

## Privacy Policy | Rinkel B.V.

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Personal data is sacred. Rinkel therefore adheres to privacy laws and regulations. This means that your personal and other data is safe with us and we will always process it properly. This Privacy Policy explains how Rinkel deals with your personal data.

If you have any questions or would like to know exactly what personal data we hold, please contact Rinkel on +34 936 075 678 or email us at [ayuda@rinkel.es](mailto:ayuda@rinkel.es).

### OUR SERVICES

By using our service, you entrust certain information to us. This may include personal data. We only store and use the personal data directly provided by you for the service you use or which has clearly been provided to us for processing purposes.

We use the following personal data to provide our services:

- Name and address details;
- Telephone number(s): both your own and those of your contacts/customers;
- Billing address;
- Email address;
- Payment information; and
- IP address

## HANDLING OF ORDERS

We use your personal data to properly process any order you place with us. Where applicable, we may then give your personal data to our delivery service to have the order delivered to you. We also obtain information about your payment from your bank or credit card company.

We use your payment information, name and address details, email address, telephone number, and billing address. We need this information because of the agreement we have with you. We will keep this information until your order is completed and for seven years after that (this being the legal retention period).

## ACCESS TO THE PORTAL

Through our portal (<https://my.rinkel.com>), you gain access to a management environment where you can configure, specify, and make changes in the online service. We keep track of your activities and when these took place. This serves as evidence of them.

To do this, we use your IP address and email address. We need this information because of the agreement we have with you. We will keep this information for up to 12 months after our service provision to you ends.

## STATISTICS AND PROFILING

We keep statistics on the use of our online service. We use these statistics to improve our online service, for example to only show relevant information. We may combine your personal data to learn more about you. Of course, we will respect your privacy at all times. If you do not want this, please let us know.

We use your phone number, email address, IP address, and name and address details for this purpose. We do this based on your consent. We will keep this information for up to 12 months after our service provision to you ends.

## IN-APP PURCHASES

You can purchase products in Rinkel's online environment in addition to the usual subscription fees. Your personal data will be used to handle and register your purchases. To do this, we use your IP address and email address. We need this information because of the agreement we have with you. We will keep this information until your order is completed and for 12 months after that (this being the legal retention period).

## TAKING OUT A SUBSCRIPTION

You can take out a paid subscription via the Rinkel online service, in which case we will use your personal data to process the payment.

More specifically, we will use your billing address, phone number, payment details, email address, name and address details and your IP address. We need this information because of the agreement we have with you. We will keep this information for 12 months after you cancel your subscription and for seven years after that (this being the legal retention period).

## CONTACT FORM, CHAT AND NEWSLETTER

The contact form and live chat allow you to ask us questions or make requests.

We use your email address and IP address for this purpose. We do this based on your consent. We will keep this information until we are sure that you are satisfied with our response and then for 12 months after that. This will enable us to easily retrieve it

if you have any follow-up questions. This also enables us to train our customer service staff to deliver even better service.

You can sign up to our newsletter. for all the latest news, tips and information about our products and services. You can unsubscribe at any time. Each newsletter contains an unsubscribe link. You can also do this via your account. Your email address will automatically be added to the list of subscribers. This data will be kept until you cancel your subscription.

## Communication via WhatsApp

We use WhatsApp to send messages that are relevant to the services we offer. These messages can contain order updates, product recommendations, special offers, and other information that we believe may be of interest to you.

### **Signing up and unsubscribing from WhatsApp communication**

You can sign up to receive messages via WhatsApp by sending a message with the word [START] to our Dutch [WhatsApp number](#). For our Spanish-speaking customers, this is [EMPEZAR] to our Spanish [WhatsApp number](#).

To unsubscribe from WhatsApp messages, you can send a message with the word [STOP] to our Dutch [WhatsApp number](#). For our Spanish-speaking customers, this is [ALTO] to our Spanish [WhatsApp number](#).

You can also contact our customer service by email to sign up or unsubscribe. We strive to make our sign-up and unsubscribe processes clear and intuitive. We respect your choices and always act in accordance with your preferences.

## YOUR ACCOUNT

Our online service requires you to register first. You must then provide information about yourself and choose a username. We use this information to create an account which you can access using your username and a password of your own choosing.

