

PRIVACY STATEMENT

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1. INTRODUCTION

Holland Motion Group is the parent company of Holland Hydraulics and Holland Actuators (as defined below and herein referred to as the “**Holland Motion Group Entities**” and jointly as “**Holland Motion Group**”, “**we**” or “**us**”), active in the provision of solutions for hydraulic and electro mechanical applications. The Holland Motion Group takes the protection of its customers, suppliers and other counterparties and their personal information very seriously. Therefore, such personal data is kept in a secure way and treated with utmost care.

While processing your personal data, the Holland Motion Group respects your right to privacy and will only process your personal information in accordance with applicable data protection laws.

This Privacy Statement (hereinafter: “**Statement**”) explains how we collect and use personal information about you during and after your relationship with us.

2. HOLLAND MOTION GROUP AS DATA CONTROLLER

The entity that is the ‘data controller’, as defined in the General Data Protection Regulation (“**GDPR**”) or in the Netherlands ‘Algemene Verordening Gegevensbescherming (AVG)’ for the processing of your personal data, is the Holland Motion Group Entity that you or the company that you work for have entered into an agreement concerning your activities with. This will be one of the Holland Motion Group Entities, which include:

- Holland Hydraulics B.V., Binnenhavenstraat 14, 7553 GJ Hengelo (The Netherlands) – registration no. CC (companies office) Enschede 08107495
- Holland Actuators B.V., Binnenhavenstraat 14, 7553 GJ Hengelo (The Netherlands) – registration no. CC (companies office) Enschede 08089333

3. DATA PROTECTION OFFICER

Should you have any questions about this Statement, if you have any concerns as to how your personal data is processed or if you wish to exercise your rights mentioned under paragraph 14 and 15, please contact our Group Data Protection Officer (hereinafter: “**DPO**”), on the following address:

Holland Motion Group
Att. Rob van den Nieuwboer
Binnenhavenstraat 14
7553 GJ Hengelo

Or email privacy@hollandmotiongroup.com

We aim to respond within 30 days from the date we receive privacy-related communications.

4. WHAT IS PERSONAL INFORMATION?

Personal data, or personal information, means any information relating to an identified or identifiable natural person (‘**data subject**’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

5. TO WHOM IS THIS STATEMENT ADDRESSED?

This Privacy Statement applies to following data subjects:

- 1) Customers and other counterparties including potential customers;
- 2) Suppliers and contractors;
- 3) Applicants (job seekers);
- 4) Occasionally other individuals such as visitors;
- 5) Hollandmotiongroup.com website users.

Please note that this Statement is aimed at all data subjects that Holland Motion Group processes personal data of in connection to the business to business activities of Holland Motion Group, Holland Hydraulics or Holland Actuators.

This statement does not form part of any contract to provide services. We may update this Statement at any time.

Holland Motion Group has chosen the following structure to enforce and implement data protection regulations:

- 1) We document our processing activities into a Record of Data Processing Activities and update this Record;
- 2) We have developed privacy statements in which data subjects are informed about the personal data Holland Motion Group collects, processes, discloses, transfers and what their rights are.

6. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

We may collect, store and use the following categories of personal information about you where such is necessary:

1) Customers and other counterparties including potential customers:

- Name (and company name)
- (Business) address
- Telephone number(s)
- Email address
- Banking details
- IP addresses

2) Suppliers and contractors:

- Name (and company name)
- (Business) address
- Telephone number(s)
- Email address
- Banking details

3) Applicants:

- Name
- Address
- Telephone number(s)
- Email address
- Details mentioned in your CV and application form

4) Other individuals / visitors to our office:

- Name (and company name)
- CCTV camera images

5) Holland Motion Group.com website visitors:

- Name
- Address
- Telephone number(s)
- Email address
- IP address
- Geographical location when you have enabled location tracking
- Information from cookies (e.g. Google Analytics)

6) Further information:

- All further personal data that might be necessary to adhere to this Statement
- All further personal data that you choose to provide to us

Special categories of sensitive personal information

We do not intend to collect, store and use 'special categories' of sensitive personal information of you. When we do need to process such personal data, in which case we may request you for your consent to do so. Special categories of personal data we may obtain are dietary restrictions or physical health access requirements e.g. when registering for events or trainings.

Further comments on the categories of personal data

The objective of listing the personal data as collected is to fully and completely inform you of the processing of your personal data. Holland Motion Group has taken great care in creating these lists. It may however be necessary for Holland Motion Group to process additional personal information than the information as set out in this Statement. When such happens, Holland Motion Group will adhere to the safeguards as set out in this Statement.

