

Quality Management System	Appendix : 5.02.a Page : 1 of 3
Privacy Statement	Date : 01.01.2021 Rev. : 02

Objective

The objective of this Privacy Statement is to be transparent and accountable to customers, potential customers, employees, and other interested parties about the way in which Transafe deals with the processing of personal data.

Which personal data is processed by Transafe and for what purpose

Transafe processes your personal data when you use its services and/or because you provide these data to Transafe. Transafe is committed to ensuring that its services are open, honest and transparent. In this context, Transafe believes it is important for the client to know exactly which personal data is collected by Transafe and the purposes for which Transafe uses this personal data. Transafe has described this clearly in this Privacy Statement. Transafe guarantees that personal data will be collected, used and deleted carefully and in accordance with applicable laws and regulations.

Below you will find an overview of the purposes for which Transafe processes your personal data. In each case, the data used by Transafe for that specific purpose and the legal basis for processing these data are indicated. To keep it clear, Transafe has grouped everything by type of data flow.

General personal data

Services, customer management and financial administration

Purpose: financial administration
Personal data: contact details of the (contact person at the relevant) organisation and bank account number(s).
Basis: statutory obligation

Purpose: MARAD

Personal data:

- Crew module: assessment forms, certificates/diplomas, correspondence, CV,

performance interviews, profile photo, introduction forms, emergency numbers, absence registration.

- Security module: name, e-mail, position.
- Basis: execution of the agreement

Purpose: invoicing

Personal data: company data, the VAT number of foreign customers is registered.

Basis: execution of the agreement

Purpose: CRM

Personal data: company data, the VAT number of foreign customers is registered.

Basis: justified interest (commercial interest of Transafe)

Purpose: LMS (Academy)

Personal data: name, address, phonenumber, function, profile picture, progress, email, chat, notes and certificates.

Basis: required for proper functioning of the Learning Management System

Marketing

Purpose: newsletter

Personal data: name, e-mail address.

Basis: consent

Special and/or sensitive personal data

Transafe processes the following special and/or sensitive personal data on behalf of the client:

Purpose: alcohol and drug testing

Personal data: name of donor, results of alcohol and/or drug tests.

Basis: execution of the agreement, statutory obligation

Quality Management System	Appendix : 5.02.a Page : 2 of 3
Privacy Statement	Date : 01.01.2021 Rev. : 02

Cookies or similar techniques

Transafe uses two types of cookies or similar techniques:

■ *Functional cookies*

The cookies are necessary for the proper function of the website and make it easier for users to use the website. For example, saving your login details, so that you don't have to log in every time. Saving the contents of your shopping cart or closing the cookie notification are also part of the functional cookies.

■ *Analytical cookies*

These are cookies that in place to measure and analyse visitor behavior on the website. We use this information to make the website as optimal as possible. No personal or privacy sensitive data is stored with this function.

Automated decision-making

Transafe does not make any decisions about matters that may have (significant) consequences for persons on the basis of automated processing. These are decisions taken by computer programmes or systems, without the involvement of a person (for example, a Transafe employee).

Third parties

In principle, Transafe does not share your data with others. Transafe will only share your data if this is necessary for the performance of its services or if it has a statutory obligation to do so. In that case, Transafe will share your data with:

- Own employees: Transafe shares the data with employees when the purpose of the processing is in keeping with their position.
- Suppliers and subcontractors working for Transafe: Transafe works together with service providers who build and manage its ICT systems. Transafe makes good agreements with them

about their obligations and powers.

Transafe sets out these agreements in (processing) agreements.

Retention period

Transafe does not retain your personal data for longer than is necessary to achieve the purposes for which your data is collected.

Transafe applies the following retention periods to the following categories of personal data:

- First name and surname
- Date of birth
- Address details (possibly postal address)
- Telephone number(s)
- E-mail address(es)
- Bank account number(s)
- VAT number(s) (if foreign customer)

The retention period of customer data is up to 7 years after the termination of the contract, or shorter if the customer submits a request for removal. This retention period is for commercial purposes, in order to provide a back-up for customers and for tax audit purposes.

Health data, including results of alcohol and/or drug tests.

The results of alcohol and/or drug tests will be retained until a confirmation of receipt has been received from the client. After confirmation of receipt, all personal data will be deleted. The control sheet will be subject to the same provisions as the other customer data.

Security/Data Breaches

Transafe takes the protection of data seriously and takes appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification. Transafe has implemented technical and organisational measures to protect the personal data. A number of security measures are listed below:

1. All employees of Transafe have signed a confidentiality agreement;
2. Transafe uses the personal data only if it has added value;
3. Transafe only allows authorised persons to use personal data;

4. Transafe employs an external IT security firm to ensure the security of its server;
5. Transafe makes use of the services of third parties, called processors, for the processing of the personal data; Transafe has drawn up a processing agreement with all processors;
6. Information security at Transafe is based on ISO 27001.

If you have the impression that personal data is not properly secured or that there are indications of misuse, please contact Transafe at info@transafe.info.

Transfer of personal data to third countries or international organisations

Transafe does not transfer personal data to third countries or international organisations outside the European Economic Area ("EEA").

Right of inspection, modification, removal or complaints

You have the right to inspect, correct or delete your personal data. You also have the right to withdraw your consent to the data processing or to object to the processing of your personal data by Transafe, and you have the right to data portability. This means that you can submit a request to Transafe to send your personal data, which Transafe has in a computer file, to you or to another organisation mentioned by you.

You can submit a request for inspection, modification, deletion and data portability of your personal data, a request for withdrawal of your consent or an objection to the processing of your personal data to info@transafe.info. If you have any complaints about the way in which Transafe processes your personal data or handles your requests, please contact Transafe. The same applies to any questions or comments about the privacy conditions. To ensure that the request for inspection has been made by you personally, please include a copy of your identity document together with your request. Please redact (black-out) your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and citizen service number (BSN) on this copy. This is to protect your privacy. Transafe will respond to your request as soon as possible, but within

four weeks. The period can be extended by *two months*, taking into account the complexity and number of requests. You will be informed of such an extension.

Transafe wishes to point out that you also have the option of filing a complaint with the national supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can do this via the following link:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

Concluding provisions

This Privacy Statement is subject to change. The changes will be announced on the website. Transafe advises you to check the Privacy Statement regularly.

If one or more provisions of the conditions are null and void or voided, the remaining provisions will remain in full effect. If any provision of these supplementary conditions is not legally valid, the parties will negotiate the content of a new provision, which provision will be as similar as possible in content to the original provision. After termination of the agreement with the client, the provisions that by their nature are intended to remain in effect after termination, including the confidentiality clause, will remain in full effect.