The information we use in this regard is your name and address details, telephone number, email address, IP address, billing address and payment information. We need this information because of the agreement we have with you. We will keep this information for 12 months after you have terminated your account.

We store this information so you won't have to provide your details each time you

log in. It also enables us to contact you more easily when needed for the online service. You can edit information via your account whenever you want.

## OTHER PARTIES

We will not share your personal data with other companies or organisations except where necessary for the online service or as required by law. For example, if we suspect fraud we are allowed to report it to the police.

## ADVERTISEMENTS

We would like to send you advertisements about offers and new products or services.

We do this:

- by email
- through social media
- by telephone

You can object to these ads at any time. All commercial emails contain an unsubscribe link. You can block us or use the unsubscribe option. There is also a number blocking feature.

## SHARING DATA WITH OTHER COMPANIES OR ORGANISATIONS

We will in no event share your personal data with other companies or organisations except if this is necessary for our online service or if we are legally required to do so (for example, if the police need the information in connection with a suspected crime).

Some partners are located outside the European Union. Our website features social media buttons. These are used by the operators of these services to collect your personal data.

## COOKIES

Our online service uses cookies. Cookies are small files in which we can store information to save you from having to provide your details every time you log in. But they also allow us to see that you are visiting us again. When you visit our online service for the first time, we display a message explaining cookies. We will ask you to accept them.

You can disable the use of cookies via your browser, but please note that this will restrict the operation of some elements of our online service.

We have entered into agreements with other companies that place cookies (see next section) about their use of those cookies. We have no control over or responsibility for the cookies placed by third parties. However, you are free to accept those cookies, at different levels.

## COMPANIES WHO WE (CAN) SHARE YOUR DATA WITH

Rinkel purchases services from a number of companies to be able to provide or improve our online service. To use these services effectively, we may share personal data with those companies.

Because your privacy is of paramount importance to us, we strive to minimise the amount of data shared with them. Below you will find an overview of which data we share or may share with which company.

- Google

We use Google Analytics to track how visitors use our website. We have entered into a data processing agreement with Google. It contains strict arrangements about what information they are permitted to store. We have not arranged with Google to anonymise the IP addresses.

We also use Google Enhanced Conversions to better measure the effectiveness of our advertising campaigns.

Data: IP address, first and last name, email address, phone number, address.

- Meta

We use Facebook and Instagram to advertise our service(s) to their users. We track whether a Meta user (ID) has decided to visit our website and/or sign up for a (trial) subscription with Rinkel. We have entered into a data processing

agreement with Meta, which includes strict agreements on how they can use the data they receive.

Data: Unique identifier to distinguish users, email, phone number, first and last name, city, state, country and ZIP code.

- Mouseflow

We use Mouseflow to collect statistics on the use of our website(s). We may use this data to optimise our website and service. We have entered into a data processing agreement with Mouseflow. It contains strict arrangements about what information they are permitted to store.

Data: IP address.

- Intercom (Intercom R&D Unlimited Company)

We use Intercom to send automated, behaviour-based emails to our customers, to communicate with our customers via chat and email, and to gain insight into our customers' use of our services. We have entered into a data processing agreement with Intercom. It contains strict arrangements about what information they are permitted to store.

Data: IP address, email address, name and address, phone number(s)

- ChartMogul.com

We use ChartMogul to gain insight into our customers' subscriptions and usage data. We have entered into a data processing agreement with ChartMogul for this purpose.



Data: name and address, company details, phone numbers

- Sentry.io (Functional Software Inc.)

We use Sentry.io to receive error reports that help our product developers improve our services. In some cases, an error report may include personal data.

We have entered into a data processing agreement with Sentry to cover that scenario.

Data: phone numbers, name, IP address

- Bugfender (Beenario GmbH)

We use Bugfender to detect problems in our Android and iOS Apps.

Data: Device ID, IP address, email address, phone number(s)

- Slack (Slack Technologies Inc.)

We use Slack for internal business communications. Customer information may be shared in communications between our staff.