If you fail to provide mandatory personal information when requested, we may not be able to perform the contract we have entered into with you or the company you work for, or we may be prevented from complying with our legal obligations. Certain information is necessary to enter into an agreement with us and if not provided, we may not be able to enter into such agreement with you.

7. SOURCES OF PERSONAL DATA

We collect this information:

- **Directly from you**

We obtain personal information directly from you in a variety of ways, including via your business card when provided, when you complete our online forms, subscribe to our information- or newsletters, attend meetings or events we organize or visit our office. We may also obtain personal data directly when, for example, we are establishing a business relationship, performing professional services or products through a contract or order from you.

- **Indirectly**
We obtain personal data indirectly from a variety of sources. We may include personal data in our customer relationship management records to better understand and serve our clients and individuals, to comply with a legal obligation, or pursue our legitimate interests.
- **Public sources**
Personal data may be obtained from public registers (such as Companies House, Chamber of Commerce), news articles and Internet searches.
- **Social and professional networking sites**
If you register or login to our websites, or use social media (e.g. LinkedIn, Twitter or Google) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That information may include your name and email address and depending on your privacy settings, additional details about you – so please review the privacy controls on the applicable service to set how much information you want to share with us.
- **Clients**
Our business clients may engage us to perform professional services or deliver products which involves sharing personal data they control as part of that engagement. For example, we will have access to data regarding IP address. Our services may also include processing personal data under our clients' control on our software applications or development software.

8. PURPOSES OF PROCESSING

We will collect and use your personal information for the following purposes:

- Allowing Holland Motion Group to provide, promote and improve products and services;
- Interacting and communicating with prospects, customers, suppliers, resellers and other third parties both online and offline;
- Organizing events for prospects and customers;
- Providing prospects and customers access to our products and services;
- Allowing Holland Motion Group to manage Holland Motion Group's business operations and complying with internal procedures and policies (for example, monitoring of compliance to rules, procedures and policies such as e.g. internal and external audits or investigations);
- Allowing Holland Motion Group to purchase products and services and communicate with the (representatives of the) companies that supply such;
- Maintaining records or instructions of counterparties, business partners and suppliers, such as recordings, contact details of staff for contact and communication and provision of data;
- For recruitment and future personnel management purposes;
- Allowing Holland Motion Group to support suppliers and contractors;
- Allowing Holland Motion Group to secure its property (for example, by conducting CCTV for security reasons for the various Holland Motion Group premises);
- Participation in Holland Motion Group's marketing initiatives or branding activities;
- To comply with our legal obligations.

We will only use your personal information for the purposes for which we collected it, however it may be possible that we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9. LEGAL GROUNDS

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- **Contract**
We may process personal data as the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Consent**
We may rely on your consent for the processing of personal data for one or more specific purposes.
- **Legitimate interests of Holland Motion Group**
We may process personal data as the processing is necessary for the purposes of the legitimate interests pursued by Holland Motion Group or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Such legitimate interests include:
 - *Our products and services*: to provide, promote and improve products and services;
 - *Interaction*: to interact and communicate with prospects, customers, suppliers, contractors, applicants and other third parties;
 - *Events*: to organise events for prospects and customers;
 - *Access*: to provide prospects and customers access to our products and services (including by means of verification of your identity);
 - *Business operations*: to manage Holland Motion Group's business operations and complying with internal procedures and policies;
 - *Procurement*: to purchase products and services and communicate with the (representatives of the) companies that supply such;
 - *Support*: supporting suppliers;
 - *Security*: to secure the Holland Motion Group property;
 - *(Direct) marketing*: to deliver information about our products and services, market insights and specialty knowledge we believe is welcomed by our business clients, prospects and individuals who have interacted with us.
 - *Changes in our business and organization*: we may restructure, expand or reduce our business and this may involve the sale and/or transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Statement, be permitted to use that data only for the same purposes for which it was originally collected by us.
- **Legal obligations**
We may process personal data as this is necessary for compliance with a legal obligation to which Holland Motion Group is subject.

10. RECIPIENTS

Which third-party service providers process your personal information?

The following categories of recipients may receive your personal data:

- The company providing our software product development services
- The party providing financial services
- Our IT system support company
- Marketing services providers
- Recruitment services providers
- Other parties that support us in providing our services e.g. contractors, providers of telecommunication systems, archiving services, data management and cloud-based software services

All our third party service providers and other entities are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of a possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law or our legal obligations.

