

Last Updated on 25 May - 2018

This Privacy Policy sets out the policy of Opt/Net BV with registered office at Kerkedijk 7A in Bergen NH, The Netherlands ("Opt/Net BV"), who controls this website (www.optoss.nl) ("the Website"). The terms of this Privacy Policy apply in addition to the General Terms of Use for the Website and any other additional terms that may be provided in connection with any particular service offered on the Website.

The Website keeps log files that include your IP address for statistic and logging of abuse purposes only. Log files are under no circumstances shared with any third party except if required by law or court order of the competent court.

From time to time though we may invite you to supply personal information in order for us to authenticate your identity or to provide you with services from or in connection with the Website. In order to deliver such services, Opt/Net BV (or a third party on Opt/Net BV's behalf, which may be located in EU or Ukraine) will need to process and store your personal information, and may need or want to transfer it to third parties. By providing your personal information to Opt/Net BV (whether by signing up to the Opt/Net BV newsletter, updating and adding your company details to the database or other subscriptions on the Opt/Net BV Site or in connection with accessing and/or using other services offered on our website), you consent to such processing (by or on behalf of Opt/Net BV) in connection with such services and for any other purposes to which you consent at the time you provide the information or as provided in this Privacy Policy, and in particular you agree that:

- Opt/Net BV (or a third party on its behalf) can store and process your contact details and personal information if provided including: full name, e-mail, gender, company name and address, city, country, IP address, phone number, fax number, birth date, nationality, primary role, corporate website, number of employees and industry in a database;
- Opt/Net BV may use your personal information to send you information about issues Opt/Net BV finds or believes to be relevant to you, including third party information (however the sender will always be from Opt/Net BV for easy identification);
- Opt/Net BV may contact you via email if its terms change, if authorities demand it, or when services are added, updated or modified;
- you can manually request to be deleted from our database and all information held about you by Opt/Net BV will be removed;
- Opt/Net BV may use, store, transfer and process your personal information in accordance with the terms of this Privacy Policy and or any other purposes to which you consent at the time you provide the information; and
- if you choose to contact a company or organization through Opt/Net BV or the Website, Opt/Net BV is entitled to disclose any of your information or details that it holds (including your IP address) to that company or organization.

You can however, remove yourself from any of the Opt/Net BV mailing lists, commercial messages or info messages by following the instructions at the end of each email sent to you by Opt/Net BV or that are otherwise notified or made available to you. Any mailing lists or other personal information that we store and/or hold will in no way be shared, sold or in any other way revealed to any third parties other than (i) as specifically provided in this Privacy Policy or for a purpose that is made known to you at the time when you provide your personal information; or (ii) if required by law or court order by a competent court.

Cookies

When you visit an www.optoss.nl website(s), the Website uses “cookie” technology to try make that experience simple, personalized and meaningful. Cookies are small pieces of information which are issued to your computer or any similar device you use to access the internet e.g. smart phone, tablet or other mobile device when you visit a website and which store and sometimes track information about your use of the website. A number of cookies the Website use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the website and will last for longer.

The Website uses cookies to:

- create a specific log-in session for a visitor to the Website in order that page requests by that visitor are delivered in an effective, secure and consistent manner;
- recognize when a visitor to the Website has visited before; this means we can identify the number of unique visitors we receive to the website and allows us to make sure we have enough capacity for the number of users that we get;
- customize elements of the promotional layout and/or content of the pages of the Website; ■ store your product selections to the shopping basket;
- collect statistical information about how our visitors use the website(s) so that we can improve the website(s) and learn which parts are most popular;
- and Gather information through our advertising partners, about the pages on the Opt/Net BV website(s) that you visit, and also other information about other websites that you visit, so as to place you in an “interest segment”.
- This information is collected, in an anonymous form but may include information such as the county and city you are in, along with the name of your internet service provider. This information may be used to serve interest-based advertisements which it is believed will be to your benefit. For more information about how to turn this feature off please consult documentation of your web browser. Without these cookies, advertisements you encounter will be less relevant to you and to your interests.

