

Privacy statement

Van Herwijnen Kreston processes personal data in accordance with the General Data Protection Regulation (GDPR). In this privacy statement you can read how we handle personal data. This privacy statement concerns the processing of personal data by:

Van Herwijnen Kreston MKB Adviseurs B.V.
Stephensonstraat 17a
4004 JA Tiel, The Netherlands
Chamber of Commerce number 11023972

Van Herwijnen Kreston Accountants B.V.
Stephensonstraat 19
4004 JA Tiel, The Netherlands
Chamber of Commerce number 30091389

Van Herwijnen Kreston Belastingadviseurs B.V.
Stephensonstraat 17d
4004 JA Tiel, The Netherlands
Chamber of Commerce number 30091453

Van Herwijnen Kreston Overnames en Waarderingen B.V.
Stephensonstraat 17b
4004 JA Tiel, The Netherlands
Chamber of Commerce number 66830206

Email: privacy@vhkt.nl

Purpose

Personal data are processed, only if necessary (but not exclusively):

- pursuant to an agreement (for services)
- for maintenance, including updates and releases for the systems made available to Van Herwijnen Kreston
- for technical and data management, also by sub-processors
- for hosting.

Lawful processing of personal data

Personal data are always processed on a lawful basis, being pursuant to an agreement, pursuant to a legal obligation, a legitimate interest or based on consent.

If the basis is consent, you have the option to withdraw this consent at any time. You can withdraw your consent in the same way as you gave it. Withdrawing consent does not affect the lawfulness of the processing of the personal data before the withdrawal.

Processors and sub-processors

If Van Herwijnen Kreston uses processors or sub-processors, processing agreements are entered into where as a minimum the security measures used by Van Herwijnen Kreston are taken, and subject to the obligations that Van Herwijnen Kreston has under the agreement with its customer.

Van Herwijnen Kreston processes personal data as a processor on the instruction of controllers. If we act as a processor on your instruction as a controller, you can download the processing agreement [here](#).

Security

Van Herwijnen Kreston takes all appropriate technical and organisational measures to protect personal data against loss or any form of unlawful processing. It will adhere to the level applicable to it. In any case Van Herwijnen Kreston has adopted the following security measures:

- two-factor authentication for online portals and applications
- two-factor authentication for access to the network
- two-factor authentication for customer portal access
- password policy
- alarm system connected to a renowned security company
- security access office building
- non-disclosure and data breach statements in employment contracts
- processing and sub-processing agreements
- implemented backup and recovery procedures
- security and 24/7 monitoring of network connections
- 24/7 internet traffic scanning
- 24/7 email traffic scanning and whitelisting email senders
- daily vulnerability scan of the entire network
- daily patch management on servers and endpoints

Data breaches

There is a data breach in the event of a breach of the security of personal data due to, for example, loss, theft or incorrect addressing.

Van Herwijnen Kreston's security policy (see above 'security') limits data breaches as much as possible. All employees of Van Herwijnen Kreston undertake to adhere to Van Herwijnen Kreston's data breach protocol.

Any data breach is reported to the Dutch Data Protection Authority within 72 hours, *unless* the data breach is unlikely to pose a risk to the rights and freedoms of an individual.

Each data breach is registered by Van Herwijnen Kreston. This register lists:

- facts and data about the nature of the data breach;
- categories of data subjects affected and categories of personal data and, if possible, the number of data subjects. Actual personal data are not registered, only the category;
- consequences of the data breach;
- measures taken to address the data breach;

- whether the data breach has been reported to the Dutch Data Protection Authority;
- whether the data breach was reported to the data subjects.

Retention period

Data are kept for a maximum period of 15 years.

Data subjects' rights

A data subject has the following rights under the GDPR:

- right of inspection
The right to inspect the personal data that are processed about you and for what purposes they are processed
- right to correction
The data subject's right to have incorrect personal data rectified
- right to erasure
The right to have the personal data erased if:
 - *they are no longer needed for the purpose for which they were collected*
 - *the personal data are processed on the basis of consent and this consent is withdrawn*
 - *the data subject objects to the processing of his/her personal data, unless there is a prevailing overriding legitimate ground for the processing*
 - *the personal data have been unlawfully processed;*
 - *the personal data must be erased after a certain period on the basis of a legal obligation*
- right to restriction of processing
The right of a data subject to restrict the processing of his/her personal data if:
 - *the accuracy of the personal data is contested, for a period allowing the controller to verify the accuracy of this data*
 - *the processing of the personal data is unlawful and the data subject opposes the erasure of this data and instead tries to limit their use*
 - *the controller no longer needs the personal data for processing purposes, but the data subject needs them for the establishment, exercise or defence of legal claims*
 - *the data subject has objected to the processing pending the answer to the question whether the legitimate grounds of the controller outweigh those of the data subject*
- right to data portability
The right of the data subject to obtain the processed personal data in a structured, common and machine-readable format. As well as the possibility to easily transfer, copy or forward the personal data from one IT environment to another
- right to object
- right to automated decision-making, including profiling
The data subject's right to a human perspective on decision-making. This right does not apply if:
 - *the decision is necessary for the formation or performance of an agreement between the data subject and Van Herwijnen Kreston*

- Subject to a legal provision, which also provides for appropriate measures to protect the rights and freedoms and legitimate interests of the data subject
- the decision is based on the express consent of the data subject.

Website

Cookies

Van Herwijnen Kreston uses cookies on the website www.vhkt.nl to give you the best user experience. A cookie is a simple small file sent with pages from our website and installed by your browser on the hard disk of your computer.

Which cookies do we use?

Van Herwijnen Kreston uses analytical cookies from Google to collect statistics about the use of our website. Based on these statistics, we can then improve our website for your ease of use. You can read more about Google analytical cookies [here](#). Your privacy as a visitor is guaranteed with these cookies.

I don't want cookies on my computer

If you prefer not to have cookies installed on your computer, you can block the use of cookies. You must manually set this per computer and per browser via the browser settings. Each browser is set by default to accept cookies. It is also possible to install a so-called plug-in in your browser, so that you can easily block the cookies per website. Since every browser is different, please refer to the help function of your browser to adjust the settings.

Forms

On our website you have the option to fill in three forms:

1. Contact Form.

You can use the contact form if you would like us to contact you. To meet your request, we will receive your name, (company name if relevant) telephone number and e-mail address. These data will be deleted two weeks after we have contacted you unless the contact is followed up on at your request.

2. newsletter form.

You can use the newsletter form if you would like to receive our newsletters. In order to send you the newsletters, we would like to receive your name and e-mail address. These data will be deleted if you no longer wish to receive the newsletter. You have the option to unsubscribe from receiving a newsletter at any time by clicking on the unsubscribe button in the newsletter.

3. application form.

You can use the application form if you would like to apply for a job vacancy at Van Herwijnen Kreston. You must fill in your name on this form, you must also upload your CV and you have the option of enclosing a cover letter. Your data will be kept for up to four weeks after your application, unless you give permission to store your data for a longer period for any future vacancies.

Complaints/invoking of rights by the data subject

If you have a complaint about the use of your personal data or if you have a request on the basis of the rights referred to above ('rights of data subjects'), you can let us know by email at privacy@vhkt.nl. You will receive information about the follow-up to your request within one month of receipt of your complaint or request. In case of a complex request

or several requests, Van Herwijnen Kreston has the right to extend the aforementioned period of one month by two months. If this is the case, you will receive a notification within one month of receipt of your request.

You can read more about filing a complaint on the [website](#) of the Dutch Data Protection Authority.