

This Statement was last updated on 07-05-2019

In this Privacy Statement ('Statement'), you can find information about whether, how, and why Future Forward-Portstream B.V. and its group companies and subsidiaries including Future Forward-Portstream Software & Services B.V. and Future Forward DOO, Serbia ('FFWD', 'we', 'us' or 'our') collects and uses your personal data. This Statement applies to any personal information that is processed when you make use of our services, visit our events, visit our websites (including [www.futureforward.nl](http://www.futureforward.nl)) or otherwise interact with us.

The contact information for the main establishment of FFWD is Nicolaas Pieckstraat 12 (3232 BP) Brielle, the Netherlands, telephone +31 181 413 112. If you have any other questions or would like additional information, please send an email to us at [privacy@futureforward.nl](mailto:privacy@futureforward.nl).

When we process your personal data, we make sure this is done in compliance with the General Data Protection Regulation ('GDPR'), the Dutch GDPR Execution Act and the Dutch Telecommunications Act.

### **How does FFWD receive or collect your personal data?**

We will receive personal data from you over the course of providing our services to you, when you engage us as a client or otherwise contact us. Furthermore, your data is collected when you visit our website or apps, register for an event and subscribe to our newsletter.

### **For what purposes does FFWD process which personal data on what legal grounds?**

#### **Clients**

FFWD processes your personal data for the purpose of providing our services to you and to manage our relationship with you. The following personal data may be processed for this purpose:

- *Contact information:* Name, job title, telephone and fax number, Chamber of Commerce registration number, VAT number, internet website, e-mail address and other company information;
- *Communication:* Letters and E-mail messages with contact persons;
- *Assignment information:* Information on the services provided to our clients and information regarding the content of the matter.

The legal basis for this processing of personal data is that processing is necessary for the performance of our contractual relationship with you.

#### **Website users/visitors**

##### *(Direct) marketing*

FFWD processes personal data to provide you, our clients, prospects and relations with relevant information, such as newsletters, updates and invitations for events, for information and marketing purposes. The following personal data may be processed for this purpose:

*Contact information:* Name, gender, e-mail address, company name, (contact person of) clients, prospects and relations, IP address and webprofile.

The legal basis for this processing of personal data is the consent of the data subject involved and /or because processing is necessary for the performance of the contractual relationship with you, the client and /or that processing is necessary to fulfil our legitimate interest in building and maintaining relationships with you, clients, prospects and relations. Depending on the ground of processing (legitimate interest versus consent), you have the right to withdraw your consent at any time or have the right to object to the processing of your personal data for direct marketing purposes at any time. The withdrawal of your consent or exercise of your right of objection shall not affect the lawfulness of processing prior to such withdrawal or objection.

### *Cookies*

The website(s) of FFWD use(s) cookies. Two kinds of cookies are used:

- **Functional cookies:** these cookies are necessary to make a website function. FFWD uses functional cookies to facilitate navigation on the websites and to store specific user settings or user preferences, so as to optimize your use of the websites;
- **Analytical cookies:** FFWD uses Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/...>

### **When does FFWD share my personal data with third parties?**

When you use our services or websites, we may share (some of) your personal data with third parties (e.g. IT providers, communication service providers, etc.). When we share your personal data with third parties, processing personal data on our behalf (data processors), your information will still be protected by the terms of this Statement and processor agreements.

Our websites also contain links to third-party websites. If you follow these links, you will exit our website. This Statement does not apply to third-party websites. FFWD does not accept liability for the ways in which these third party websites use your personal data. You use these websites at your own risk. For more information on how these third parties treat your personal information, please check their respective privacy policies.

### **Where is your personal data processed?**

When processing your personal data for some of the purposes specified above, we may disclose the data to third parties located outside the European Economic Area ("EEA"). For such transfers, FFWD will take measures that provide an adequate level of protection for your rights and freedoms as a data subject, such as for instance model contractual clauses for data transfer approved by the European Commission. We may also transfer personal data to third parties who are certified under the EU-U.S. Privacy Shield Framework.