Some of the cookies used by Opt/Net BV websites are set by us, and some are set by third parties who are delivering services on our behalf. Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser. Please note however, that by blocking or deleting cookies used on an Opt/Net BV website(s) you may not be able to take full advantage of the website's functionality.

a) Our cookies:

We have described the main cookies we use and what we use these for below:

Cookie name	Purpose	More Information
6b83d9e062ced0cce293d55f11637add	Authentication session to prevent having to login multiple times in one browser session.	http://www.optoss.nl/privacy/

b) Third party cookies



Purpose	Purpose	More Information
is_unique	Unique id to identify user on www.optoss.nl site. Identify user on www.optoss.nl site to link user activity on www.optoss.nl with statcounter.com logic	For more information visit LinkedIn's privacy policy page. http://statcounter.com/about/legal/#privacy
bcookie	Unique information. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
lang	LinkedIn language settings. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
IN_HASH	LinkedIn follow button settings. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
JSESSIONID	LinkedIn unique session id. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
leo_auth_token	Unique information. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
visit	LinkedIn follow button settings. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
X-LI-DDC	LinkedIn follow button settings. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic
X-LI-IDC	LinkedIn follow button settings. LinkedIn cookie, introduced by the LinkedIn share button. Used to track which pages the user visits to collect them.	For more information visit LinkedIn's privacy policy page. http://www.linkedin.com/static?key=privacy_policy logic

In addition to cookies, tracking gifs may be set by us or third parties in respect of your use of the Site. Tracking gifs are small image files within the content of our site or the body of our newsletters so we or third parties can understand which parts of the website are visited or whether particular content is of interest.

Clear Gifs (Web Beacons/Web Bugs)

Our third party advertising partner employs a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and

are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personally identifiable information.

Flash LSOs

We use local shared objects, also known as Flash cookies, to store your preferences such as volume control or high game score, or display content based upon what you view on our site to personalize your visit. Third Parties, with whom we partner, or may partner in the future, to provide certain features on our site or to display advertising based upon your Web browsing activity, use Flash cookies to collect and store information.

Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies follow this link:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118

Email and Communication Services - Member account, password and security


If a particular service offered on the Website or any other Opt/Net BV owned web site requires you to open an account, you must complete the registration process by providing Opt/Net BV with current, complete and accurate information as prompted by the applicable registration form. You then will choose a password and a user name. You are entirely responsible for maintaining the confidentiality of your password and account. You must not disclose your password to any third party. Furthermore, you are entirely responsible for any and all activities that occur under your account.

You agree to notify Opt/Net BV immediately of any unauthorized use of your account or any other breach of security. Opt/Net BV will not be liable for any loss or damages that you may incur as a result of someone else using your password or account, either with or without your knowledge. However, you could be held liable for losses incurred by Opt/Net BV or another party due to someone else using your account or password. You may not use anyone else's account at any time, without the permission of the account holder.

Use of Your Information

Opt/Net BV may use your personal information for the following purposes:

- administering your Website account(s) and otherwise in connection with any service for which you have provided your information, including any email alerts, transactions with us, downloads you make from the Website and uploads you provide to the Website and competitions and promotions that you take part in;
- responding to any enquiry you make;
- subject to your consent, sending you newsletters and/or alerts and information regarding Opt/Net BV or any third party's future services (in all formats to which you have consented e.g. post, email, text);

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- for generating aggregated statistics about users, traffic patterns etc. of the www.optoss.nl Website(s) and other services and developing Opt/Net BV's marketing plans.

The Website may also disclose your information as follows:

- if you have given your consent for Opt/Net BV to do so, to other selected organizations to enable them to contact you or send you information by post, telephone and/or email;
- to any service providers, sub-contractors and agents appointed by Opt/Net BV to perform the above functions on its behalf and in accordance with its instructions;
- to the third party who is the originator of a content that you have downloaded from Opt/Net BV's Website (and to equivalent third parties in connection with any similar or equivalent service offered by this Website);
- to third parties selected by Opt/Net BV as part of aggregated and anonymous statistics about users, traffic patterns whatsoever of the Opt/Net BV Website(s);
- to those individuals and/or organizations which are required to ensure Opt/Net BV compliance with any applicable law, regulations, legal proceedings or governmental requests;
- when you post material that does or may constitute a criminal offense, breach the rights of a third party, give a rise to a civil action or breach the Website's Terms of Use and Opt/Net BV's General Terms and Conditions and as otherwise necessary to protect the rights, property or safety of Opt/Net BV, its employees, contractors and its customers, to any relevant authority or third party requiring Opt/Net BV to disclose the identity of or locate anyone posting such material on an Opt/Net BV's website;
- to any individual or organization making a subject information request to Opt/Net BV.