Data: IP address, email address, name and address, phone number(s),

- OpenAI (OpenAI OpCo, LLC)

We use the services of OpenAI to provide automated (AI) insights based on the content of phone conversations between end users and counterparties. We have entered into a data processing agreement with OpenAI, which includes strict agreements on how they can use the data they receive.

Data: Phone conversation content (transcription), Company name, Employee name (user)

- Rev (Rev.com, inc.)

We use the services of Rev to convert phone calls (audio) into transcriptions (text). We have entered into a data processing agreement with Rev, which includes strict agreements on how they can use the data they receive.

Data: Username, Company name, Street name, and City

- LinkedIn

We use LinkedIn to advertise our service(s) to their users. We track whether a LinkedIn user (ID) has decided to visit our website and/or sign up for a (trial) subscription with Rinkel. We have entered into a data processing agreement with LinkedIn, which includes strict agreements on how they can use the data they receive.

Data: Unique identifier to distinguish users

- HubSpot

We use HubSpot to send automated, behaviour-based communication (such as emails) to leads upon explicit consent from the user. We have entered into a data processing agreement with HubSpot, which includes strict agreements on how they can use the data they receive.

Data: Unique identifier to distinguish users, IP address, Email address, Name, address, and phone numbers

- Cloudflare

We use Cloudflare to protect all of our websites to ensure security is guaranteed and you can safely browse our domains. We have entered into a data processing agreement with Cloudflare, which includes strict agreements on how they can use the data they receive.

Data: IP address, log data

- VWO (part of Wingify)

We use VWO (Virtual Website Optimizer) to optimise and A/B test our website pages and collect statistics on the performance of these tests. We have entered into a data processing agreement with VWO, which includes strict agreements on how they can use the data they receive.

Data: Unique identifier to distinguish users, IP address, city, state, country

- Trustpilot

We use Trustpilot to send automated reviews to our customers, with the goal of collecting and sharing our customers' experiences with our services. To make this process efficient and secure, we have entered into a data processing agreement with Trustpilot. This agreement contains strict arrangements about what they can record and how they manage the collected data.

Data: Email address, First name

## Payment details

- Exact Online

For our accounts and records, we use Exact Online, which registers bank transactions and entries. We have entered into a data processing agreement with Exact. It contains strict arrangements about what information they are permitted to store.

Data: account holder's name, account number.

- SolarWinds

Our emails are checked for content and sender by SolarWinds. This is done via an automated process to assess whether an email sent to Rinkel should

be marked as spam or as undesirable. We have entered into a data processing agreement with SolarWinds. It contains strict arrangements about what information they are permitted to store.

Data: IP address, email address, sender's name.

- Microsoft

We use Microsoft Office 365 for our email correspondence and we have entered into a data processing agreement with Microsoft. It contains strict arrangements about what information they are permitted to store.

Data: IP address, email address, first name, surname, sender's name.

## SECURITY

Personal data security is of great importance to us. To protect your privacy, we have taken the following measures:

- Access to personal data is protected by a username and password.
- Access to personal data is protected by a user name and login token.
- Once obtained, the data is stored in a separate, secure system.
- We have put in place physical measures such as locks and safes to protect access to the systems that store personal data.
- We use secure connections (TLS) that shield all information between you and our website when you enter personal data.
- We keep logs of all retrievals of personal data.

## AMENDMENTS TO THIS PRIVACY POLICY

When we make changes to our online service, we will also amend this Privacy Policy. So always look at the date and check regularly for new versions. We will do our best to announce changes separately as well.

## ACCESS TO AND RECTIFICATION OR DELETION OF YOUR DATA

If you have any questions or want to know what personal data we hold about you, please feel free to contact us. You can find our contact details below.

You have the following rights:

- receive an explanation of what personal data we have and what we do with it
- access to the exact personal data that we have
- have any errors rectified
- have any outdated personal data deleted
- withdraw your consent
- object to any particular use

Please always state clearly who you are so we can be sure we are not editing or deleting someone else's data.

## FILING A COMPLAINT

If you feel that we are somehow not taking your privacy into account, you have the right to file a complaint with the supervisory authority. In the Netherlands, that's the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Of course, we are always open to feedback and are happy to think along with you so as to ensure your privacy as effectively as possible. So feel free to reach out to us first!

## CONTACT DETAILS

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