Privacy statement

Your privacy

EthXCom attaches great importance to the protection of your personal data. We therefore always treat personal data confidentially and with the greatest possible care and security. In doing so, we adhere to the requirements of the General Data Protection Regulation (GDPR). That means we:

- Only process personal data if there is a lawful basis for doing so, for example permission or the execution of an agreement. We are transparent about which personal data we process, for what purposes and how that happens. We do this when we collect your personal data request and through this privacy statement *("lawfulness, fairness and transparency"*);
- Collect and process personal data only for specific, expressly defined and legitimate purposes. We then process the data not further in a manner incompatible with the purpose *("purpose limitation"*);
- Process personal data only if they are adequate and relevant for the purpose. We do not process more personal data than is necessary for the purpose *("minimal data processing"*);
- Ensure that personal data is correct and, if necessary, updated (*"accuracy"*);
- Do not store personal data longer than necessary for the purpose of processing. When the data is no longer necessary, it will be destroyed or erased (*"storage limitation"*);
- Have taken appropriate measures to ensure that personal data are properly secured and remain confidential (*"Integrity and Confidentiality"*).

In this privacy statement we briefly indicate which personal data EthXCom processes, what measures we take to protect your personal data and what rights you have with regard to the processing of your personal data.

Processing of personal data

We process privacy-sensitive information for the performance of our services, including what is referred to as personal data. We may process your personal data because you leave data on our website or use our platform services. It may also be the case that we process your personal data, because it has been received as part of a consultancy assignment, risk analysis, research or training.

EthXCom will in any case process the following personal data of you, insofar as these have become known to us:

- Name, address and place of residence;
- Contact details such as telephone number and e-mail address;
- Data relating to your person, the company where you work and function and other information that you yourself (of your own accord) provided to us.

We may also process special personal data about you, such as, for example, financial information or a criminal record.

Purpose and basis of data processing

EthXCom processes personal data for the following purposes:

- Advice in the field of risk management, compliance, integrity and ethics;
- Fraud prevention consultancy;
- Data protection consultancy;

- Screening companies and individuals;
- Conducting compliance investigations;
- Supporting individuals and organizations in the context of confidential work, whistleblower scheme and helpdesk integrity;
- Conducting investigations, analyses, audits and monitoring;
- Providing training;
- Contacting customers and relations if this is necessary to provide our services to be able to perform;
- Sending newsletters, marketing communications and/or other Company Information;
- Analyzing visitor behavior on our website in order to improve the website to improve and to be able to better offer the range of products and services vote on visitor preferences;
- Establishing and handling contractual rights and obligations, such as administration, invoicing and payments.

EthXCom also processes personal data if we are legally obliged to do so, such as information we need for our tax return.
We process personal data exclusively on the basis of the principles stated in the GDPR.

Provision to third parties
EthXCom treats your personal data in the strictest confidence and will not rent or sell to third parties. We provide your personal data exclusively to third parties, if this is necessary in view of the aforementioned purposes. In In some cases, we may use third parties in the performance of our services who work on our behalf and under our responsibility where your personal data is processed.
Furthermore, we will not provide your personal data to other parties, unless this required or permitted by law. For example, it is possible that we provide data in cases in which we are obliged to do so, for example by a court order or a judicial verdict. In that case, we are legally obliged to provide this information.

Processing Agreement
With third parties that process personal data on behalf of EthXCom, we conclude a processing agreement to ensure the same level of security and confidentiality in safeguarding your data. EthXCom remains responsible for these processing operations.

Retention periods
EthXCom does not store your personal data for longer than is necessary to fulfill the purposes for which your data is collected.

Security of your personal data
EthXCom takes the protection of your data very seriously and takes appropriate technical and operational measures to prevent misuse, loss, unauthorized access, to prevent unwanted disclosure and unauthorized modification. We demand that too of parties that process personal data on our behalf. If you have the impression that your data is not properly secured or there are indications of misuse, please contact us directly.

Detection of a data breach

In the event of a data breach being discovered, EthXCom will act in accordance with the GDPR and the guidelines issued by the supervisors in this regard. In addition, EthXCom will inform the client and, if there is a high privacy risk, those involved immediately of the actual situation and take appropriate measures.

View, modify or delete your data

If your personal data is processed, you also have privacy rights. Of course we respect that. For example, with regard to the processing of your personal data, the right:

- On inspection (Article 15 GDPR);
- On rectification (Article 16 GDPR);
- On data erasure / oblivion (Article 17 GDPR);
- Restriction of processing (Article 18 GDPR);
- On portability / data portability (Article 20 GDPR);
- To object (Article 21 GDPR);
- To lodge a complaint (Article 77 GDPR).

If you want to exercise your rights, you can send a request to: info@ethxcom.com. To ensure that the request for access has been made by you, we ask you to send a copy of your proof of identity with the request. We hereby ask you to black out your passport photo and Citizen Service Number (BSN) in this copy you send. This is to protect your privacy. EthXCom will respond as soon as possible, but within two weeks, respond to your request.

Questions, comments or complaints

If you have any questions, comments or complaints about the protection of your personal data by EthXCom, you can contact us by email at info@ethxcom.com.

Amendments

For various reasons, EthXCom may from time to time make changes or amendments to its privacy policy. The most current privacy policy is at all times time on the EthXCom website.

This version came into effect on September 22, 2021.