

Privacy statement Graydon for prospects, clients, website visitors and suppliers

Purpose and scope

Because Graydon Nederland B.V., Graydon Holding N.V. and OpenCompanies B.V. process personal data, based on the information obligation imposed in the GDPR, it is obliged to draw up a privacy statement. This document provides data subjects (the customers and suppliers and website users whose data Graydon processes) insight into what Graydon does with personal data, for what purpose and in what way. Information about data processing must be transparent and understandable.

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Introduction

This is the Privacy Statement of Graydon Nederland B.V, Graydon Holding N.V. and OpenCompanies B.V. (trading as GraydonGo) (hereinafter: '**Graydon**' or 'we'). This privacy statement is applicable to the processing referenced in this statement as well as all Graydon services.

This privacy statement is applicable to the following categories of stakeholders:

- Prospects
- Clients
- Partners
- Website visitors
- Visitors of our office buildings
- Suppliers
- Job applicants

This Privacy Statement offers you clarification about how we process and handle your personal data.

Graydon: we stand for doing business safely

As you may know, Graydon is a business information specialist. We have over 130 years of experience with the supply of reliable business information to companies and governments. Graydon believes that transparency strengthens trust between business partners. If organisations have a clear picture of the opportunities available and the risks they may face, collaboration will arise, agreements will be made, and ideas will become reality.

Our mission is to filter large quantities of data that is available from various sources, in order to obtain and offer useful, but more importantly reliable, business information about all companies in the Netherlands, for the purpose of generating more trust between trade partners and contributing to efficient trade and economic traffic. Data about you and your company is also an important part of this. Based on the information from various sources, we generate valuable financial, and commercial business insights, which enable our clients to take even better business decisions.

This Privacy Statement was last updated on: [April 22, 2022].

1. Who is the data controller for your personal data?

Graydon is the controller with regard to your personal data. This means that we have certain legal duties and responsibilities for our processing activities. This Privacy Statement is to inform you about how we fulfil our duties and responsibilities.

2. What personal data does Graydon collect?

Graydon processes information, including personal data of the parties mentioned in the Introduction. Curious about which personal data Graydon processes about you?

Please check our table at the bottom of this document for further clarification.

3. How does Graydon obtain your personal data?

Graydon collects personal data in a number of different ways. We obtain personal data when offering and performing our services, when you become our supplier (for example, we process contracts and invoices which may contain your contact details), or when you otherwise communicate with us. Furthermore, personal data may be collected when you visit our website, register for an event, subscribe to our newsletter, or apply for a job with us.

4. For what purposes and on what legal basis does Graydon process personal data?

Graydon processes information for various purposes, such as:

- *Client support*

We use your personal data to provide our services to you and to optimise those services (for example when you have questions or specific points of attention that require further elaboration).

Legal basis: being able to perform or implement our agreement with you as a client.

- *Marketing and sales activities*

Graydon likes to inform prospects and clients about offers, innovations and other relevant content relevant to the professional field with regard to our services, in accordance with the regulations that apply to this, or because you have given us your consent for this. We can do this by telephone, email, newsletters, or in person. Of course, you always retain the right to revoke your consent at any time.

Legal basis: your consent or our legitimate interest to inform you about our services.

- *Managing our websites*

We process your personal data on our websites to improve the experience for visitors of our websites as well as our services.

Legal basis: our legitimate interest to improve the quality of our services, including our websites.

- *Reporting, analytical and scientific purposes*

Your personal data may be used for reporting and analysis purposes to improve our services and to be able to align them to the needs of our clients.

For this purpose, you may receive an invitation to participate in a client panel. Of course, you are always free to accept such invitations and such invitations will include an option to opt out of invitations for future studies.

Your anonymised data can also be used by our research department for benchmarking purposes and statistical analyses.

Legal basis: our legitimate interest to improve our services, for example through gaining insight into the geographical distribution of our clients, and to be able to continually safeguard the quality of our services.