In the event that Opt/Net BV is acquired by or merges with another company, your personal information may be passed to the purchasing/merging company amongst the transferred business assets. This will enable your relationship to continue with the relevant Opt/Net BV business despite the change of ownership. Your personal information may also be passed (on a confidential basis) to companies with whom Opt/Net BV is negotiating such a sale/merger as part of the verification exercise carried out on Opt/Net BV by the third party.


Updates and changes

If we decide to change the terms of our Privacy Policy, we will post those changes to this Privacy Policy, the homepage of the Website, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

If your personally identifiable information changes, or if you no longer desire any of Opt/Net BV's services, you may correct, or update your preferences, by making the change on our member information page or by contacting us by **telephone or e-mail**.

Discussion Forum and Blog

If you use the discussion forum, blog or comment field on this Website, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other users of these forums, blogs or comments, and could be used to send you unsolicited messages.

We are not responsible for the personally identifiable information you choose to submit in these forums. 

Furthermore, in some circumstances Opt/Net BV may display some of your personal information (name data) when you post material to a discussion forum, blog or comment field to allow users to identify each other.

Third party websites

This Website contains links to other sites that are not owned or controlled by Opt/Net BV. Please be aware that Opt/Net BV is not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies only to information collected by this Website

Third party advertisers

The ads appearing on this Website are delivered to users by third party advertising partners. We share Website usage information about users with our partners for the purpose of targeting our banner advertisements on this Website.

Our partners may use cookies and clear GIFs on this Website, which allow them to recognize a user's cookie when a user visits this Website. The information that our partners collect and share through this technology is not personally identifiable.

For more information about our third-party advertisers, or to learn more about the choices available to you regarding this anonymous information, [please click here](#).

Security

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Send content to a colleague

If you choose to use our referral service to tell a colleague or a friend about this Website or a specific article or service, we will ask you for your friend's or colleague name and email address. We will automatically send your colleague or friend a one-time email inviting him or her to visit the site. Opt/Net BV will store this information, but solely for the purpose of sending the one-time invitation.

If you have any questions about security or privacy on our website, please [contact us](#) individually or as per the below contact details:

GDPR COMPLIANCE NOTE OF OPT/NET BV

25 MAY 2018



Opt/Net BV is a “**Processor**”, according to the definition applied by the GDPR. It is an organisation which is processing personal data, doing this on behalf of a “**Controller**.” Company is working only with the anonymised or aggregated data, provided by the Customers (Controllers), and we do not hold the keys to de-anonymise or de-aggregate it.

Opt/Net BV has made an effort to identify **existing contracts** which will be in place after 25 May 2018, and concluded that no contracts, involving processing personal data, exist.

Two cases identified as when Opt/Net BV is dealing with the personal data, are:

- Recruitment process: HR data of the employees (at the moment there is only 1, DGA);
- B2B marketing activities.

In connection with the first case we will provide future employees and job applicants with the Protection of personal data, Recruitment Privacy Statement ([see Annex 1](#)).

B2B marketing activities of the company consist of regular updating potential customers and investors on the developments. We use MailChimp tool for this. In preparation for the GDPR enforcement day, Part of which requires that EU citizens have the right to ask about how their personal data is stored and used, MailChimp gave access to its client to the MailChimp’s contact export tool. By using this tool we can quickly show any of our contacts how their personal data is stored in our account (<https://kb.mailchimp.com/lists/manage-contacts/>).

We make sure that we are:

- Including the principles of GDPR into all future marketing activities
- Focusing on the data subject and adapting communication methods to their preferences
- Increasing accountability for all employees to adhere to the principles of GDPR

For contracts to be awarded on or after 25 May 2018, Opt/Net BV will ensure:

- we undertake sufficient due diligence of new suppliers and customers to ensure they can implement the appropriate technical and organisational measures to comply with GDPR (i.e. provide guarantees of their ability to comply with the regulations)
- terms and conditions are updated to reflect the standard generic clauses ([see annex 2](#), parts A & B).

We have customers and suppliers outside the EU. As the GDPR applies to data processing carried out by organisations operating within the EU, including any data processing by those organisations that happens outside the EU and also applies to organisations outside the EU offering goods or services to the entities in the EU, we will make sure our foreign partners are aware and adhere to the principles of GDPR.

