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Privacy Statement

English

Privacy Statement

Enovation Group B.V.

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Contact

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www.enovationgroup.com

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Introduction

This is the privacy statement of Enovation Group BV and its subsidiaries (hereinafter "Enovation Group").

Enovation Group considers the protection of your personal data and information security to be very important. We process your personal data in compliance with applicable data protection regulations, including the General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter the "GDPR").

Enovation Group has taken technical and organisational measures to protect your personal data against loss or any form of improper processing. You can read more about this on our website. Enovation Group continuously investigates measures according to the latest technology and appropriate to the service we offer you.

In this privacy statement we explain which personal data we collect and for what purposes. We do this by means of the various ways in which we receive, use, consult or otherwise process your personal data.

We will amend this privacy declaration whenever necessary so that it is always up to date. We therefore advise you to return regularly to keep abreast of any changes. The privacy statement was last amended on 05-07-2021. You can also download and print this privacy statement here.

Contact

For questions or comments about this privacy statement, please contact the Enovation Group Security Office at eso@enovationgroup.com or our Data Protection Officer at dpo@enovationgroup.com.

If you prefer to be contacted verbally, both can also be reached via our general number **+31 (0)88 8 366 366**.

1 Who is responsible for your data processing?

Enovation Group is an internationally operating ICT organisation with a focus on communication and connection especially in the Healthcare and Government sectors. Enovation Group has various subsidiaries and locations spread across Europe and uses different (digital) marketing channels.

Enovation Group coordinates the development, sale and delivery of Enovation Group products and services and delivers these mainly, but not exclusively, to the Healthcare and Government sectors. Enovation Group acts as Processor within the meaning of the GDPR in the context of the implementation of its products and services. This privacy statement is not applicable to that; this privacy statement focuses on the (personal) data that we process in our role as Processor. For more information about the products and services that you purchase from us, please refer to your myEnovation environment or our service catalogue on the website.

The legal entities of the Enovation Group Holding bv, Rivium Quadrant 2, 2909 LE in Capelle aan den IJssel with the Chamber of Commerce number 72234938 are responsible for all processing of personal data outside the scope of providing products and services.

Entities falling under the Enovation Group are :

Organisation	Trade name	Adress	Postal code & City	Country	Contact	Chamber of Commerce
Enovation B.V.		Rivium Quadrant 2	2909 LC Capelle aan den IJssel	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	24157738
Enovation UK Ltd.	Enovation UK	Thorncroft Manor, Dorking Road	Leatherhead, Surrey, KT22 8JB	United Kingdom	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	04253883
Comvio B.V.	Enovation Comvio	Gezellenlaan 6	7005 AZ Doetinchem	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	09091665
Enovation Belgium B.V.		Noorderlaan 147, box 9	2030 Antwerpen	Belgium	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	0550.742.343
Verklizan SARL		148 Rue de L'Université	75007 Parijs	France	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	532478575
Verklizan B.V.	Enovation	Rivium Quadrant 2	2909 LC Capelle aan den IJssel	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	24360668
Verklizan Ltd.	Enovation UK	Suite 17 Link 665 Business Centre	Haslingden Rossendale BB4 5HU	United Kingdom	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	06322590
Verklizan SL.	Enovation Spain	Paseo de la Castellana 135, 7º Planta	28046 Madrid	Spain	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	864760374
Verklizan GmbH	Enovation Germany	Hochstadtstraße 11	41469 Neuss	Germany	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	HRB12607
Multisignaal B.V.		Voorstraat 36	3241 EG Middelharnis	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	24397234
Centrum voor Publieke Innovatie - CPI bv		Voorstraat 36	3241 EG Middelharnis	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	24337846
Boomerweb B.V.		Traverse 3	3905 NL Veenendaal	The Netherlands	E : eso@enovationgroup.com T : +31 (0)88 8 366 366	09208279

All the aforementioned entities are subsidiaries of Enovation Group Holding based in the Netherlands.

Enovation Group B.V. is the parent company and as such provides various support services to its subsidiaries. All aforementioned Processing Agents shall comply with the safeguards required by Enovation Group as its parent company with a view to the careful and lawful handling of personal data.

1.1 Use within the Enovation Group

We may share the personal data we collect with other companies within the Enovation Group if these companies share various activities and business processes. We do this in order to fulfil contractual obligations or when there is a justified business interest.

1.2 Websites of third parties

The Enovation Group website may contain links to websites of third parties. Enovation Group has no control or authority over the linked third-party websites. A different privacy statement will apply to the use of these third party websites. This privacy statement of Enovation Group only relates to personal data obtained by Enovation Group. Enovation Group does not accept any responsibility or liability for the operation and/or content of third party websites.

2 What personal data do we process and why

According to Article 6 of the GDPR, the processing of your personal data must be based on one or more of the legal bases. Enovation Group sets out below what data we collect from you, when and what grounds for processing we apply when we use your data.

This privacy statement does not address the role of Processor that Enovation Group performs for its services. If you purchase services from Enovation Group and we process personal data on your behalf, please refer to your myEnovation environment or the service catalogue on our website.

