

UBUTLER PRIVACY POLICY

All uButler entites (“uButler, we, us, our”) process personal data from service users and from visitors to our website (“you, your”) . We are committed to protecting your privacy and we consider preserving the confidentiality of your personal data as one of our main objectives. This privacy policy explains what personal data we process, the purposes and legal basis of our processing activities, and how the processing activities are carried out. It also explains your rights under the applicable data protection laws, including the European Union’s General Data Protection Regulation (“GDPR”).

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1. Important terms used in this privacy policy

- 1.1 “You” - The user of the uButler Service via the uButler application and web platform, and the visitor of the uButler website.
- 1.2 “Personal data” - Any information relating to an identified or identifiable natural person.
- 1.3 “Processing” - Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 1.3 “Service” - The complete uButler service that is mainly chat-based via the uButler app or web chat. Other forms of communication may include email, video-calls or surveys.
- 1.4 “GDPR” - The General Data Protection Regulation (Regulation 2016/679), a European Union regulation which lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data.
- 1.5 For the purpose of this privacy policy, all the terms above and others in this policy such as “Data Controller”, “Data Subject”, and “Processor” shall have the same meanings as are assigned to them in the GDPR.

2. Data controller and Privacy officer

The **data controller** responsible for the data processing is:

uButler B.V.
Postjeskade 23H
1058 DE Amsterdam
Nederland (Netherlands)
Netherlands Chamber of Commerce registration number: 65327144

uButler has appointed a **Privacy Officer** who is freely contactable for any information relating to the processing of your personal data by uButler at the following e-mail address:

uButler Privacy Officer

E-mail address: privacy@ubutler.nl

3. What types of personal data we collect

3.1 When you create an account with us to use our services and during the provision of our service, we may collect and process the following personal data:

- **Contact details:** name, phone number, email address, postal address
- **Identity information:** date of birth, gender, country of residence, nationality, marital status, BSN (Dutch Citizen service number) and V-number (Dutch Immigration Service registration number), government issued documents (e.g. national IDs, driver's licences and passports)
- **Financial information**
- **Employment information**
- **Personal preferences**
- **Education background**
- **Device and usage information:** user operating system and version, app version that is used, cookie identifiers

3.2 We may collect and process the following sensitive data: information revealing racial or ethnic origin, health related data, and sexual orientation.

3.3 We may automatically collect and process information as you navigate our websites and use our services.

4. How we obtain personal data

4.1 **Information you provide us:** We collect personal data from you when you request customer or technical support, fill-out preferences, or evaluate the Service. We also collect the contents of messages or attachments that you may send to us, as well as other information you choose to provide in order to offer our Service.

4.2 **Information your employer provides us:** We receive your personal data from your employer such as identity information and employment information in order to initiate your service period.

4.3 **Information we collect automatically:** We automatically collect online identification information from you when you use our application or online portal.

5. How and why we use your personal data

5.1 We process data that is necessary to **perform our contract** for provision of our Service. For this purpose, we do the following:

- We communicate with your employer about your use of our Service, for example through a client portal, personalized status reports, and updates on payments facilitated by your employer.
- We ensure that content from our Service is presented in the most effective manner for you, your computer, tablet and mobile device.
- We transfer payment information to third-party service providers that process your payments.

5.2 We process data to pursue **our legitimate interests** to provide you and your employer information and our Service in the best way possible. For this, we do the following:

- We introduce you to our Service;
- We chat with you in the course of our Service;
- We communicate with you about changes in our Service and updates on your transactions;

- We tailor our Service to your needs, likings and interests by measuring interest and engagement in our Service, including analysing your usage of the Service;
- We evaluate and analyse your experience and the quality of our Service using data and analytical tools, and use this information to develop new products and improve the quality our Service;
- We maintain the functionality and security of our network and IT systems, we resolve any bugs in our system.
- We inform our Clients about incidents that may happen during the use of our service.

5.3 We process data to **meet our obligations under the law**. This primarily involves financial data and information that we need to meet our accountability obligations under the GDPR, fiscal and criminal laws.

5.4 We process the **sensitive data** we receive from you to provide our Service **only based on your consent**, which you can withdraw any time.

6. With whom we share your personal data

6.1 In order to operate our Service, we may share the personal data we collect about you with our **third-party service providers**. We conclude data processing agreements with our third-party service providers which guarantee that **they also provide sufficient guarantees to protect your personal data** and act in a GDPR compliant manner.

