# PRIVACY STATEMENT

Impulssum B.V. and all associated enterprises ("Impulssum") takes the careful handling of your ("Data Subject") personal data very seriously. It will, therefore, treat and protect Personal data with the greatest possible care. In connection hereto, Impulssum shall comply with the applicable laws and regulations at all times.

Data Subject must read this privacy statement ("Privacy Statement") carefully. Impulssum processes personal data of Data Subject because Data Subject uses the services of Impulssum ("Services") and/or because Data Subject has provided these data to Impulssum and/or because of an agreement ("Agreement") concluded between Data Subject and Impulssum. The Services include the following: visiting and/or using the website of Impulssum www.Impulssum.com ("Website") and/or commissioning Impulssum as contractor to perform work. This Privacy Statement provides insight in the data that Impulssum processes and for what purpose Impulssum processes these data. Moreover, it explains what rights a Data Subject has with regard to the processing of its data. By visiting the Website and/or using the Services and/or entering into an Agreement with Impulssum, Data Subject agrees with this Privacy Statement. By agreeing with the Privacy Statement, Data Subject gives its consent to Impulssum for the use and processing of personal data:

# 1. Data that Impulssum processes and the purpose of processing

Within the framework of the performance of the Services and/or within the framework of the execution of the Agreement Impulssum processes personal data. Below, an overview has been included of the purposes for which Impulssum processes personal data. Each time, it is stated what data Impulssum uses for that specific purpose and what the legal basis is that allows for these data to be processed. This overview has been grouped according to type of data flow.

# SERVICES, CLIENT MANAGEMENT, AND FINANCIAL ADMINISTRATION

Purpose: Financial administration

Data: (Company) name, Company information, Invoice address, Bank information (Name

Bank/IBAN/BIC)

Basis: Legal obligation

Purpose: Invoicing

Data: Contact details, Email address, VAT number, Company information

Basis: Execution of the Agreement and/or Consent

Purpose: CRM

Data: Contact details, Email address, Location, Telephone number, Profile photo

Basis: Legitimate interest and/or Execution of the Agreement and/or Consent

Purpose: Application/hiring Freelancers

Data: Contact details, Email address, Location, Telephone number, Profile photo, Resume

Basis: Legitimate interest and/or Execution of the Agreement and/or Consent

# **MARKETING**

Purpose: Direct marketing

Data: Contact details, Email address, Telephone number, Clicking behaviour, Browsing behaviour,

Interest in a product, Social media account

Basis: Legitimate interest and/or Consent

Purpose: Newsletter

Data: Contact details, Email address, Telephone number, Clicking behaviour, Browsing behaviour,

Interest in a product, Social media account

Basis: Legitimate interest and/or Execution of the Agreement and/or Consent

Purpose: Social marketing

Data: Contact details, Email address, Telephone number, Clicking behaviour, Browsing behaviour

Interest in a product, Social media account

Basis: Legitimate interest and/or Consent

#### **WEBSITE**

Purpose: Website analytics

Data: Browsing and clicking behaviour on Website, Location, IP address, browser specifications,

how Data Subject arrived at Website (e.g. direct, through a link or search engine), pages viewed, search terms used, et cetera, and the other data listed in the cookie notification on

the Website.

Basis: Legitimate interest and/or Consent

Purpose: Processing requests made through the contact form

Data: Contact details, Email address, Telephone number

Basis: Execution of the Agreement and/or Consent

#### 2. Data retention period

Impulssum shall retain the personal data for as long as this is necessary for the purpose for which they have been collected and/or during the period that the Data Subject uses the Services and the personal data are necessary for these Services and/or during the period of the Agreement and as long as the personal data are necessary for the execution of the Agreement. When a data processing purpose has been fulfilled, Impulssum will check whether it is obliged to retain the personal data by virtue of a legal obligation or in order to settle a claim or controversy.

# 3. Providing personal data to third parties

Impulssum will treat the personal data of Data Subject discreetly, and will only process these personal data for the purposes stated in this Privacy Statement. Impulssum will not provide the personal data of Data Subject to any third parties, unless Data Subject has given its consent to do so or if this is necessary for the execution of the Agreement or if this is necessary in order to perform all the functions and/or all the Services that Data Subject has given its consent for. All third parties employed by Impulssum will be bound to the conditions that apply on the basis of this Privacy Statement. Impulssum, moreover, is entitled to provide the personal data of Data Subject to a third party, if Impulssum is required to do so by national or international laws and regulations.

Moreover, Impulssum is entitled to transfer the personal data of Data Subject to third parties in the case of a merger, an acquisition, a reorganisation, sale of business units, or bankruptcy of Impulssum. Should this be required by applicable law, Impulssum will in this case ask Data Subject for its prior consent.

### 4. Use of cookies

Impulssum uses cookies on its website. By clicking on "OK" in the cookie notification on the Website, or by continuing to use the Website, Data Subject gives its consent to place cookies. Cookies are small bits of (textual) information that are sent to the browser when visiting the Website, and are consequently stored in the memory of the computer, laptop, tablet, mobile phone, or other device of Data Subject (hereafter referred to as "Device") and similar techniques with which information is collected. The cookie

notification on the Website specifies in more detail what cookies are used on the Website.