To accomplish this, Opt/Net BV will set out, in each contract with suppliers, details of the nature, scope and duration of the data processing, and impose specific obligations on the Processor, including: i) the legal obligation to formalise working relationships with the Processor in contracts where processing of personal data is to be carried out by a third party on behalf of the Controller (see GDPR Article 28); ii) a requirement to create and maintain records of processing activities (see GDPR Article 30(2)); and iii) use only Processors who provide guarantees to implement

appropriate technical and organisational measures that are sufficient to secure that the processing will (a) meet the requirements of the GDPR and (b) ensure the protection of the rights of the data subject.

Notice to the employees of Opt/Net BV:

Don't forget to [document the process](#) in which you assess your systems; record every detail about your data- how you get it, where you keep it, how long for, and most importantly- why it's necessary for you to gather, process and store that data.

ANNEX 1 - Protection of personal data

Privacy Statement

Recruitment Procedure

The recruitment requires Opt/Net BV to process personal data concerning the person to be recruited.

Summary of procedure of selection:

1. Analysis of CVs
2. Organisation of interviews and finalisation of selection of candidates

What personal data do we process?

Your full name, address, gender, nationality, date of birth, data regarding your professional experience, qualifications and skills (CV).

Why do we process your personal data?

The purpose is to select a right candidate for performing tasks and activities required by our business.

What are the legal bases for processing this data?

The data processing is subject to General Data Protection Regulation.

Who is responsible for processing the data?

The data is processed by the HR assistant and hiring managers on need to know basis.

To whom is your information disclosed?

The HR assistant

The members of the selection panel

Hiring manager

How long do we keep your data?

The data is kept until and for the duration of the eventual indefinite duration contract is concluded, and archived accordingly to the acting Dutch business data archival policies.

How can you obtain access to information concerning yourself and, if necessary, correct it?

You can modify/update your CV through contacting HR assistant or hiring manager if such contact has been established.

Who should you contact if you have a question about the protection of personal data?

Data Protection Coordinator of the company.

Annex 2 - Part 1: Generic Standard GDPR Clauses

GDPR CLAUSE DEFINITIONS:

Data Protection Legislation : (i) the GDPR and any applicable national implementing Laws (ii) all applicable Law about the processing of personal data and privacy;

Data Protection Impact Assessment : an assessment by the Controller of the impact of the envisaged processing on the protection of Personal Data.

Controller , Processor , Data Subject , Personal Data, Personal Data Breach , Data Protection Officer take the meaning given in the GDPR.

Data Loss Event : any event that results, or may result, in unauthorised access to Personal Data held by the Contractor under this Agreement, and/or actual or potential loss and/or destruction of Personal Data in breach of this Agreement, including any Personal Data Breach.

Data Subject Access Request : a request made by, or on behalf of, a Data Subject in accordance with rights granted pursuant to the Data Protection Legislation to access their Personal Data.

Protective Measures: appropriate technical and organisational measures which may include: pseudonymising and encrypting Personal Data, ensuring confidentiality, integrity, availability and resilience of systems and services, ensuring that availability of and access to Personal Data can be restored in a timely manner after an incident, and regularly assessing and evaluating the effectiveness of the such measures adopted by it.

Sub-processor : any third Party appointed to process Personal Data on behalf of the Contractor related to this Agreement

1. DATA PROTECTION

1.1 The Parties acknowledge that for the purposes of the Data Protection Legislation, the Customer is the Controller and the Contractor is the Processor. The only processing that the Contractor is authorised to do is listed in Schedule [X] by the Customer and may not be determined by the Contractor.

1.2 The Contractor shall notify the Customer immediately if it considers that any of the Customer's instructions infringe the Data Protection Legislation.

1.3 The Contractor shall provide all reasonable assistance to the Customer in the preparation of any Data Protection Impact Assessment prior to commencing any processing.

