

1 Introduction

LEVIY takes your privacy very seriously and will process and use information about you (the data subject) in a safe and secure manner. In this Privacy Statement we explain which data we process, and for what purpose. You can read about your rights with regard to our processing of your personal data. We recommend that you read this Privacy Statement carefully.

Who is LEVIY?

LEVIY is LEVIY B.V., a private limited liability company under Dutch law having its registered office at Databankweg 12H in (3821 AL) Amersfoort, listed in the trade register of the Chamber of Commerce under number 66628547.

How are you involved?

We may process your personal data for various purposes. The purposes partly depend on how you come into contact with LEVIY. That is why we distinguish the between the following manners of involvement:

- As a visitor to our website
- As a user of our digital solution (via website or app)
- As a customer of LEVIY (potential, former or current customer)
- As a job applicant

Your involvement may apply to several of the above situations. Determine this for yourself. For each situation, we provide relevant information regarding your privacy below. Finally, also read section '6 General'.

Who is responsible for your personal data?

The party who has control over the personal data is called the Controller. LEVIY delivers a digital solution to its customers. The customers themselves have control over the information in the digital solution and are therefore the controllers. In the situation that you are a user of our digital solution, we are called the Processor and your organisation is the Controller.

In other situations, we are the Controller. Questions about your personal data are best put to the Controller.

Involved as...	Controller	Processor
Visitor to website LEVIY	LEVIY	-
User of digital solution LEVIY (website or app)	Your organisation	LEVIY
Customer of LEVIY (Potential, former or current)	LEVIY	-
Job applicant	LEVIY	-

2 Involved as a visitor to our website

In this situation, LEVIY is the Controller.

Our website leviy.com has two functions. First, on the website you will find information about our company and the services we can offer.

Second, authorised users can log into a protected area via this website. This area is also directly accessible via dashboard.leviy.com. If you can log into this area, the situation as a user of our digital solution also applies to you (see section 3).

What personal data do we do process?

- Information about your activities on our website
- IP address
- Location data

Why do we process these personal data?

LEVIY analyses your behaviour on the website to improve our website and tailor our range of products and services to your preferences.

The legal basis for this is a legitimate interest, namely a commercial interest.

How long does LEVIY store my personal data?

LEVIY does not store your personal data for longer than is strictly necessary to achieve the purposes for which your data is collected.

3 Involved as a user of our digital solution

In this situation, your organisation is the Controller.

As a user of our digital solution, the situation as a visitor to our website also applies to you. Therefore, if you have not already done so, please also read section 2.

Only persons authorised by an organisation that has entered into a license or other agreement with LEVIY can access our website dashboard.leviy.com or the LEVIY app. If you have access, LEVIY will process certain personal data about you on behalf of your organisation. If you have been granted access through a LEVIY licensee and you are not employed by this organisation, then by 'your organisation' we mean this LEVIY licensee.

What personal data do we do process?

The personal details that are processed depend on the services that your organisation acquires from LEVIY.

Why does your organisation process personal data?

Depending on the services your organisation acquires from LEVIY, your personal data may, for example, be processed for the following purposes:

- Granting and being able to grant access to rights and roles within the digital solution.
- As a basis for the work that your organisation carries out for its customers.
- For the correct execution of the personnel and salary administration of your organisation.
- For evaluating (your) results and achievements.

For further information about the purposes of your organisation and the applicable legal bases, please contact your organisation.

How long does LEVIY retain my personal data?

The retention period(s) for the processing we carry out for your organisation has been agreed with your organisation. For more information about this, please contact them.

4 Involved as a customer of LEVIY

In this situation, LEVIY is the Controller.

As a customer of LEVIY, we process personal data for various purposes. The purposes, personal data involved and legal grounds are shown below.

Purpose:	Financial administration
Data:	Company name, billing address, bank details (name of bank/IBAN/BIC), outstanding balance
Legal ground:	Statutory obligation
Retention period:	7 years

Purpose: **Provision of the service itself**
Data: Name and address particulars, email address, file data, financial data, data necessary to provide the service, data generated during the course of the service
Legal ground: Performance of the agreement
Retention period: As long as necessary for this purpose

Purpose: **Handling complaints**
Data: Name and address particulars, email address, file data, financial data, data necessary to provide the service, data generated during the course of the service
Legal ground: Performance of the agreement
Retention period: As long as necessary for this purpose

Purpose: **Invoicing**
Data: Name and address particulars, email address, file data, financial data, data necessary to provide the service, data generated during the course of the service
Legal ground: Performance of the agreement
Retention period: 7 years

Purpose: **CRM**
Data: Name, email address, location, order history, social media data, phone number, agreements, profile picture
Legal ground: Legitimate interest
Interest concerned: Commercial Interest
Retention period: As long as necessary for this purpose

