

Privacy statement Fairbanks

This is the privacy statement of Fairbanks B.V. and 42on B.V., hereinafter jointly: “Fairbanks”. In this privacy statement we inform you about the processing of your personal data (hereinafter also “data”) by Fairbanks.

How does Fairbanks collect your data?

As part of our business activities, we collect personal data in various ways:

- Through our websites (such as fairbanks.nl, 42on.com, openstack.nl and fairbanksinternationalgroup.com) we collect certain data from website visitors via cookies. More information can be found in the cookie statement, which can also be found on this website.
- When you contact us, for example by email or through one of our websites.
- When we communicate with you as part of our business operations.

We receive the following types of data from other parties:

- Als wij via social media waar u ook een account heeft contact met elkaar hebben kunnen wij daarbij persoonsgegevens uitwisselen.
- From our online marketing and analytics service providers; we gain insight into the way our website is used, such as the number of visitors and moments of visits.
- From recruitment agencies; we receive information about potential candidates, such as their CV and profile information.
- By default, we take a knowledge assessment from applicants, who provides us with a report of the assessment. The agency providing the assessment is located in the United States.
- When you apply for a VOG, we receive (via you) the VOG from the Dutch government agency that issues the VOG.
- If we have contact with each other via social media where you also have an account, we can exchange personal data.

What does Fairbanks use your personal data for?

We use your personal data for the following purposes:

- To be able to communicate with you.
- To identify and address you appropriately.

- To find out about your suitability for an assignment or position with us.
- To be able to enter into and execute the agreement with you or the organization for which you work.
- To conduct our business activities.
- To be able to keep our (financial) administration and collect invoices.
- To be able to meet our legal obligations.
- To be able to communicate with customers and suppliers, such as with questions or complaints.
- To maintain a commercial relationship with our customers, by email or by post.
- To recognize the browser and / or device with which our websites are visited.
- To improve the user-friendliness of the website.
- For creating and analyzing visitor statistics.
- To maintain a customer relationship with you and the organization you work for.
- To assess whether we want to enter into an (employment or assignment) agreement with you.

On what legal bases is the use of your data based?

We use your data on the following legal grounds:

- Because we need the data to enter into and / or perform an agreement to which you are a party.
- Because we need the data to meet our legal obligations.
- Because we need the data for our legitimate interests, or those of others, these legitimate interests lie in the ability to conduct our business.
- In specific cases we can request permission to process certain data, you can always withdraw this permission.

Are you obliged to provide the data?

Yes, we ask you to provide some information, such as when you want to apply with us or offer your services to us. If you do not want to share this information, we cannot enter into the agreement with you because we need this information in order to enter into and execute the agreement with you and sometimes also to comply with legal obligations, such as the obligation to keep financial records.

With whom does Fairbank share your data?

We only use your data for ourselves. However, it may be necessary to transfer your information to others in the following cases:

We share the data with the following types of parties:

- **ICT companies.** We use a hosting company that stores and manages the data. This ICT company is located in the Netherlands and stores the data in the Netherlands.
- **Online marketing suppliers.** We share collected data through our websites and any other online channels with our online marketing suppliers. One of these suppliers is located in the US (see also the next section), the other suppliers are located in the Netherlands.
- **Banks.** When making payments, your data is shared with our bank and your bank. Our bank is located in the Netherlands.
- **Group companies.** We can exchange your data for the aforementioned purposes between group companies (Fairbanks B.V. and 42on B.V.).
- **Accountant.** We must pass on the information on invoices to our accountant. Our accountant is located in the Netherlands.
- **Debt collection agency.** We can transfer a due and payable claim (invoice amount) to a collection agency. In doing so, we will only pass on the information that is necessary for the execution of the collection work. The collection agency is located in the Netherlands or in the country where you live or are established.
- **Overheidsinstanties.** We may be required to share information with government agencies, such as the Tax Authorities.

Is your data transferred outside the European Economic Area?

Yes, your data will be transferred outside the EEA in the following cases:

- To Google, Inc., for the purpose of Google Analytics (more information about this can be found in the Fairbanks cookie statement).
- We use online applications such as Slack, Zoom and Jira (Atlassian, Inc.) where your data may appear in the context of our business activities. This data is also stored outside the EEA.
- When transferring outside the EEA, we provide appropriate safeguards for transfer to these parties, such as concluding a European Union Model Contract.
- With regard to Office 365, we have agreed with Microsoft that they will store the data in the EEA.

How long does Fairbanks keep your data?

We do not store your data longer than is necessary for the purposes for which we process it.

We use the following retention periods:

Type of data	Retention period
Data in our CRM system (name, address data, email address, telephone number).	Up to 5 years after the last transaction.
Invoice data, transaction data and other financial data.	7 years based on the legal tax retention obligation.
Correspondence.	As a starting point 5 years, unless certain correspondence has to be kept longer because of evidence.
Details of rejected applicants.	Up to 4 weeks after completion of the application procedure or 1 year, with your permission.
Informatie die via cookies wordt verzameld.	Information collected through cookies.

What rights do you have?

Under the law you have at least the following rights with regard to your personal data:

- Request a copy and access to your data.
- Receive information about the processing of your data.
- Have incorrect data corrected.
- To have incomplete data supplemented, given the purposes for which it is processed.
- Have your data deleted.
- Have your data "restricted".
- Object to the use (processing) of your data.
- If you have given permission for the use of your data, withdraw that permission. The revocation then applies to future use of your data.
- If you have provided the data yourself or when data has been created by you (for example, based on your use of our service), and you have given permission for this, whether the data is necessary for the execution of the agreement, and if the data is electronic are processed: to get your data in a structured and common format in machine-readable form and, if technically possible, to have it transferred to another party in this way.

- To file a complaint with the competent privacy supervisor (this can be the supervisor in the country of your habitual residence, where you carry out your work or where (alleged) privacy laws are infringed), in the Netherlands this is the 'Personal Data Authority' or 'Autoriteit Persoonsgegevens'.

To exercise your rights, please contact us using the contact details listed under "What if you have questions?"

In some cases we may have the right to refuse your request. In that case we will explain why we refuse the request. We may no longer be able to perform the agreement with you if we do not have certain information about you, we will explain this.

If we use your data for direct marketing purposes and you ask us to stop using it, we will do so. Electronic commercial messages always include an unsubscribe button so that you can unsubscribe from receiving those messages.

What if you have questions?

If you have any questions about the use of your data or about this privacy statement, please contact:

Fairbanks B.V.
Stationsplein 62
Baarn, 3743 KM
The Netherlands
0031-885-454-900

You can also contact our privacy contact directly via the email address:
privacy@fairbanks.nl.

This privacy statement was published on 05-08-2020. We reserve the right to amend this privacy statement. If it concerns an important change, we will inform you, for example by sending you an email message or placing a pop-up on the website.