1.4 The Contractor shall, in relation to any Personal Data processed in connection with its obligations under this Agreement:

(a) process that Personal Data only in accordance with Schedule [X], unless the Contractor is required to do otherwise by Law. If it is so required the Contractor shall promptly notify the Customer before processing the Personal Data unless prohibited by Law;

(b) ensure that it has in place Protective Measures, which have been reviewed and approved by the Customer as appropriate to protect against a Data Loss Event having taken account of the:

(i) nature of the data to be protected;

(ii) harm that might result from a Data Loss Event;

(iii) state of technological development; and

(iv) cost of implementing any measures;

(c) ensure that :

(i) the Contractor Personnel do not process Personal Data except in accordance with this Agreement (and in particular Schedule X);

(ii) it takes all reasonable steps to ensure the reliability and integrity of any Contractor Personnel who have access to the Personal Data and ensure that they:

(A) are aware of and comply with the Contractor's duties under this clause;

(B) are subject to appropriate confidentiality undertakings with the Contractor or any Sub-processor;

(C) are informed of the confidential nature of the Personal Data and do not publish, disclose or divulge any of the Personal Data to any third Party unless directed in writing to do so by the Customer or as otherwise permitted by this Agreement; and

(D) have undergone adequate training in the use, care, protection and handling of Personal Data; and

(d) not transfer Personal Data outside of the EU unless the prior written consent of the Customer has been obtained and the given conditions are fulfilled.

(e) at written direction of the Customer, delete or return Personal Data (and any copies of it) to the Customer on termination of the Agreement unless the Contractor is required by Law to retain the Personal Data.

1.5 Subject to clause 1.6, the Contractor shall notify the Customer immediately if it:

(a) receives a Data Subject Access Request (or purported Data Subject Access Request);

(b) receives a request to rectify, block or erase any Personal Data;

(c) receives any other request, complaint or communication relating to either Party's obligations under the Data Protection Legislation;

- . (d) receives any communication from the Information Commissioner or any other regulatory authority in connection with Personal Data processed under this Agreement;
- . (e) receives a request from any third Party for disclosure of Personal Data where compliance with such request is required or purported to be required by Law; or
- . (f) becomes aware of a Data Loss Event.

1.6 The Contractor's obligation to notify under clause 1.5 shall include the provision of further information to the Customer in phases, as details become available.

1.7 Taking into account the nature of the processing, the Contractor shall provide the Customer with full assistance in relation to either Party's obligations under Data Protection Legislation and any complaint, communication or request made under clause 1.5 (and insofar as possible within the timescales reasonably required by the Customer) including by promptly providing:

- . (a) the Customer with full details and copies of the complaint, communication or request;
- . (b) such assistance as is reasonably requested by the Customer to enable the Customer to comply with a Data Subject Access Request within the relevant timescales set out in the Data Protection Legislation;
- . (c) the Customer, at its request, with any Personal Data it holds in relation to a Data Subject;
- . (d) assistance as requested by the Customer following any Data Loss Event;
- . (e) assistance as requested by the Customer with respect to any request from the Information Commissioner's Office, or any consultation by the Customer with the Information Commissioner's Office.

1.8 The Contractor shall allow for audits of its Data Processing activity by the Customer or the Customer's designated auditor.

1.9 The Contractor shall designate a data protection officer if required by the Data Protection Legislation

1.10 Before allowing any Sub-processor to process any Personal Data related to this Agreement, the Contractor must:

- . (a) notify the Customer in writing of the intended Sub-processor and processing;
- . (b) obtain the written consent of the Customer;

. (c) enter into a written agreement with the Sub-processor which give effect to the terms set out in this clause [X] such that they apply to the Sub-processor; and

. (d) provide the Customer with such information regarding the Sub-processor as the Customer may reasonably require.

1.11 The Contractor shall remain fully liable for all acts or omissions of any Sub-processor.

Annex 2 - Part 2: Schedule of Processing, Personal Data and Data Subjects

The Contractor shall comply with any further written instructions with respect to processing by the Customer.

Any such further instructions shall be incorporated into this Schedule.

Description	Details
Subject matter of the processing	[This should be a high level, short description of what the processing is about i.e. its subject matter]
Duration of the processing	[Clearly set out the duration of the processing including dates]
Nature and purposes of the processing	[The nature of the processing means any operation such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data (whether or not by automated means) etc.
Type of Personal Data	[Examples here include: name, address, date of birth, NI number, telephone number, pay, images, biometric data etc]
Categories of Data Subject	[Examples include: Staff, customers, suppliers, patients, students / pupils, members of the public, users of a particular website etc]
Plan for return and destruction of the data once the processing is complete	[Describe how long the data will be retained for, how it be returned or destroyed]



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