Purpose: **Newsletter**
(e.g., for marketing purposes)
Data: Name and address particulars, email address, telephone number
Legal ground: Legitimate interest
Interest concerned: Commercial Interest
Retention period: As long as necessary for this purpose

Purpose: **Technical newsletter**
(to inform you about changes to our services and products)
Data: Name and address particulars, email address, telephone number
Legal ground: Performance of the agreement
Retention period: As long as necessary for this purpose

Purpose: **Verification and support**
(to be able to approach you if this is necessary to perform our services)
Data: Name and address particulars, email address, telephone number
Legal ground: Consent
Retention period: As long as necessary for this purpose

5 Involved as an job applicant at LEVIY

This applies when you send us a job application letter, possibly with CV.
In this situation, LEVIY is the Controller.

Our purpose is to compare several candidates with each other and to make a choice based on your personal data. We share your information with several employees at LEVIY.

What personal data do we do process?

- Name, address, place of residence
- Date of birth
- Email address and phone number
- Social media data
- CV

The legal ground for this is a legitimate interest, namely the recruitment of personnel.

How long does LEVIY retain my personal data?

LEVIY will retain the personal data until 4 weeks after the end of the application procedure.

6 General information

With whom does LEVIY share personal data?

If you are a user of our digital solution, LEVIY, as Processor, will share your personal data with your organisation. The latter can share your personal data with third parties via LEVIY. For more information about this, please contact your organisation.

In consultation with your organisation, we enter into a processor or sub-processor agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality of your data.

LEVIY may use external consultants. These consultants are subject to the same duty of confidentiality as our own employees.

What about transfers to third countries or international organisations?

For technical and operational reasons for instance, it may be necessary for your personal data to be passed on to a company affiliated with LEVIY outside the European Economic Area. Because the privacy protection regulations there may not offer the same protection as within the European Economic Area, LEVIY will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible.

What are cookies and how does LEVIY use them?

A cookie is a small text file that is stored on your computer, tablet or smartphone on your first visit to this website.

The cookies LEVIY uses are necessary for the technical operation of the website and for your convenience. They make sure that the website works properly, for example by remembering your preferred settings. It also enables us to optimise our website. LEVIY only uses technical, functional and analytical cookies that do not infringe your privacy.

You can unsubscribe from cookies by setting your Internet browser so that it no longer stores cookies. In addition, you can also delete all information previously stored in the settings of your browser.

What are my rights?

Under the European General Data Protection Regulation, you have a number of rights with regard to your data and the processing thereof.

To exercise your rights regarding personal data that we process on behalf of your organisation, you must enquire with your organisation about the conditions that such a request must meet.

To exercise your rights regarding personal data for which we are a Controller, please send an email to info@leviy.com.

This concerns the rights below.

Access

You can always access your personal data and, if necessary, change it in your account. If you want to see the personal data that have been recorded about you at LEVIY, you can make a request for access at your organisation if LEVIY is a Processor or at LEVIY if we are a Controller.

Rectification

If, as a result of a request for access, you want to rectify the personal data you have seen, but cannot change it in your account yourself, you can submit a request to your organisation or LEVIY. You can request that your organisation or LEVIY changes, corrects, completes, deletes or blocks your data.

Restriction of processing

You also have the right, subject to certain conditions, to request your organisation or LEVIY to restrict the processing of your personal data.

Right of objection

If a certain processing takes place on the basis of the 'legitimate interest' of LEVIY or a third party, you have the right to object to that processing.

Data portability

You have the right to obtain your personal data from your organisation or LEVIY. LEVIY will provide these in a structured and common form, which can be easily opened in other common digital systems.

Withdrawal of consent

In all cases where your consent is the legal ground for a certain data processing, you have the right to withdraw that consent. This has no consequences for the past, but it does mean that we will no longer be able to process these data. It is possible that LEVIY will no longer be able to provide you with certain services as a result.

Response by LEVIY

A request can be sent to info@leviy.com. LEVIY will comply with your request as soon as possible and in any case no later than one (1) month after we have received the request. If LEVIY rejects your request, we will explain why in our reply.

Can this Privacy Statement be amended?

This Privacy Statement is subject to change. We therefore advise you to regularly read the Privacy Statement for any changes.

Where can I turn to for complaints and questions?

If you have any questions about this Privacy Statement and the way in which LEVIY uses your data, please send an email to info@leviy.com. If you have a complaint about the way LEVIY processes your data, you can also send an email to this address. In addition, you can always contact the competent national supervisory authority on privacy protection. In the Netherlands, this is the Dutch Data Protection Authority.