### **What security measures does FFWD take to protect my personal data?**

FFWD has taken appropriate technical and organizational measures to protect your personal data against accidental or unlawful processing, including by ensuring that:

- the confidentiality of your personal data is assured and the integrity and availability of your personal data will be maintained;
- personnel is trained in information security requirements;
- your personal data is protected against unauthorized access.

In the event of a breach of security FFWD will make any legally required disclosures concerning the breach and the confidentiality, or integrity of your personal data. This will be done without unreasonable delay in as far as it is consistent with any legitimate needs of law enforcement and any measures required to determine the scope of the breach and to safeguard the integrity of data. If you wish to have more information about the security measures to protect your personal data please contact us at [privacy@futureforward.nl](mailto:privacy@futureforward.nl).

### **How long does FFWD retain my personal data?**

Unless a specific retention period is mandated or permitted under applicable law, for example under fiscal law, FFWD will retain your personal information for the duration of time necessary to fulfil the purposes described in this Statement. This means that we may retain your personal data for a period of time following termination of your relationship with us. For taxation and company accounting purposes we will retain information for at least seven years. In case of disputes or claims, we may secure evidence and store data for a longer period. If you wish to have more information about the retention period of your personal data, feel free to contact us at [privacy@futureforward.nl](mailto:privacy@futureforward.nl).

### **What are your rights with regard to the personal data we process?**

You can exercise a number of rights in relation to your personal data. In each case, please use the contact details below to exercise any of your rights. We will ask you to provide us with a copy of your passport or other proof of your identity. We only ask you to provide a copy to prevent that others may have access to or exercise rights in respect of your personal data. Once we have checked your identity, we will delete the copy. Note that in many cases, your rights are not absolute and we may not be required to comply with your request.

#### *Right of access*

You are entitled to request a copy of the personal information we hold about you and to learn details about how we use it.

#### *Right to rectification*

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

#### *Right to erasure*

In certain circumstances, you have the right to ask us to erase your personal information, for example where personal data is no longer necessary for the original purpose or where you have withdrawn your consent. However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.

### *Right to restriction of processing*

In certain circumstances, you are entitled to ask us to (temporarily) stop using your personal data, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to process your data.

### *Right to data portability*

In certain circumstances, you have the right to ask that we transfer personal data that you have provided to us to a third party of your choice.

### *Right to object*

You have the right to object to processing which is based on our legitimate interests. Unless we have a compelling legitimate ground for the processing, we will no longer process the personal data on that basis when you file an objection. Note however, that we may not be able to provide certain services or benefits if we are unable to process the necessary personal data for that purpose.

### *Right to withdraw consent*

We may ask for your consent to process your personal data in specific cases. When we do this, you have the right to withdraw your consent at any time. We will stop the further processing from the moment of withdrawal of your consent. However, this does not affect the lawfulness of the processing before consent was withdrawn.

### **What is our policy for modifying this Statement?**

This Statement is effective as of the date first written above and replaces our previous Privacy Statement. We reserve the right to alter or otherwise make changes to this Statement. If we do make changes, we will notify you by posting the revised Statement on our website and notifying you through a banner. In case of amendments which may have serious impact on our clients and relations, we will inform them about the amendment via e-mail. All changes take effect as soon as the Statement is posted.

### **How can you reach us for questions or complaints?**

If you have any question or complaints about the processing of your personal data, please send an e-mail to us at [privacy@futureforward.nl](mailto:privacy@futureforward.nl). We will be happy to assist you. If you feel that your rights have been violated, you may also lodge a complaint with the Autoriteit Persoonsgegevens, the Dutch Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)). For more information about the protection of personal data, please consult the website of the [Autoriteit Persoonsgegevens](http://www.autoriteitpersoonsgegevens.nl).