

# PRIVACY & COOKIE STATEMENT

de.Trybe respects your privacy and ensures that your personal data are processed in accordance with currently applicable laws and regulations.

Personal data are data that relate to an identified or identifiable natural person. This privacy and cookie statement applies for the processing of personal data by and on behalf of de.Trybe.

## 1. Identity

de.Trybe B.V. (Dutch Chamber of Commerce no. 82224579) is the company responsible for the processing of personal data collected through the de.Trybe platform.

de.Trybe's registered address is:

Keizersgracht 62  
1015CS Amsterdam  
The Netherlands

Questions regarding this privacy & cookie statement can be directed at [info@detrybe.com](mailto:info@detrybe.com).

## 2. Processing purposes

de.Trybe processes the following categories of personal data:

- Name and address
- Telephone number
- E-mail address
- Payment information
- Correspondence
- Information related to browsing behavior

de.Trybe only processes your personal data insofar as required for the following purposes:

- To be able to contact you about a purchase or after filling out a contact form on the platform
- To send you information, such as newsletters upon registration
- For establishing and executing agreements upon making a purchase via the platform
- To fulfil a legal requirement
- To gain insight into the platform's website traffic



### 3. Rights of the data subjects

Under the General Data Protection Regulation (GDPR) you have the following rights:

- *Right of information and access (15 GDPR)*

You have the right to verify which of your personal data de.Trybe processes.

- *Right of rectification and erasure (16 & 17 GDPR)*

You have the right to have your personal data rectified or erased if the data are incorrect or if processing the data is no longer legitimate.

- *Right to restriction of processing (18 GDPR)*

In specific circumstances, you have the right to restriction of processing your personal data, for instance while waiting for the assessment of a request for rectification, or pending the assessment of an objection.

- *Right to object (21 GDPR)*

When de.Trybe processes your personal data by reason of a legitimate interest, you have the right to object to that processing.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing. In that case your personal data shall no longer be processed for such purposes.

- *Right to data portability (20 GDPR)*

You have the right to receive the personal data you have provided to de.Trybe in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on your consent or on a contract, and the processing is carried out by automated means.

- *Withdrawal of consent (7 GDPR)*

If de.Trybe processes your personal data on the basis of your consent, you usually have the right to withdraw your consent. We will immediately stop the processing. Withdrawal of consent has no retro-active effect. Any processing that has taken place up to that moment will, therefore, remain lawful.

- *Right to lodge a complaint (77 GDPR)*



You have the right to lodge a complaint with the Dutch supervisory authority (the Dutch Data Protection Authority (<https://autoriteitpersoonsgegevens.nl/en>) if you consider that the processing of your personal data infringes the GDPR.

#### **4. Security measures**

de.Trybe as well as any processor engaged by de.Trybe have implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

In particular, the server and website are continuously kept up-to-date and extra security has been installed on the website, such as a maximum number of login attempts before you are blocked and firewall rules have been installed to block abused functions/patterns.

#### **5. Data recipients**

In the performance of our services, de.Trybe may engage data processors and share your personal data with them. In such cases, de.Trybe shall enter into a data processing agreement in accordance with art. 28 GDPR. We will not share your personal data with third parties to use for their own purposes, unless you have granted permission to do so (such as when purchasing a partner package on the platform), or in case of a legal obligation.

#### **6. Cookies**

On the platform we keep track of visiting data such as the most requested pages of a visitor. The purpose is to optimize the design of the website. This data can also be used to place information relevant to you on the pages you visit, such as special messages in your interest fields or offers from advertisers. In this way, our services to you can be further optimized.

In addition, we make use of cookies when offering services. A cookie is a small text file that, when visiting the website, is placed on the hard drive of your computer. A cookie contains data so that you can be recognized as a visitor each time you visit the website. It is then possible to customize the website for you and/or to make it easier for you to log in.

You can disable cookies in your browser without this having far-reaching consequences for your use of the website. However, the consequence may be that certain parts are less or no longer accessible to you.

