



## Privacy Statement

### **Policy.**

We, DG Packaging BV, have been designated as the controller for the processing of personal data. We believe your privacy is important and therefore want to protect and safeguard your rights regarding the privacy of your data. Within our company we work with personal data of customers and of our own employees. All concerned must be able to rely on our company to handle the personal data received carefully and securely.

In this privacy statement we describe how your personal data is handled and how we comply with our legal obligations. We show that we are doing all we can to ensure that we are reasonably expected to safeguard, protect and enforce the privacy of data subjects on the basis of the GDPR and the implementing Law on the general Data Protection Regulation (UGDPR).

### **Principles**

We handle your personal data in a secure manner and therefore respect the privacy of all parties involved. We adhere to the following principles:

#### **Stakeholders**

We process only the personal data of those involved considered in the execution of the activities entrusted to us. Personal data are also processed by employees who carry out our responsibilities. These can be employees working on the basis of an employment contract under civil law, but they can also be interns, temporary workers or freelancers.

#### **Legality, decency and transparency**

We process personal data in accordance with the law and in a proper and careful manner.

#### **Basis and purpose binding**

Personal data are collected and processed by us only for specific, explicitly defined and legitimate purposes. Personal data are only processed with a just ground.

#### **Data limiting**

Only personal data that is minimally necessary for the predetermined purpose is processed. Minimal data processing is the starting point.

#### **Retention periods**

Personal data are not kept longer than necessary. It may occur that the retention of personal data may be necessary for a certain period of time for the execution of commissioned work or to comply with legal obligations.

#### **Integrity and confidentiality**

We treat personal data confidentially and solely for the purpose for which this personal data has been collected.

#### **Passing on to third parties**

We only transmit personal data to third parties when this is necessary in the context of the execution of the tasks entrusted to us.

#### **Third party services or facilities**



In the event that the processing of personal data uses services or facilities of third parties, we make agreements regarding the standards that these services and facilities must comply with on the basis of the law.

### **Rights of data subjects**

We honor all rights of data subjects and inform data subjects in good time about the rights they have in the context of the GDPR.

### **Security**

We take appropriate organizational and technical measures at all times to adequately protect the personal data we process.

### **When does this policy apply?**

This policy applies when:

1. You provide your data to us via the contact form on our website;
2. You provide your data to us for the provision of one of our services;
3. When you register for one of our trainings;
4. When you apply for one of our vacancies;
5. When you visit our website.

### **What personal data do we process?**

1. Personal details (name, address, e-mail address, telephone number);
2. Company details (company name, address, employer contact person, telephone number);
3. Personal data you provide by means of communication to us;
4. IP address.

### **How do we collect your personal data?**

We receive personal data both directly from you and from external parties:

*Personal data we receive directly from you:*

1. When you visit our website;
2. When you leave your data through our website;
3. When you provide data to us through communication;
4. When you register for one of our trainings.

### **Personal data you provide to us about others:**

When you share a staff member's contact info. It is also your own responsibility as an employer to ascertain whether the persons concerned agree with this.

### **Why do we collect your personal data?**

We process your personal data in order to:

1. Communicate with you in the manner agreed between the parties;
2. Carry out the work commissioned;
3. To handle an application procedure;



- When you visit our website, we may use your data to improve your user experience on our website;
- When you register for one of our trainings we will use your data to finalize the registration. We may also use this data in the future to send you information about our services.
- In accordance with local laws and regulations, we may also use your personal data for marketing purposes. Where required, we will ask you for permission to perform all or some of these activities.

### **What is the legal basis for the processing of your personal data?**

We process your personal data on the basis of one of the following legal bases:

#### *Necessary for the implementation of the agreement*

You can think of the processing of your personal data for the registration of a training.

#### *Permission*

In certain circumstances, we are obliged to ask you to consent to the processing of personal data.

#### *Necessary to comply with a legal obligation*

We are obliged to process your data in order to comply with tax and other legal obligations.

#### *Necessary for the representation of a legitimate interest*

We will at all times weigh your privacy interests and our legitimate interests in the processing of personal data.

### **How do we secure your data?**

We have taken appropriate organisational and technical measures to safeguard your data against loss or unlawful processing. You can think of measures to safeguard the storage of data, such as use in the cloud and the use of encryption.

### **How long are your data stored?**

We do not store your personal data longer than that a basis can be relied upon.

1. The law obliges us to keep your personal data for 5 years when you have entered into a contractual relationship with us;
2. If you have applied for one of our vacancies, you will be deleted within 4 weeks after handling the application round. If you have given your consent, we will retain your data for a maximum of 12 months.

### **What are your rights?**

Under the privacy legislation, you have different rights with regard to the personal data that we hold about you. The starting point is that we respect and honor these rights. Where your rights conflict with the interests of our company, we will carefully weigh the mutual interests.

At any time, you can submit a request to view, correct or erase your personal data. In addition, you have the right to request restriction of the processing of your personal data, the right to object



(against automated individual decision-making) against the processing of your personal data and the right to Data portability.

To appeal to your rights, please contact us (see contact information). We can ask you to prove yourself, so we know for sure that we do not provide personal data to the wrong persons. In this case, when providing a copy of your identity document, we ask you to make your passport photo and social Security number invisible and to indicate that the copy is intended to exercise your rights with respect to your personal data. We must provide you with information within one month of your request regarding the follow-up to the request.

### **Reporting a data breach**

We take all the measures reasonably expected of us to ensure that personal data are processed in a careful manner within our company. In the event that a breach has occurred in connection with personal information, a data breach, we will undertake the legally required actions.

If you suspect that there is a data breach, please contact us (see contact information). It is important to do this as soon as possible so that measures can be taken as soon as possible.

### **Who do we share your data with?**

We only provide personal data to third parties if this is permitted under the law and is necessary for our business operations. With these processors within the meaning of the GDPR, we have concluded so-called processor agreements in which we have agreed in accordance with the legal regulations on the work to be carried out in the context of the processing of Personal data and the associated responsibilities.

These processors are:

1. I4Safety BV
2. Hulsman & Roestenburg
3. Microsoft

### **Transfer of personal data abroad**

When we process personal data in the cloud, we will request warranties from the respective cloud vendor in order not to pass on your personal data to countries outside the European Economic Area if they are not a Privacy protection level that is at least equal to the level of protection in the Netherlands.

### **How can I file a complaint?**

To file a complaint against the processing of your personal data, please contact us (see contact information).



You also have the right to lodge a complaint with the local supervisory authority. In The Netherlands This is the Dutch Data protection authority. You can contact them in the following ways:

1. Telephone: (+31) 900 2001 201
2. Online: <https://www.autoriteitpersoonsgegevens.nl>
3. By post: Postbus 93374, 2059 AJ The Hague

### **Contact**

If you have any questions about this Privacy statement, wish to file a complaint or wish to use your rights as a data subject, you can reach us in the following ways:

1. Telephone: (+31) 0800 090 90 90 / (+31) 85 484 40 95
  - Online: <https://dg-packaging.nl>
  - By post: Breguetlaan 23, 1438 BA Oude Meer, The Netherlands
  - E-mail: [info@dg-packaging.nl](mailto:info@dg-packaging.nl)