- *Administrative purposes*

In our administration, for the purpose of for example the correct performance of invoicing, the aforementioned personal data will be updated to keep it as current as possible. In addition, personal data will be processed so that your agreement with us (as a client or supplier) can be managed as best as possible and to optimise internal processes for the performance of your agreement.

Legal basis: our legitimate interest to keep our administration accurate and up to date.

- *Complaint and dispute resolution*

Despite our efforts to offer you the best possible service, it can happen that you are dissatisfied about our services and wish to file a complaint. In that event, the personal data we have about you may be used to achieve the best possible resolution of your complaint.

Legal basis: our legitimate interest to optimise our services, including the processing of complaints.

- *Recruitment and selection*

For the recruitment and selection of new employees, we process personal data for potential candidates to assess the suitability of a candidate and to comply with applicable laws and regulations.

If you are a candidate for an internal vacancy at our company, we will temporarily include your data in our database to support the recruitment and selection process.

Legal basis: the performance of the agreement (precontractual agreements) with the applicant and the necessity to comply with legal requirements.

- *Camera surveillance*

Camera surveillance and video recording is used throughout our building, as a security measure for the safety of people and property. Notice of the use of camera surveillance is given by way of stickers and signs on the terrain and in the building. The use of these cameras does is not a stand-alone measure, it is part of a range of technical, structural and organisational security tools and procedures.

Legal basis: our legitimate interest to protect our employees, visitors and property.

Please check our table at the bottom of this document for further clarification.

5. Does Graydon share personal data with other parties?

When you use our services or websites, some personal data may be shared with third parties.

Clients, partners, suppliers, website users:

- Affiliated enterprises, to the extent that such is legally required and/or necessary for the performance of the agreement.
- External service providers (consultants, but also parties who supply external software/tools)
- Legal professionals (in the event of a dispute) such as debt collection agencies, bailiffs and/or lawyers

Applicants:

- References provided in the cover letter or CV, to verify the competencies of an applicant]

6. Is any personal data being transferred to countries outside of the European Economic Area?

Graydon only provides personal data to a few clients outside of the European Economic Area (hereinafter: 'EEA') if, according to the European Commission, the country has an adequate level of data protection in place or if additional precautions have been implemented ([standard contract terms](#)) with these parties to ensure that your personal data is being protected in accordance with the GDPR standards.

7. How does Graydon protect your personal data?

The protection of the privacy and confidentiality of your personal data is very important to Graydon, as such Graydon ensures adequate technical and organisational measures are in place to secure personal data against very form of illegitimate processing, loss, and misuse.

Graydon works with a quality management system which guarantees a consistent service level that complies with the client's requirements and applicable law and regulations.

ISO 9001

Graydon Nederland B.V. was one of the first business information offices to be accredited with the ISO 9001 certificate. This shows that Graydon Nederland B.V. has implemented a quality management system that guarantees a consistent service level that complies with the client's requirements and applicable legislation and regulations.

ISO 9001 is an international standard for quality management for the assessment of service orientation, transparency, and training and coaching of employees. Graydon Nederland B.V. is a clear example of a company where a culture of continuous quality improvement is part of the core of the organisation. The extensive audits that have been performed, show that Graydon Nederland B.V. scores above average in all areas.

ISO 27001

Graydon strives for continuous quality improvement in its organisation. Graydon strives to be a market leader in this area. Therefore, Graydon has a strong focus on creating awareness and providing training to all of its employees. Graydon has implemented an active ICT security policy and Graydon Nederland B.V. is ISO 27001 certified. Moreover, Graydon has appointed a Security Manager for the entire Graydon Group who is tasked with ensuring that the security policy is complies with and who reports about the quality of the implementation.

8. How long does Graydon store your personal data?

Graydon stores your personal data no longer than necessary for fulfilling the purposes set out in this Privacy Statement, unless Graydon is required to retain your personal data to comply with legal requirements imposed on Graydon.

To ensure that your personal data is not stored any longer than necessary for the purposes set out in this statement, Graydon maintains a strict retention policy.

