpose.

If you contact us, for example via our contact form, we store your name, e-mail address, organisation, phone number and any other personal data provided by you. We use your data only to communicate with you, to answer your questions and/or to make preparations to enter into a contract with you.

### Do we process special categories of personal data?

We do not process any special categories of personal data, such as data relating to or concerning health, racial or ethnic origin, political opinions, religious or philosophical beliefs.

### How long do we store your data?

We store your personal data as long as necessary to communicate with you or the project is finished.

## Do we share your data?

We only share your data if this is necessary to communicate with you, with parties who are part of our services or when we are legally obligated to share data.

If we share your data in order to perform our contract, we enter into data processing agreements with these parties in order to protect your privacy.

With parties who store data outside the EU, we provide adequate safeguards. We only enter into agreements with these parties if the European Commission decided data transfer is safe (adequacy decision) or if similar measures have been taken to ensure that your data is also securely processed there.

## How do we protect your data?

Zephyros considers the security of your data very important. For that reason, we take appropriate security measures in order to your data from being lost or being accessible to unauthorised third parties. Some of these measures can be found below:

- our website is secured with an SSL certificate so personal data is sent encrypted;
- we have a strict access policy (need to know). Only authorised personnel / third parties have access to your personal data;
- we conclude agreements with third parties who process your personal data on our behalf.

## Do we use cookies?

We make very limited use of cookies. Please read more about our cookie use in [our cookie statement](#).

## What rights do you have?

You have different rights regarding your privacy:

- right to access;
- right to rectification;
- right to deletion (right to be forgotten);
- right to restriction of processing;
- right to transfer data (data portability);
- right of objection; and
- right not to be subject to a decision based solely on automated processing.

You can submit any notice regarding your privacy rights to us [by email](#). Please write in the subject line "Personal data".

To ensure that a request / objection regarding your data has been submitted by you, we kindly request you to enclose a copy of your ID certificate. Please make sure your passport photo, MRZ (machine readable zone, the strip with numbers on the ID certificate), document number and Citizen Service Number (BSN) are made invisible to protect your privacy. We will respond to your request as soon as possible.

If you have complaints about our data processing policy, please inform us by sending [an e-mail](#) to our email address. You also have the right to file a complaint with the Dutch supervisory authority, the Autoriteit Persoonsgegevens, by using [this link](#).

### What happens in case of changes?

Due to possible changes in privacy regulations, this privacy statement can be altered. Please be advised to regularly read this statement.

N.B. This statement is governed by Dutch law.

May 2022.