*Functional or necessary cookies*



Functional or necessary cookies help the website of de.Trybe B.V. function properly. These anonymous cookies ensure that your browser settings are stored, so you can view the website of de.Trybe B.V. on your computer screen.

#### *Analytics*

We use Analytics cookies to track the use of our platform. In this way a permanent cookie is placed on your computer or mobile device. This gives us insight into how and how often the de.Trybe platform is used, and on the basis of this data, adjustments can be made if necessary. This way we ensure that the platform works optimally.

Further, we process statistics about visits to the platform. This is done with a web analysis system, offered by Google Inc. The following data is stored in the web analysis system via cookies:

- a. the IP address (except for the last octet, which means that all data collected is anonymized to some extent)
- b. technical characteristics such as the browser you use (like Chrome, Safari, Internet Explorer or Firefox) and the resolution of your computer screen
- c. the page from which you arrived at the website of de.Trybe B.V.
- d. when and how long you visit or use the website of de.Trybe B.V.
- e. whether you make use of the functionalities of the website of de.Trybe B.V.
- f. which pages you visit on the website of de.Trybe B.V.

#### *Social media cookies from third parties*

These are cookies that enable functionalities of social media websites. For example, a Google map with interactive directions, a "share button" for Facebook, LinkedIn, Twitter and Google+. Through the website of de.Trybe B.V. access is offered to various social media, including but not limited to Facebook, Twitter, Google+ and LinkedIn. Using these social media cookies you can share information on the website of de.Trybe B.V. with others or recommend it. If you visit a webpage with a social media button and click on it, then cookies will be placed on your computer or mobile device by that social media party. These cookies include information about your browser and the websites you have visited with your IP address.

Through the website of de.Trybe B.V. videos are shown that come from third parties, including Vimeo. These third parties place cookies that make it possible to show the videos to you. There may also be cookies placed that are used to track your surfing behavior across multiple websites and build a profile of your surfing behavior. For the cookies that these third parties place and the data they collect, further conditions of these parties apply. de.Trybe B.V. is not responsible for the conditions of third parties. de.Trybe B.V. Media refers to the terms and conditions of the following parties: Facebook, Twitter, Google+, Twitter, Vimeo and LinkedIn.



### *Advertising cookies*

With these cookies, de.Trybe B.V. keeps track of how many and which ads you have seen. de.Trybe B.V. makes use of so-called re-targeting or re-marketing technologies on its website. This allows us to make interesting and personalized offers to you. In order to do this, de.Trybe B.V. places cookies which enable de.Trybe B.V. to track your surfing behavior on its website and to create a profile of your surfing behavior. Based on this profile, de.Trybe B.V. can show personalized ads to you on third party websites.

On the platform you will find a number of links to other websites. Although these websites have been carefully selected, we cannot accept any responsibility for the use of your data by these organizations. Please read the privacy statement, if any, of the website you visit.

## **7. Processing outside of the EU**

The data gathered via Google Analytics and Mailchimp is transferred and stored by Google and Mailchimp on servers in the United States. To protect your privacy, our website developer has concluded data processing agreements with Google and Mailchimp, which stipulate that they only acts as sub-processor in the processing of personal data of our website users. To protect your privacy, the European Commission approved "Standard Contractual Clauses" have been incorporated in these data processing agreements.

We keep the amount of data being processed limited. Mailchimp only processes your name and email address for the purpose of sending out the newsletter. Further, we have adjusted the privacy settings of Google Analytics in accordance with the guideline developed by the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*). As a result, your IP-address will be partially masked (the last octet), and we have turned off the option to share data with Google. This means that Google cannot use the processed data for their own purposes. We do not use other Google services in connection with the Analytics cookies. These practices ensure that the risks associated with the processing of your data are as low as possible.

## **8. Retention period**

We will not store your personal data any longer than is necessary. Upon termination of your user account, de.Trybe shall delete all personal data, unless and insofar as applicable law requires continued storage of the personal data.

