

## Privacy Statement Roma Nederland B.V.

This Privacy Statement is published on June 23th 2020.

Roma Nederland B.V. (hereinafter referred to as Roma Nederland) respects the privacy of all with whom it has contact in accordance with the regulations and legislation published in the General Data Protection Regulation (GDPR) 2016/679, dated 27 April 2016. This Privacy Statement explains what personal information we may collect, and at what time. Also how, for what and for how long we use and store these. This Privacy Statement relates to the application and use of our products and services and to sales, marketing and activities under our agreements with customers. It also applies to individuals who apply for a job at Roma Nederland.

### About us

Roma Nederland is a contractor and production company established in Raamsdonksveer (NL):

- the development, contracting, assembly and maintenance of conditioned premises
- the engineering, production, sale and maintenance of insulation concepts, products and systems sheet metal and construction work.

### When do we collect personal information about you?

- when you use our products and services
- when you interact with our employees verbally, by correspondence, by telephone, websites or social media
- when you interact with our employees on the basis of an agreement, offer or information you have requested.
- if you have given your consent by means of an e-mail from us with a request (opt-in mailing) to be listed in a mailinglist
- when we collect personal information from other legitimate sources, such as data processors from third parties, public sources or social networks. We will use this information only if you have given them permission to share personal information with others
- We may collect personal information if it is considered to be a legitimate interest, and if this interest is not overridden by your privacy interests. Before data is obtained we collect, we ensure that a consideration is made, to ensure that there is a clearly defined mutual interest between you and Roma Nederland.

### Why do we collect and use personal information?

We collect and use personal data primarily for sales, marketing and customer service purposes. We also collect information about suppliers, partners and individuals looking for or working in our company. We may use your data for the following purposes:

- sending the information you have requested. This may include information about our products and services, events, activities and promotions of products and services of our associated partners. This communication is based on subscriptions and requires your permission
- execution of contractual obligations such as order confirmation, construction or production process related data, invoices, reminders and the like. The agreement can be concluded directly with Roma Nederland or with a partner of Roma Nederland

- carry out direct sales activities in cases where a legitimate and mutual interest has been indicated
- conducting marketing, relationship management and event campaigns
- respond to a 'contact' or other completed webform on our website(s)
- following up on incoming requests (customer support, e-mails, chats or telephone calls)
- possible service and maintenance activities on the products and services supplied by us in order to keep them in good condition and to extend the technical service life
- tracing and analysing data related to possible extensions, renovations, modifications or modifications of reproduction of the products and services delivered by us in the past
- tracing and analysing data relating to possible complaints or legal claims arising from the offers, products and/or services provided by us
- send you information about the products and services you have purchased from us
- information about defects or malfunctions in our products and services (system messages)
- contact you to find out your opinion about our products and services
- processing of an application.

## **Legal bases for the collection of personal data**

### **Collection of personal data on the basis of consent**

The collection of personal data on the basis of the data subject's consent is carried out using 'consent forms', in which documentation on the data subject's consent is stored. Individual permissions are always stored and documented in our systems.

### **Collection of personal data on the basis of contracts**

We use personal information to fulfill our obligations with respect to contracts and agreements with customers, suppliers and other partners with whom we work.

### **Collection of personal data on the basis of a legitimate interest**

We may use personal data if this is considered to be lawful and if the privacy interests of the persons involved do not outweigh these interests. Normally, in order to establish the legal basis for the collection of data, a consideration has been made identifying a mutual interest between Roma Nederland and the individual. This legal basis mainly relates to our sales and marketing purposes. We will always inform individuals of their privacy rights and the purpose for collecting personal information.

The consequences of not providing personal data are:

- that you cannot receive the information and/or offers you have requested or,
- that we cannot contact you in order to respond to your request and/or questions to us or,
- that we cannot enter into an agreement with you because the relevant data are not sufficiently made available to us by you or by third parties who are entitled to do this.

## **What type of personal data is collected?**

We collect name, phone number, position, and email address, in addition to your company name and contact information. We may also collect feedback, comments and questions that we receive from you in project and service-related communications and activities, such as meetings, telephone calls, documents and e-mails. From our websites, we may collect your company's email addresses and contact information and the interaction that has taken place through our site or our social media channels.

Photos, videos, messages or comments that you make available to us via social media may be read by anyone and are used for purposes beyond your or the control of Roma Nederland. Roma Nederland is therefore not responsible for the information you enter via social media.

When you apply for a job with Roma Nederland, we collect the information you provide during the application process. Roma Nederland does not collect or process special categories of personal data on the basis of race, ideology or other sensitive personal data.

## How long do we store your personal data?

We store personal data for as long as we consider it necessary to fulfill the purpose for which the personal data has been collected, taking into account our need to answer your questions or solve possible problems, to comply with the legal requirements under the applicable legislation, to attend any legal actions/complaints, and for the protection of purposes.

