

Verklaring over privacy en cookies op Neutral Freight Academy B.V.

Introduction

This is the privacy notice for Neutral Freight Academy B.V.

Neutral Freight Academy B.V. respect your privacy and is committed to protecting your personal data.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), use our services, or register to attend our events. We are committed to protecting your personal data and this privacy notice will explain how we look after it, what rights you have, as well as how the law protects you.

This privacy notice is issued on behalf of Neutral Freight Academy B.V., so when we mention “Neutral Freight Academy B.V. “we”, “us” or “our” in this privacy notice, we are referring to Neutral Freight Academy B.V., responsible for processing your data. Neutral Freight Academy B.V. is the controller and responsible for this privacy notice.

This privacy notice should be read together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or otherwise processing personal data about you so that you know how and why we are using it. This privacy notice supplements those other notices and is not intended to override them.

Contact details

Our full details are:

Full name of legal entity: Neutral Freight Academy B.V.

Postal address: Changiweg 1; 1437EP Rozenburg-Schiphol. The Netherlands

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 10 July 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

How this privacy notice operates with our other privacy notices

It is important that you read this privacy notice together with any other privacy notices that we may provide on specific occasions when we are collecting or otherwise processing personal data about you so that you know how and why we are using it. This privacy statement supplements those other notices and is not intended to override them.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- Contact Data includes billing address, delivery address, email address and telephone numbers
- Financial Data includes bank account and payment method details
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, together with CCTV and other visual or audio recordings, including photographs
- Profile Data includes your interests, attendance at our events, preferences, feedback and survey responses – which may include Special Categories of Personal Data
- Usage Data includes information about how you use our website, products and services
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect

Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect personal data from and about you including through:

- Direct interactions.
- You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- make enquiries of, and/or seek to procure our, services
- contact us via one of the communication means set out on our website
- enter into an agreement with us for the provision of, or receipt of, services
- request marketing and other promotional material to be sent to you
- enter a survey
- give us some feedback

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation
- Where you have consented to its use

Purposes for which we will use your personal data

We may use your personal data to:

- Carry out our obligations arising from any agreements entered into between our clients and us (which will usually be used for the provision of our services)
- Carry out our obligations arising from any agreements between our clients and us (which will usually be for the provision of our services, where you may be a sub-contractor, supplier or customer of our client)
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, providing you have consented to be contacted for such purposes
- Seek your thoughts on the services we provide
- To process and consider your job application, where we use our legitimate interests to process your personal data for assessing your job application and to keep you updated throughout the application process

Marketing information from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing. This is in line with our legitimate interest.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Neutral Freight Academy B.V. for marketing purposes.

Opting out

We try to always include an opt out option of any marketing messages. Where this is not possible, you can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Cookies

For more information about the cookies we use, please see our **cookie policy** below.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data (also known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Request correction of the personal data we hold about you. This allows you to have any incomplete or inaccurate data we hold about you corrected
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which, if applicable, we will notify you
- Object to processing of your personal data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to our processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in any of the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request the transfer of your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly-used and machine-readable format. Note that this right only applies to automated information which you initially provided

consent for us to use or where we used the information to perform a contract with you

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will notify you if this is the case

If you want to exercise any of the rights set out above, please contact us.

Should you wish to access your data, please note the following:

- you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances
- we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response
- we try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated

You have the right to make a complaint at any time to the Dutch Data Protection Authority. We would, however, appreciate the chance to deal with your concerns before you approach the Dutch Data Protection Authority so please contact us in the first instance.

COOKIE POLICY

Our website www.nfa-recruitment.nl (the “Website”) uses technology known as cookies in order to capture information regarding the use of the Website. We inform you that we use cookies in order to facilitate your browsing on our Website, to identify you from other users, provide you with a better experience in its use, or to identify problems in order to improve our Website. Furthermore, should you consent to such, we will use cookies that will allow us obtain more information about your preferences and personalize our Website in accordance with your individual interests. The purpose of this cookie policy is to inform you in a clear and concise manner about the cookies used on our Website (the “Cookie Policy”). We inform you that this document is complemented by the Legal Notice, the Privacy Policy and the General Contracting Terms and

Conditions, which in their entirety comprise the legal texts governing the Website. Should you wish to receive more information regarding the cookies we use on the Website, you may send an email to the following address: info@nfa-recruitment.nl

WHAT ARE COOKIES?

A cookie is a file that is downloaded onto your computer in order to store data that can be updated and recovered by the entity responsible for its installation. The information gathered using the cookies may include the date and time of visits to the Website, the products consulted, pages visited, time spent on our Website and the websites visited immediately before and after. By using this information, we can focus and adjust the services in the most effective manner in order to provide you with a better experience as a user.

TYPES AND PURPOSES OF COOKIES

Cookies can be classified into a variety of categories depending on their characteristics. Our Website uses the cookies that are described as follows:

Own cookies

These are cookies that are sent to your computer and managed exclusively by ourselves in order to improve the functioning of the Website. The information we gather is used to improve the quality of our service and your experience as a user.

Third-party cookies

If you interact with the content of the Website, third-party cookies may also be installed. Third-party cookies are those installed by a domain other than our website. We cannot access the data stored on the cookies from other websites when you browse said websites. On our Website we also use the Google Analytics audience measuring system, a web analysis tool by Google which allows us to know how users interact with our Website.

“Analytical” cookies

These are cookies which, together with our server log files, allow us to know the total number of users visiting our Website and which parts are most popular. Thus, we are able to obtain information that can help us improve browsing and provide a better service to users and customers. These types of cookies allow us to improve usability and experience when using our Website.

When browsing and remaining on our Website you consent to the use of the cookies mentioned above, the periods detailed and the conditions contained in this Cookie Policy.

CONSENT

DISABLE AND BLOCK COOKIES

In any case, we inform you that given that cookies are not necessary for the use of our Website, you can block or disable them by activating the configuration on your browser which will allow you to refuse the installation of all cookies or some of them. The majority of browsers warn of the presence of cookies or automatically refuse them. If they are rejected, you will be able to continue using our Website, although the use of some of its services may be limited and therefore your experience on our Website will be less satisfactory.

WITHDRAW MY CONSENT

If at any time you would like to withdraw your consent regarding this Cookie Policy, you must delete the cookies stored on your computer using the settings and configurations of your Internet browser. For further information on the elimination, disabling or blocking of cookies, please visit: <https://www.aboutcookies.org/>

CHANGING THE CONFIGURATION AND SETTINGS OF COOKIES

Unless you have altered the settings of your browser, our system will create cookies whenever you visit our Website. Please bear in mind that all Internet browsers allow the settings to be changed.

CHANGES TO THE COOKIE POLICY

It is possible that we may update the Cookie Policy of our Website; therefore, we recommend reviewing this policy every time you access our Website in order to be adequately informed regarding how and why we use cookies. The Cookie Policy was last updated on 10 July 2023.