Data Protection and Privacy Policy

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Data Protection and Privacy Policy

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1. Introduction

1.1 This Data Protection and Privacy Policy (the "**Policy**") describes how Springboard Network B.V. ("**us**", "**we**" or "**our**") when acting in the role of a controller, collects and processes your personal data relating to the your use of our website,

1.2 The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. Collecting personal data with cookies

2.1 By visiting and using our website, cookies are collected and used based on your consent. Information in the cookies include:

a. browser type
b. device type
c. IP Address
d. geographical location at login (the area - not specific address)
e. search terms on our website
f. search terms on other website

2.2 Cookie data are used for: improvement of the website and user experience.

2.3 Our use of cookies for the purpose of collecting personal data is carried out in accordance with section 3 of the Executive Order (No. 1148 of 9 December 2011).

2.4 If you wish to limit or decline the cookies placed on your computer when visiting our website you can do so at any time by changing your browser settings. However, you should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows you to delete cookies collectively or individually. How this is done depends on the browser you use. Remember to delete the cookies in all browsers, if you use several different browsers.

2.5 We disclose and/or share cookie data with Google. Cookies are by definition personal data since they come from a personal device. The cookie information collected from springboard-network.com via Google

Analytics is anonymous data and can't be traced back to any individual person.

3. Types of personal data processed

3.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data:

a) IP addresses
b) name
c) address
d) telephone number
e) title
f) company name
g) e-mail

3.2 If we need to collect more personal data than specified above, we will inform you by updating this Policy.

4. Purposes of processing the personal data

4.1 We will only process your personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR. The personal data we collect about you is processed for the following purposes:

a) To provide support and service messages, including responding to questions and potential complaints
b) To provide service messages and information.

5. Legal basis for processing personal data

5.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

a) The legal basis for the processing of such personal data is consent, in accordance with GDPR, Article 6(1)(a). You can withdraw your consent at any time by contacting us via the contact details provided

at the end of this Policy. If you withdraw your consent, the personal data processed will be deleted, unless it can or must be processed in order to comply with legal obligations.

b) The processing is necessary for the performance of a contract to which the data subject is a party in accordance with GDPR, Article 6(1)(b), the first indent.
c) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data in accordance with GDPR, Article 6(1)(f).
d) The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract in accordance with GDPR, Article 6(1)(b), last indent.
e) The processing is necessary to comply with applicable legislation in accordance with GDPR, Article 6(1)(c).

6. Disclosure and transfer of personal data

6.1 We only transfer personal data to other entities when legally permitted or required. Our organization is part of a group of companies where, depending on the circumstances, personal data are shared.

6.2 We transfer personal data to the following recipients from the EU/EEA:

a) Banks (for example in connection with payments etc.)
b) Collaborators
c) Processors
d) Suppliers
e) Tax authorities (for example in connection with accounting etc.)

6.3 From time to time we use external entities as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless applicable law allows for such transfer and processing.

Where the external parties are acting in the role of processors, the processing is always based on a data processing agreement in accordance with the requirements under GDPR.

Where the external parties are acting in the role of controllers, the processing of personal data is based on such external parties' data privacy policy and the relevant legal bases which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

6.4 We transfer personal data to countries or international organisations outside the EU/EEA. Personal data is transferred to the following countries

not subject to an article 45 adequacy decision: USA.

Such transfers are based on the standard contractual clauses about data protection made or approved by the EU Commission and possibly approved by a national data protection agency, ensuring a sufficient level of protection.

6.5 If you have any questions about our use of processors, cooperation with other controllers, including our subsidiaries, or the transfer of data to third countries, you may contact us for more information or documentation of our legal basis for such transfers.

7. Erasure and retention of personal data

7.1 We ensure that the personal data is deleted when it is no longer necessary for the processing purposes described above. However, we retain your personal data to the extent that we are legally obligated, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of your personal data, you may contact us by using the email mentioned in the last section of this Policy.

8. Data subject rights

8.1 As a data subject under GDPR, you have a number of rights.

8.1.1 You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.

8.1.2 You have the right to have incorrect information rectified.

8.2 You have the right to have certain personal data deleted.

8.3 You may have the right to restriction of our processing of your personal data.

8.4 You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.

8.5 You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into, or performance of a contract between you and the Organization, (2) is authorised by law, or (3) is based on your explicit consent.

8.6 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.

8.7 You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).

8.8 You can always lodge a complaint with the data protection authority.

8.9 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

8.10 More information about data subject rights can be found in the guidelines of the national data protection authorities.

8.11 Please use the contact details below if you want to use your rights.

8.12 We try to meet your wishes about our processing of personal data, but you can always file a complaint to the data protection authorities.

9. Changes to this Policy

9.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of visible notice, for example on our website or by direct message.

10. Contact

10.1 You may contact us at the below specified email if you:

a) disagree with our processing or consider our processing of your personal data infringes on the law,

b) have questions or comments to this Policy, or

c) want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at: Info@springboard-network.com

11. Company information

Springboard Network B.V.
Ecu 21
BA 8305 Emmeloord
Netherlands
KVK number: 84410027