In the event that we process your personal data, or you suspect that we do, and you have a question about this, we will first refer you to the data controller (e.g. municipality, doctor or institution) unless, of course, we are the data controller (if you apply for a job with us, for example).

2.1 Data & purposes

2.1.1 Service & Support

If you contact our Service & Support department, we record the data required to process your request:

- Name and address details;
- Contact details for electronic communication, such as your e-mail address or healthcare mail address;
- Telephone number;
- Correspondence and call notes;
- Call recording in case of telephone contact - if this is the case, this will be made known prior to the call. The data from the telephone calls is also used for training, analysis and improving our operational processes.

Depending on your request, the employee will be able to access information required to process your request, for example the services you purchase and (contract) data in the myEnovation environment.

We use this data to be able to respond as effectively as possible to your complaint, request or question. We save your question in order to be able to help you better later on and to analyse your customer satisfaction. We can also use this data to provide you with reports if we have agreed this in a contract.

2.1.2 Visiting the website

In order for the website to work properly, we require certain information. This information consists of your IP-address, the type of browser (the computer program you use to view internet pages), the operating system you use and the pages you visit on our website. We do this to secure our website and services and to detect and prevent any abuse.

If you contact us via the contact form on our website, we use the information you provide to have one of our employees answer your question. The information we ask from you in this case are gender, name, email address and phone number.

2.1.3 Social media

Enovation Group can be found on various social media, such as Facebook, Twitter and LinkedIn.

If you follow us on social media, or communicate with or about Enovation Group on social media, we may get access to (part of) your public profile data. When you share information about Enovation Group via social media, your data may become visible via those social media. Enovation Group itself also follows social media channels and can thus access data about you on social media.

Enovation Group may keep track of how many times a particular post has been shared and "liked" via social media to analyse its reach. We can also see which posts are made about Enovation Group via social media channels. In that context, we process the data necessary so that we can optimise the content of our social media activities as much as possible, such as the viewed and posted content and messages related to Enovation Group and metadata stored in the platform.

The purpose of this processing is to analyse the reach of the social media activities and to improve customer satisfaction. You can find more information about which social media cookies we use in our Cookie Policy.

The vacancies, articles and videos that you view on our website can also be shared via social media using buttons. To make these buttons work, we use cookies from the social media parties in question, so that they recognise you when you want to share a vacancy or video. Enovation Group and the social media party concerned are separately responsible for this. Enovation Group has no insight in the data that is collected and has no influence in the way your data is further processed by these parties.

Please read the privacy statement of the social media party concerned to find out how they process your (personal) data:

- Twitter: <https://twitter.com/en/privacy>
- Facebook: <https://www.facebook.com/privacy/explanation>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- YouTube: <https://policies.google.com/privacy>
- Vimeo: <https://vimeo.com/privacy>

2.1.4 Cookies

We use cookies and similar technologies to improve the user-friendliness of our website, to make the website more secure, to optimise your experience of our services and to recognise you when you return. In our Cookie Policy you can read more about which cookies are placed for which purposes and by which parties. You can always withdraw your permission by clicking the Cookie information & settings link at the bottom of the website.

We use cookies and techniques that are similar to cookies, such as link-tracking. Link-tracking allows us to see if you open our e-mails and to recognise you if you click through to the website from our e-mails.

2.1.5 Newsletters

On our website you can subscribe to newsletters. The newsletter contains information about Enovation Group products, services and events.

If you have signed up for the newsletters you will receive newsletters about your purchased services as well as about products and services directly related to your purchased services. You can always indicate that you no longer wish to receive the newsletters.

2.1.6 Vacancies & Applications

As soon as you apply for a vacancy, we will ask you - depending on the vacancy in question - to provide various details that will be used to process your application, such as:

- Name, address and place of residence;
- Telephone number;
- E-mail address;
- Gender;
- Date of birth;
- Highest education;
- Curriculum vitae;
- Motivation (letter);
- LinkedIn profile (optional);
- Availability.

In addition, we process the data that you provide us with if you mention this in your CV or motivation letter. This data is used to assess your suitability for the vacancy in question and to contact you about the process of the application procedure.

If Enovation Group offers you a job, your data will also be used to prepare the offer. If the offer is accepted, your data will be used to prepare and execute the employment contract.

If no employment contract is made, and only if you have given your consent, we will record your data in our system so that we can approach you for any future vacancies.

2.1.7 Assessments

Depending on the job level, an external assessment can be part of the application procedure. The results will be used to determine whether you meet the job requirements.

3 How long do we keep your data?

Enovation Group does not retain personal data any longer than is necessary for the purpose for which it was collected or processed, unless a legally longer period applies or if a dispute or (legal) case is pending/threatening.

The retention periods as referred to above and in this privacy statement do not address the role of Processor that Enovation Group fulfils for its services. If your healthcare professional, local authority or other Processor purchases services from Enovation Group and we process personal data on behalf of or for a client, we will first refer you to our client, your data controller.