Intragroup data sharing

We may share your personal information with the Holland Motion Group Entities for administrative purposes, for business restructuring purposes and to provide professional services to our customers, as part of our regular reporting activities on company performance, for system maintenance support and hosting of data.

Data sharing outside the EEA

We store personal data on servers located in the European Economic Area (hereinafter: “EEA”). We may share your personal data with other Holland Motion Group Entities (please be referred to article 2 of this Statement) and trusted reputable third party organisations situated inside and outside the EEA when we have a business reason to engage these organisations.

Holland Motion Group guarantees an appropriate level of protection of personal data within the Entities of Holland Motion Group. If we forward your data to other parties outside the Holland Motion Group and outside the EEA, we evaluate on a case-by-case basis how the data will be processed and what the appropriate measures to adequately protect your data must be. If we use third parties outside the EEA and the country or international organisation within which this party is located does not, in the opinion of the European Commission, offer adequate protection in the processing of personal data, then we will only transfer personal data to them if there are adequate other safeguards, for example contractual arrangements approved by the European Commission (the ‘EU model clause’), Corporate Binding Rules and/or EU-US Privacy Shield certificate. If the processing to the country or international organisation outside the EEA does not offer an adequate level of protection and the conditions given below are also not met, the personal data will not be forwarded. If we do so, you have a right to know and in that case, you may obtain a copy of the applicable safeguards from the Holland Motion Group Entity that is appointed as the ‘controller’ for the processing of personal data.

11. COOKIES, WEBSITES

Cookies

Our website uses cookies. Cookies are small pieces of information (small files) which a website leaves on your equipment (e.g. your computer). The website instructs the web browser with which you view websites (e.g. Internet Explorer) to store these cookies on your equipment. On the websites of the controller two kinds of cookies are used:

Functional cookies: these cookies are necessary to make a website function. The controller uses functional cookies to facilitate navigation on the websites and to store specific user settings or user preferences, so as to optimize your use of the websites;

Analytical cookies: Holland Motion Group uses Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

Marketing cookies: The website may show videos and other content that you can promote and share via social media via a button, e.g. Youtube and LinkedIn. To do this, social media cookies are placed so that the platform recognizes the user when logged in. These cookies collect information about the page that is shared and visited. We use cookies for online advertisement. This is done in the most targeted way possible, in order not to show unnecessary advertisements. We use Google Adwords.

Websites

Our websites may contain links to other sites, including sites maintained by other Holland Motion Group entities. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

Holland Motion Group company systems

All information, including personal information, placed on or sent using Holland Motion Group's systems (including third party systems provided by Holland Motion Group or accessed through Holland Motion Group's systems) may be monitored, examined, recorded, copied, disclosed and used in accordance with Holland Motion Group's security policies and applicable law.

From a business perspective your personal details e.g. your name, business email and business telephone number may be used in reports, emails, business correspondence and documentation systems. Holland Motion Group has a lawful reason for holding this information on you to operate our business and provide our products and services. We cannot delete records of communication that hold personal data on you.

12. DATA SECURITY

Your personal data will be stored in secure information technology systems. We have put in place measures to protect the security of your information. Details of these measures are available in our ISO Managementsystem.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator or a suspected breach where we are legally required to do so.

13. DATA RETENTION

For how long will we retain your information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep contractual information about you (including offers, contracts and financial details) for legal, regulatory and tax purposes (7 years).

Personal data of applicants will be retained for one month, unless we have received your permission to keep it in file for a longer duration (1 year), or unless data are anonymized. We will dispose of personal data in a secure manner when we no longer need it.

14. OBLIGATIONS AND RIGHTS

Inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, you have the right to:

- 1) **Request access** to your personal information (known as a 'data subject access request').
- 2) **Request correction** of the personal information that we hold about you.
- 3) **Request erasure** of your personal information.
- 4) **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- 5) **Request the restriction of processing** of your personal information.
- 6) **Request the transfer** of your personal information to another party.

7) **Object** to the processing of your personal data.

8) **Withdrawal of Consent.** You can withdraw your consent that you have previously provided. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

Holland Motion Group does not conduct any automated decision making as referred to in the GDPR.