However, it can happen that we need to keep your personal data for longer, because it is required for compliance with a legal requirement imposed on us. Where our accountancy and bookkeeping are concerned, for example, we are requirement to retain invoices for a period of at least 7 years from the end of a financial year. If there is a dispute (to be anticipated) or a (legal) procedure, we are also entitled to retain your personal data for a longer period of time. Data concerning an applicant is retained for a maximum of 4 weeks after the end of the application procedure, unless you give your consent for us to retain the information for 1 year. If you would like further clarification about the retention periods applied by Graydon, please contact us.

9. What rights do you have with regard to your personal data?

As a data subject, you have several rights, which you can exercise within the framework of our processing of your data:

- **right of access:** you can ask Graydon to provide you with the personal data that is being stored by Graydon;

- **right of correction and right of removal:** if the information contains errors, is incomplete, or is not relevant for the purpose for which it is processed, or otherwise conflicts with the legal requirement, you can request that Graydon corrects, supplements, or removes that personal data;
- **right of limitation of processing:** to limit the processing of your personal data.
- **right of objection:** objecting against the processing of your personal data; when your personal data is being used for direct marketing, you may object at any time against that processing. You also have the right to object against profiling.
- **right of transferability of data:** the right to have your personal data transferred to another supplier that provides the same service. Because other suppliers make use of the same public sources, Graydon will not transfer that data.]

Graydon makes every effort to ensure that your personal data is correct and up to date. If you wish to exercise your rights, you can submit a request with motivation of your interests to Graydon. You can send your request to Graydon: via e-mail: avg@graydon.nl or by post to: Graydon Nederland BV, f.a.o.: Service, Postbus 12525, 1100 AM in Amsterdam. For us to be able to identify you, we kindly request that you include a copy of your identity document. You may redact your BSN (NINo) and picture on that copy. We will respond to your request within one month.

More information about editing the copy of your identity document in such a way that it is safe to post can be found on the [website of the central government](#).

10. Filing a complaint with the Autoriteit Persoonsgegevens

Your contentment is important to us. But even when we make every effort to achieve this, you may be dissatisfied. You can file a claim with the Dutch data protection authority, the Autoriteit Persoonsgegevens, if your complaint concerns the protection of your personal data. You can do this via [this link](#).

11. Cookies

The Graydon website uses cookies. For more information, please refer to our [Cookie Statement](#).

12. How can I contact Graydon?

Would you like to know more about Graydon's vision for privacy, or do you have a question or suggestion? You can contact us by e-mail: avg@graydon.nl, or by sending a letter to: Graydon Nederland BV, f.a.o.: Service, Postbus 12525, 1100 AM in Amsterdam.

This Privacy Statement may be updated from time to time. Therefore, we recommend that you regularly consult our Privacy Statement, to ensure you are informed of any changes.

13. Data Protection Officer

Graydon has appointed a designated Data Protection Officer (hereinafter: '**DPO**'). The DPO is tasked with ensuring Graydon's compliance with the privacy legislation and regulations and is the contact person for the Autoriteit Persoonsgegevens. If you want to contact the DPO, you can send an e-mail to: dpo@graydon.nl.

14. VVZBI Privacy Code of Conduct

Graydon is a member of the Association for business B2B information (Vereniging voor zakelijke B2B informatie, VVZBI). Together, we safeguard legal security in the financial traffic. As an association, we have a Privacy Code of Conduct, which we, as well as the other members, fully conform to. Please read the Privacy Code of Conduct [here](#).

Table

Graydon's data processing, purposes and legal bases

Name of the data process	What personal data is being processed?	For what purpose(s) is the data being processed?	What is the legal basis for the processing of this data?
<i>Client support</i>	<ul style="list-style-type: none"> • Your contact details: company name, email address, telephone number, name of contact person, function title, personal title; • Other data about your company, such as company registration (KvK) number, VAT number, bank account number, website, email address and other company and contact information; • communication: letters and email messages to and from contact persons; • order information: information about the service(s) to you as a client. 	<ul style="list-style-type: none"> • The delivery and optimisation of our services to you. 	Legal basis: being able to perform or implement our agreement with you as a client.
<i>Marketing and sales activities</i>	<ul style="list-style-type: none"> • Your contact details: company name, email address, telephone number, name of contact person, function title, personal title; 	<ul style="list-style-type: none"> • Informing clients about offers, innovations and other relevant (within the professional field) content with regard to our services. 	Legal basis: your consent or our legitimate interest to inform you about our services.