Enovation Group applies different retention periods, unless we have to retain certain data for a longer period on the basis of a legal obligation. The retention periods vary according to the type of personal data.

Enovation Group has laid down its policy with regard to retention periods in its Corporate Quality Management System. If you have a specific question about one or more of these retention periods, please contact the Enovation Group Security Office at eso@enovationgroup.com

4 Third parties and transmission

This privacy statement does not address the role of Processor that Enovation Group performs for its services. If Enovation Group as a Processor engages another Processor, it shall agree an appropriate processor agreement that provides for appropriate technical and organisational security measures. In the event that Enovation Group engages an independent Processor, Enovation Group shall make every effort to agree on appropriate security measures here.

Furthermore, Enovation Group provides data to third parties with consent or if we are obliged to do so by law or regulation, as a result of legal proceedings, an authorised order or command issued by a government authority and/or in the event that we consider it necessary to protect our legitimate interests and/or the interests of third parties.

4.1 Third countries outside the European Economic Area

In some cases, it is necessary for Enovation Group to transfer your personal data to a party located in a country outside the European Economic Area (EEA). The EEA consists of the countries of the European Union, Liechtenstein, Norway and Iceland. Enovation Group will only provide your personal data to a party in a country outside the EEA if that country provides adequate protection measures or if we have entered into a so-called EU Model Agreement with the party to whom we provide your personal data.

5 What are your rights?

If Enovation Group acts as a Processor, the GDPR grants you, the data subject, a number of rights which we will explain below.

This privacy statement does not address the role of Processor that Enovation Group performs for its services. If we process your personal data on behalf of one or more of our customers, we always refer you first to the Processor for your question. If the request is made directly to us, we will in principle forward it to the Processing Manager.

If you approach us with a request for one or more of the aforementioned rights, we reserve the right to ask you to identify yourself adequately.

5.1 Insight and correction

If you would like to know which of your personal data Enovation Group processes, at which location and for which purposes, you can contact Enovation Group via our Security Office at eso@enovationgroup.com. You can also request correction of factually incorrect data. Enovation Group will respond to your request as soon as possible but at the latest within four (4) weeks. In principle, no costs are associated with the processing of these requests.

5.2 Objection

You can always object to the processing of your personal data, such as, but not limited to, the use of your personal data for (direct) marketing actions by contacting our Security Office at eso@enovationgroup.com. The emails or other messages sent by Enovation Group always include an unsubscribe option. If you use this option, you will no longer receive these messages. You cannot unsubscribe from essential service and maintenance messages.

5.3 Deletion

If you want Enovation Group to delete your personal data and/or your account, you can request this by sending an e-mail to the Security Office at eso@enovationgroup.com. It is possible that some personal data will be retained after the deletion request, for example if there is a legal obligation to retain the data. A deletion request may be refused because of ongoing obligations, for example. In this case you will always be contacted for an explanation.

5.4 Restriction of processing

If you have legitimate reasons to request restriction of the processing, for example because you question the correctness of the personal data that Enovation Group processes, or you have filed an objection against the processing of personal data, you can request this by sending an e-mail to our Security Office at eso@enovationgroup.com.

5.5 Data transfer

If we process your personal data because you have given your consent and this is done via automated procedures, or your data is processed on the basis of a contract you have with us, you have the right to request that we receive the relevant personal data you have provided to us in a structured, commonly used and machine-readable form. You can request this by sending an e-mail to our Security Office at eso@enovationgroup.com.

5.6 Withdrawal of consent

If the processing of your personal data is based on your explicit permission, you have the right to withdraw this permission at any time, without prejudice to the lawfulness of the processing based on the permission before the withdrawal.

5.7 Complaint

If you have a complaint about the use or other forms of processing of personal data by Enovation Group, you have the right to lodge a complaint with the competent supervisory authority.

Country	Supervisory Authority	Contact details
The Netherlands	Autoriteit Persoonsgegevens (AP)	T : +31 (0)88 - 1805 250 Site : https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-apelden-bij-de-ap Autoriteit Persoonsgegevens
United Kingdom	Information Commissioner's Office (ICO)	T : +44 (0)303 123 1113 Site : https://ico.org.uk/make-a-complaint/your-personal-information-concerns/personal-information-concerns/
Germany	Federal Commissioner for Data Protection and Freedom of Information (BfDI)	T : +49 (0)228 99 77 99-0 Site : https://www.bfdi.bund.de/
Belgium	Gegevensbeschermingsautoriteit	T : +32 (0)2 274 48 00 of +32 (0)2 274 48 35 Site : https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen
Spain	Spanish Data Protection Authority (aepd)	T : + 34 901 100 099 - 912 663 517 Site : https://sedeagpd.gob.es/sede-electronica-web/vistas/formConsulta/consulta.jsf
France	Commission Nationale de L'Informatique et de Libertés (CNIL)	T : +33 (0)1.53.73.22.22 Site : https://www.bfdi.bund.de/EN/Service/Contact/contact.html?nn=10396540

5.8 Managing your data via your myEnovation Account

You can also view and manage your personal data yourself in your myEnovation Account.