The nature and scope of the products we supply means that we can store your personal data in construction and production files for a period of at least 15 years after your last agreement with us. When the personal information we have collected is no longer necessary, we will delete it in a safe manner. We may process data for statistical purposes.

## Your rights to your personal data

You have the following rights with regard to your personal data:

- the right to request a copy of your personal data that Roma Nederland holds about you
- the right to request that Roma Nederland corrects your personal data if it is incorrect or out of date
- the right to request that your personal data be deleted when it is no longer necessary for Roma Nederland to retain such data
- the right to withdraw any consent to the processing of personal data at any time. For example, your permission to receive e-marketing communications
- if you wish to withdraw your consent for e-marketing, you can use the digital link to manage your subscriptions to our newsletters communication. Please note that you may still receive other messages and administrative communications from Roma Nederland due to the interaction that takes place with us
- the right to require Roma Nederland to provide you with your personal data and, if possible, to transfer this information directly (in a portable format) to another controller when the processing is based on consent or a contract
- the right to request a limitation on further data processing, in the event of a dispute regarding the correctness or processing of your personal data
- the right to object to the processing of personal data where the processing is based on legitimate interests and/or direct marketing.

Questions about your privacy rights can be addressed in the first instance to [info@romaned.nl](mailto:info@romaned.nl). By sending an e-mail to [info@romaned.nl](mailto:info@romaned.nl) you can request access to, correction or deletion of your personal data. If you remain dissatisfied with the processing of personal data by Roma Nederland, you also have the right to submit a complaint to the Dutch Authority for Personal Data: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

## The use of cookies

We use cookies to collect information while you browse the company's websites. Navigation information on the website includes standard information from your web browser, such as browser type and language; your IP address ("Internet Protocol"); and the actions you take on the company's websites, such as the web pages viewed and the links clicked.

This information is used to make websites work more efficiently, to provide business and marketing information to the owners of the site and to collect personal information such as browser type and operating system, referral page, path through site, ISP domain, etc. to understand how visitors use a website. Cookies and similar technologies help us to tailor our website to your personal needs and to detect and prevent security threats and abuse. Cookies do not identify you personally. You can choose whether or not you want us to use cookies using your browser settings.

## **General technical measures to protect your data**

Roma Nederland makes every effort to secure the collected personal data with the help of technical measures:

The personal data stored in our CRM system are protected by an ISO 27001-certified Information Security Management System (ISMS).

- logging
- firewalls
- virus scanners
- software against malware attacks
- the periodic making of backups that are kept securely.

## **General organisational measures to protect your data**

Roma Nederland makes every effort to safeguard the personal data collected with the help of organisational measures:

- personal data shall only be accessible to a limited group of persons within the organisation who need the data for the performance of their tasks. The limited number of persons within the organisation who process personal data for the performance of their duties all have a confidentiality clause with a sanctions policy.
- storage of personal data on servers in an enclosed space
- we create an information security awareness among employees
- we have protocols and procedures for the timely and effective handling of information security incidents and security vulnerabilities
- we adequately monitor compliance with protocols and laws and regulations.

## **Do we share your data with anyone?**

We do not share, sell, rent or trade your data to third parties without your consent, except as described below:

External service providers working on our behalf:

We may disclose your information to our subcontractors, suppliers or other related organisations for the purpose of providing services to you on our behalf.

External product suppliers with whom we work:

We work closely with various external product providers to provide you with a range of products and services designed to meet your extensive needs in building insulation construction and insulation products (e.g. doors). When you request or purchase one or more of these products, the relevant third party supplying the products may use your information to inform you and to fulfil their obligations under the agreements you have entered into with them. In some cases, our third-party product suppliers will act as data processors of your information, so we recommend that you read their privacy policies and sign a data processing agreement. These third party product providers will share your information with us, which we will use in accordance with this Privacy Statement.

## **If required by law:**

We will disclose your personal information if required to do so by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with any legal, regulatory or judicial process. However, we will do everything we can to ensure that your privacy rights remain protected.

## **Use of subcontractors (processors and subcontractors)**

If we use subcontractors to use personal information on our behalf, we are responsible for ensuring that they undertake to comply with this Privacy Policy and applicable data protection laws by signing a data processing agreement.

If the subcontractor uses personal data outside the EU/EEA zone, such processing must be in compliance with the EU privacy policy framework, EU standard contractual clauses for transfers to third countries or any other specifically mentioned legal basis for transfers of personal data to a third country.

## **Changes to this privacy statement**

Roma Nederland reserves the right to change this Privacy Statement at any time. You can always find the applicable version on our websites. We encourage you to read this Privacy Statement from time to time to ensure that you are satisfied with any changes. If we make changes that significantly alter our privacy policy, we will notify you by e-mail or post a notice on our websites before the change becomes effective.

Do you have any suggestions, complaints or questions about our Privacy Policy?

### **Contact:**

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