# 5. Modifying cookie settings or removing cookies

If Data Subject does not want Impulssum to place cookies on its Device, Data Subject can refuse the use of cookies via its browser's settings or options. Data Subject must change the settings individually for each browser and each Device. Note: it may be possible that after changing the cookie settings, some parts of the Website can no longer be used (correctly). When Impulssum has placed cookies, Data Subject can also remove these. How this is done, varies from one browser to another. Data Subject should - if necessary - consult the browser's help function. Data Subject may find more information about cookies on the websites of *Cookierecht* and the Dutch Consumer Association.

### 6. Security

Impulssum does its utmost to protect the data of Data Subject. To this end, Impulssum uses technical and organisational precautions to protect the personal data that Impulssum manages from manipulation, loss, destruction, and access by unauthorised persons. These safety precautions are improved continuously in line with technological developments. Moreover, the Website is continuously updated with the latest security updates.

The Website may contain links to external websites that are managed by other companies. Impulssum cannot offer any guarantees concerning the privacy policy of these external websites, and is not responsible for these websites. Impulssum advises Data Subject to read the privacy statements of these external websites carefully.

# 7. Rights Data Subject

With regard to the personal data that Impulssum collects and processes, Data Subject is at all times entitled to the following:

#### Access to personal data:

Data Subject can file a request with Impulssum to access the personal data of Data Subject that Impulssum has collected and/or processed;

#### Removal of personal data:

Data Subject can file a request with Impulssum to partly or completely remove or delete the personal data of Data Subject that Impulssum has collected and/or processed;

# Rectification and complementation of personal data:

Data Subject can file a request with Impulssum to modify, update, or correct the personal data of Data Subject that Impulssum has collected and/or processed if these data are incorrect or incomplete; Restriction of processing personal data:

Data Subject can file a request with Impulssum to restrict the processing of the personal data of Data Subject that Impulssum has collected and/or processed if these data are incorrect and/or the processing is illegal and/or the data are no longer required for the purpose that they have been collected for and/or Data Subject has objected to the processing of its personal data.

# Personal data data portability:

Data Subject can file a request with Impulssum to receive a copy of an overview of the personal data of Data Subject that Impulssum has collected and/or processed in a format in common use;

# Objection personal data:

Data Subject can file a request with Impulssum to cease collecting and/or processing (part of) its personal data and/or restrict processing, and Data Subject can file an objection with Impulssum at any time to the processing of its personal data.

Data Subject must send any of the above-mentioned requests to info@impulssum.com stating "Privacy Request". Impulssum will reply to the Privacy Request within four weeks. Impulssum is entitled to charge a reasonable compensation for taking into consideration such a Privacy Request. Impulssum will only take a Privacy Request into consideration if it is certain that the person who has filed the request actually is the Data Subject. Impulssum is entitled to dismiss the Privacy Request of Data Subject in certain cases. Impulssum can only dismiss a Privacy Request if it can provide a valid reason.

#### 8. Amendments

Impulssum reserves the right to modify the Privacy Statement. Data Subject can find the most current version of the Privacy Statement on the Website at all times.

# 9. Translation

This Privacy Statement has been drawn up in Dutch and in English. In case of discrepancies between these two versions, the Dutch version will prevail.

# 10. Complaints or questions

In the case of complaints or questions about this Privacy Statement, or about the processing of its personal data, Data Subject can contact Impulssum by sending an email to info@impulssum.com. Please remember to state that the email is about the Privacy Statement. Moreover, Data Subject can also always contact the authorised national regulator dealing with privacy protection. In the Netherlands, this is the Dutch Data Protection Authority.

#### **Date**

This Privacy Statement was last amended on 21 January 2025.

# **Cookie Policy**

We use cookies on this website, and we believe it's important to inform you clearly and transparently about how we use them, what types of cookies we place, and what your options are to manage or refuse them.

#### 1. What Are Cookies?

Cookies are small text files that are stored on your computer, smartphone, or tablet when you visit a website. These files record information about your browsing behavior and preferences. On your next visit, this information can be sent back to our servers or to the relevant third party to remember your choices, improve performance, or personalize your experience.

Cookies can be placed by the website itself (first-party cookies) or by third parties whose services we use (third-party cookies). They can be temporary (session cookies) or remain stored on your device for longer (persistent cookies).

### 2. Why We Use Cookies

We use cookies for different purposes:

#### a. Functional Cookies

These are necessary for the proper functioning of our website. They help make the website usable by enabling basic functions like page navigation and access to secure areas of the site.

#### b. Analytical Cookies

These cookies help us understand how visitors use our website, which pages are most popular, and how users navigate through the site. The insights we gain from this data allow us to improve the website's performance and user experience.

### c. Marketing and Tracking Cookies

These cookies allow us to show personalized advertisements and content across other websites based on your browsing behavior. They may also limit the number of times you see a particular ad and help us measure the effectiveness of campaigns.

#### 3. What Information Do Cookies Collect?

Depending on the type of cookie, we may collect the following data through cookies:

- Your IP address
- Browser type and version
- Operating system and device type
- Pages visited and time spent
- The website you came from
- Your cookie preferences
- Unique identifiers (for analytics or targeting)

This information is used only to improve our website, understand visitor preferences, or display more relevant content.

# 4. Can You Refuse or Manage Cookies?

Yes, absolutely. On your first visit to our website, you were presented with a cookie banner asking for your preferences. You can change these preferences at any time. Additionally, you can manage or block cookies using your browser settings. Most browsers allow you to:

- Accept all cookies
- Block all cookies
- Delete existing cookies
- Receive a warning before a cookie is placed