6.2 Below is the list of our third-party service providers and how we use their services:

<i>Name</i>	<i>Purpose</i>	<i>Location</i>
Airtable	Low code application data source	US
Amazon Web Services (AWS)	Hosting and storage systems provider	Ireland
Auth0	Secure access to data	Germany
Calendly	Automation of scheduling processes	US
Cloudflare	Content delivery network and security services	US
G-Suite	Cloud computing and storage services	Ireland
Mailgun	Tracking transactional and marketing messages	Germany and Belgium
Messagebird	Authentication	The Netherlands, Belgium, the UK, Germany
Mollie	Processing of payments through iDeal	The Netherlands
MongoDB	Real-time logging services	Germany
Payhawk	Processing of payments for purchases done within our Service	Ireland

Pipedrive	Customer Relationship Management	Germany
Power Bi	Data visualisation	The Netherlands
Slack	Manage daily operations and collaboration within our departments	Ireland
Stacker	Build internal low-code application	US
Stripe Payments Europe, Limited (SPEL)	Process credit card payments	US
Typeform	Receive information from our users	US

7. International Transfers

7.1 The personal data we collect and process about you may be transferred, processed, and stored outside the European Economic Area (EEA). Whenever your data is **transferred outside EEA**, we ensure there is a similar degree of protection with EU standards by implementing one of the following safeguards:

7.1.1 We will only transfer your personal data to countries that have been deemed to provide an **adequate level of protection** for personal data by the European Commission.

7.1.2 Where we use service providers based in the United States, we ensure appropriate safeguards are in place to guarantee the continued protection of your personal data by signing **the Standard Contractual Clauses (SCCs)** approved by the European Commission, which **give personal data an equivalent protection it has in Europe**.

8. Analytics and cookies

8.1 We optimise our Service for you and for this purpose we **analyse the activity data** deriving from the use of our Service. We use a third party analytics service for this purpose.

8.2 We do not place first-party cookies on your device.

8.3 We place third-party cookies on your device. We use the data collected through cookies to improve our website and to analyse and measure audience and traffic. We notify you of this cookie with a cookie banner on our homepage.

9. How long we store your personal data

9.1 If you are a user of our services, we will **delete your personal data** from all servers **12 months after the last time you use the** service.

9.2 We keep the data provided by your employer for the duration of the relationship with your employer.

9.2 We may have a legal obligation to keep personal data for a longer period to comply with applicable laws and regulations, such as fiscal laws. If such an obligation exists, we will store your data for the period required by law.

10. Automated decision making

We do not use automated decision making in our Service.

11. Your rights and how to exercise them

- 11.1 You have the **right to receive information** about the personal data we collect and store about you.
- 11.2 You have the **right to obtain a copy of personal data** we hold about you.
- 11.3 You have the **right to make us correct any inaccurate data** we have about you.
- 11.4 You have the **right to restrict** our use of your personal data or **have your data deleted** completely.
- 11.5 You have the **right to receive** the personal data concerning you in a format that would **enable you to port your data** to another service.
- 11.6 You have the **right to file a complaint** with the supervisory authority, as elaborated on in clause 12 of this privacy policy.
- 11.7 If we collect and store your data based on your consent, you have the **right to withdraw consent** at any time. You can do so by sending a message in the Service, by sending an email to the Privacy Officer at privacy@ubutler.nl, or by contacting your Relocation Coordinator.
- 11.8 You can exercise any of these rights, by emailing the Privacy Officer at privacy@ubutler.nl.

12. How to raise a complaint with the supervisory authority

- 12.1 If you have reason to believe that we processed your personal data in breach of our legal obligations, you have the right to lodge a complaint with a supervisory authority.
- 12.2 The supervisory authority in the Netherlands can be contacted via:

Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ Den Haag
Netherlands
Telephone number: +31 070-8888 500
Website: www.autoriteitpersoonsgegevens.nl

13. Changes to our privacy policy

- 13.1 We review our privacy policy at least once a year.
- 13.2 We reserve the right to alter the privacy policy at any moment. In case of significant changes, active users shall be notified. The latest version of the privacy policy is uploaded to our website at all times. Your further use of our services after the change will be subject to the updated privacy policy.
- 13.3 This privacy policy is publicly available on www.ubutler.nl, as well as visible and accessible in all uButler services.

14. Applicable laws

- 14.1 We process your personal data in compliance with the General Data Protection Regulation (2016), and the Dutch Implementation Act GDPR, as well as any other applicable laws.
- 14.2 Any legal right or obligation that is not mentioned in this Privacy Policy, yet included in the GDPR or any other applicable laws, exists alongside the clauses in this policy.