



PRIVACY STATEMENT

HEEREN MAKELAARS
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THE NETHERLANDS

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COC 34216116

1. GENERAL INFORMATION

A. PRIVACY

- i. Heeren Makelaars takes your privacy seriously. We process personal data about you when you use our website or services and when you provide us with these data yourself.
- ii. Within the meaning of the General Data Protection Regulation (GDPR), Heeren Makelaars is the so-called controller.

B. SUMMARY

- i. We make every effort to process the personal data you give us in a careful manner. The object of this privacy statement is to provide you with a transparent and clear overview of the following:
 - a. The purpose for and basis on which we process your personal data;
 - b. Which personal data about you we are permitted to process;
 - c. The period of time for which we will retain your personal data;
 - d. Which processors and/or subprocessors we use when processing your personal data;
 - e. Which rights you have under the GDPR with regard to processing by Heeren Makelaars;
 - f. Which measures we take to protect your personal data.

2. WHICH PERSONAL DATA WE PROCESS

A. THE FOLLOWING DATA MAY BE COLLECTED VIA THE WEBSITE

- i. Name
- ii. Gender
- iii. Address details
- iv. E-mail address
- v. Telephone number
- vi. Other personal data that you actively provide during (telephone) contact
- vii. Location data
- viii. Facts about your activities on our website
- ix. IP address
- x. Internet browser and device type

3. WHICH SPECIAL AND/OR SENSITIVE PERSONAL DATA WE PROCESS

A. MINOR

- i. It is not the intention for our website or services to collect data from website visitors who are below the age of 16, unless we have the written consent of their parents or guardians to do so. Heeren Makelaars is not able to check whether visitors are older than 16, which is why we recommend parents to be involved in the online activities of their children. In this way, we can both ensure that data about children are not collected without parental consent.

B. CONTACT US IF YOU SUSPECT THAT A MISTAKE HAS BEEN MADE

- i. If you are sure that we have collected personal data about a minor without the consent mentioned above, contact us via info@heerenmakelaars.nl. We will then delete these data immediately.

4. WHY WE NEED DATA AND HOW LONG WE RETAIN IT

A. HEEREN MAKELAARS PROCESSES YOUR PERSONAL DATA ON THE FOLLOWING BASES

- i. Your explicit consent, which you gave us to process data for specific purposes;
- ii. To enter into or perform a contract with you;
- iii. To meet a legal obligation;
- iv. To represent our legitimate interests in the context of our business operations or those of a third party.

B. HEEREN MAKELAARS PROCESSES YOUR PERSONAL DATA FOR THE FOLLOWING PURPOSES:

- i. To be able to approach you if this is necessary for the performance of our services or contract with you;
- ii. To be able to send you information, when asked to do so via the contact form or via your registration for the newsletter (based on the 'Stay up-to-date' link at the bottom of the website); and, finally
- iii. To analyse your behaviour on the website and, by doing this, improve our website and make sure it reflects your preferences.

C. RETENTION PERIODS

- i. Heeren Makelaars will not retain your personal data any longer than strictly necessary to achieve the purposes for which your data are collected and insofar as necessary for compliance with legal (retention) obligations and to resolve any disputes. If you would like information about the retention periods applicable in your specific case, please contact us at: info@heerenmakelaars.nl.

5. PROCESSING ACTIVITIES BY THIRD PARTIES

- i. In addition to any cookies we use, as set out in our cookie statement, we share the data about you that we collect on this website with the following third parties:
 - a. Google; for reporting purposes (analytics);
 - b. The Web Bakery; to ensure our website works properly;
 - c. Youvia ; for our marketing and communications;
 - d. Sales by Jet; for our digital findability;
- ii. We have made good agreements with the processors above. We require these third parties to offer a level of security for personal data that is the same or better as the level of security we would offer you in our role as the controller.

6. HOW WE MONITOR YOUR WEBSITE VISIT

A. COOKIES

- i. Heeren Makelaars uses a number of different types of cookies:
 - a. Functional cookies: these are cookies with a purely technical functionality. They ensure the website works properly; e.g. they remember your preferred settings are remembered. They also enable us to optimise our website and services via the website.
 - b. Third-party analytical cookies: these cookies are placed when analytical service providers like Google Analytics are used.
 - c. Tracking cookies: these cookies are placed by external parties. By reading these cookies, the advertiser recognises you when you visit a site that it is involved in too. If you continue browsing, you may see targeted ads. These cookies can track your online behaviour too, which enables the third parties in question to build up a very specific profile. This profile can be so detailed that it becomes personal data.

B. WHAT TO DO IF YOU DON'T LIKE COOKIES

- i. You set your cookie settings yourself the first time you visited our website. All non-functional cookies can be refused per category. With the exception of functional and anonymous analytical cookies, cookies are only placed after an active action by you as a visitor. You can change your settings at any time via our website.

7. ACCESSING, RECTIFYING AND ERASING DATA

A. YOUR RIGHTS

- i. You have the right to:
 - a. access your personal data;
 - b. submit a request to rectify data;
 - c. submit a request for us to process less data;
 - d. request the erasure of your data;
 - e. have your data transferred to someone else;
 - f. submit a complaint as described in Article 8.
- ii. If you have any questions or comments about data processing by Heeren Makelaars, send a request to info@heerenmakelaars.nl.
- iii. Heeren Makelaars will want to make sure it is actually you who has submitted an access request.

So, please include a copy of your identity card with your access, rectification or erasure request. To protect your privacy, black out your passport photo, MRZ (machine readable zone; the strip of numbers at the bottom of the passport), passport number and citizen service number (BSN) on the copy of your identity card above.
- iv. Heeren Makelaars will respond to your request as soon as possible but always within four weeks at the latest.

8. RIGHT TO COMPLAIN

A. INTERNAL COMPLAINT HANDLING

- i. If you have any complaints about the way in which (personal) data are being processed, Heeren Makelaars will be happy to resolve them in joint consultation with you. Direct your complaint to info@heerenmakelaars.nl for handling initially.

B. THE DUTCH DATA PROTECTION AUTHORITY

- i. Under the General Data Protection Regulation, you have the right to submit a complaint about our processing of your personal data to the Dutch Data Protection Authority. You can exercise this right by contacting the Dutch Data Protection Authority. For more information about your right to complain, see: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>.

9. SECURING COMMUNICATION VIA SSL - ENCRYPTION

A. SSL

- i. Heeren Makelaars uses secure coding technologies to protect you, as a visitor to our website. SSL (Secure Socket Layer) encrypts your data on our site. So, they are only visible to your and our server, not third parties.
- ii. We use SSL encryption on every part of our site where your data are used, e.g. when filling out the contact form. You can check and recognise this yourself. When you are on an encrypted part of our site, a lock symbol will appear in the bottom right or top left of your browser. You will also see that the URL changes from http:// to https://, which also shows that the page is secure.

B. WE TAKE SECURITY SERIOUSLY

- i. Heeren Makelaars takes the protection of your data very seriously. So, it puts appropriate measures in place to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised changes. However, if you ever feel that your data have not been secured properly, or if there are any indications of misuse, please contact us immediately at info@heerenmakelaars.nl.

10. CHANGES TO THIS PRIVACY STATEMENT

A. CHANGES

- i. Because Heeren Makelaars continually evaluates its policy and new processing purposes may be added to our website(s), it will sometimes be necessary to make changes to this privacy statement.

11. QUESTIONS

A. CONTACT PERSON

- i. Heeren Makelaars has appointed Eran Hausel as the data protection officer under the GDPR. If you have any comments after reading this privacy statement, or any general questions about the GDPR, contact us via info@heerenmakelaars.nl.