<p>Website administration</p>	<ul style="list-style-type: none"> • contact information (when registering for newsletter): forename, surname, email address, 'active in what industry?', 'function group'; • communication data: technical data of the equipment that is used for visiting the website, such as IP address (with privacy-friendly settings), MAC address and the software used; • technical data (depending on the selected cookie preferences): the surfing behaviour on our websites, including the duration and time of the visit on the websites. 	<ul style="list-style-type: none"> • Ensuring the proper functioning of our websites; • Improving the services and the experiences of visitors on our websites. 	<p>Legal basis: our legitimate interest to improve the quality of our services, including our websites.</p>
<p>Internal training purposes</p>	<ul style="list-style-type: none"> • Your contact details: company name, email address and/or telephone number, name of contact person, function title, personal title. • Recordings of telephone conversations with our customer service. 	<ul style="list-style-type: none"> • Improving our services. 	<p>Legal basis: our legitimate interest to improve the quality of our services.</p>

<p><i>Reporting, analytical and scientific purposes</i></p>	<ul style="list-style-type: none"> • Contact information (when registering for newsletter or participating in client panel): forename, surname, email address, 'active industry', 'function group'; • Anonymised data for statistical and research purposes 	<ul style="list-style-type: none"> • Improving our services; • Mapping the geographical distribution of our clients; • Benchmarking; • Statistical purposes. 	<p>Legal basis: our legitimate interest to improve our services, for example through gaining insight into the geographical distribution of our clients, and to be able to continually safeguard the quality of our services.</p>
<p><i>Administrative purposes</i></p>	<ul style="list-style-type: none"> • Your contact details: company name, email address, telephone number, name of contact person, function title, personal title; • Other data about your company, such as company registration (KvK) number, VAT number, bank account number, website, email address and other company and contact information; • communication: letters and email messages to and from contact persons; • order information: information about the service(s) to you as a client. 	<ul style="list-style-type: none"> • The performance of our agreement with you as a client or supplier; • The management of internal processes; • The compliance with applicable laws and regulations. 	<p>Legal basis: our legitimate interest to keep our administration accurate and up to date.</p>
<p><i>Complaint and dispute resolution</i></p>	<ul style="list-style-type: none"> • Your contact details: company name, email address and/or telephone number; function title, personal title, 	<ul style="list-style-type: none"> • The optimal handling of complaints • Improving our services; 	<p>Legal basis: our legitimate interest to optimise our services, including the processing of complaints.</p>

	<ul style="list-style-type: none"> • communication: letters and email messages to and from contact persons; • order information: information about the service(s) to you as a client. 	<ul style="list-style-type: none"> • The handling of a dispute or a legal procedure. 	
<i>Recruitment and selection</i>	<ul style="list-style-type: none"> • contact details: name, address, function title, personal title, telephone number, email address. If applicable: Company registration (KvK) number, VAT number, bank account number, website, email address and other company and contact information; • data that has been provided by the applicant, including date of birth, nationality, place of birth and gender, data concerning education and employment history and other data that is deemed relevant with a view to the fulfilment of the function; • other data of which processing is needed or required in connection with applicable laws and regulations. 	<ul style="list-style-type: none"> • The recruitment and selection of new employees; • The assessment of the suitability of a candidate; • The compliance with applicable laws and regulations. 	Legal basis: the performance of the agreement (precontractual agreements) with the applicant and the necessity to comply with legal requirements.
<i>Camera surveillance</i>	<ul style="list-style-type: none"> • Camera images of persons in and around the buildings of Graydon. 	<ul style="list-style-type: none"> • The securing of our employees, visitors and property. 	Legal basis: our legitimate interest to protect our employees, visitors and property.