To submit a data request, as mentioned above, please follow this link
privacy@hollandmotiongroup.com

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

There are a small number of cases where we do not have to give you the information you have asked for. For example, if we are using data for the purposes of investigating or detecting crime.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (of to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

15. COMPLAINTS

If you consider that your personal data has been misused or mishandled, you may raise a complaint to the Data Protection Supervisory Authority, who is an independent regulator.

Holland Motion Group's Lead Supervisory Authority is:
Autoriteit Persoonsgegevens
Bezuidenhoutseweg 30
2594 AV THE HAGUE
Tel.: +31-88-1805250

Complaints can be submitted via following link:

<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>

Any complaint to the Supervisory Authority is without prejudice to your right to seek redress through the courts.

16. APPLICABLE LAW

These conditions are governed by Dutch law. The court in the district where the collector has its place of business has the sole jurisdiction if any dispute regarding these conditions may arise, save when a legal exception applies.

17. CHANGES TO THIS STATEMENT

We reserve the right to update this privacy statement at any time, and will post any updates on this webpage. This privacy statement was last updated 6th of May 2019.

Table 1

Record type	Access	Retention Period
Customer data in our Finance Systems (AccountView) Name and contact details (address, email and phone number), bank account numbers	Managing Director Sales Director Financial Controller Admin staff	7 years after approval of Financial Statement / Annual Report (Tax Law)
Supplier data in our Finance Systems (AccountView) Name and contact details (address, email and phone number), bank account numbers	Managing Director Sales Director Financial Controller Admin staff	7 years after approval of Financial Statement / Annual Report (Tax Law)
Customer data in Sales Systems (AccountView, Mors) Name, contact details (address, email, phone number)	Managing Director Sales Director Financial Controller Admin staff Sales staff Account Managers Marketing Manager	During the contract period if data has financial impact: 7 years after approval of Financial Statement / Annual Report (Tax Law)
Customer data in our Production and Engineering Systems Name and contact details (email address, fax and telephone numbers), FTP credentials	Managing Director Sales Director Engineering staff	Due to CE documentation: 10 years
Applicants information unsuccessful candidates Name and contact details (address, email and phone number) of candidate, CV and cover letter, track of status, email correspondence	Managing Director Financial Controller Hiring Manager	4 weeks without consent of applicant 1 year with consent of applicant
Social media export functionalities via Social Media Platform Facebook, Twitter and YouTube accounts of customers/prospects (only when manually provided by user)	n/a	Data is not stored locally. API/Plugin provided by Social Media platforms used.
Facilities access data and images from surveillance cameras (CCTV) Key card (“badge”) number and CCTV recordings which may be associated with the building(s) and carpark(s) to which you have access to our location, the reason(s) for which you were given access, “access data” (including the time you entered and exited security checkpoints using your badge or as a recording on CCTV), or similar information, all in accordance with applicable law.	Financial Controller	Facility access data: Within 1 month after your visit. CCTV: 1 month , unless those images can contribute to prove an offense, damage, incivility or allow to identify a perpetrator, a disruptor of the public order, a witness or a victim.
Photographs and video images for	Managing Director	Holland Motion

Record type	Access	Retention Period
company use and commercial use	Sales Director Marketing Staff	Group has a legitimate interest for publishing photographs on website and commercial material, however will only do this with prior consent of your organization.
Personal data in business emails Holland Motion Group has a legitimate interest to have litigation hold and retention time on email and will not need active consent of the data subject for this.	Managing Director Employees System Administrator(s) with special authorization	7 years

Table 2

Categories of recipients inside the EEA (including names of recipients as an example)	Arrangements
IT and Technology services providers •	Data Processing Agreement
Financial and operational software providers • AccountView • Mors	Data Processing Agreement
Tax Authorities and Agencies • Local Tax Authorities • Local Employed Persons Insurance Administration Agencies (e.g. UWV)	A data processing agreement is not required since this category of recipients is a controller itself.
Accountants and auditors Various accountants and auditors (e.g., vRP (ISO), TÜV Nord)	Data processing agreements are not required.
Office Software applications • Microsoft Office 365 • Amazon Web Services (Frankfurt / Ireland)	Data Processing T&C as part of Service Agreement
Third parties, resellers / partners of Holland Motion Group in the context of performing services • E.g.	Data processing agreements may be required, this will be decided on a one-by-one case

Categories of recipients outside EEA	Location	Safeguards
•		☐ Data Processing Agreement ☐ Corporate Binding Rules ☐ Privacy Shield (USA) ☐ Adequacy arrangements ☐ Standard Model Clauses
•		