

PRIVACY STATEMENT FOR VILLE GROUP AND ITS SUBSIDIARIES

GENERAL

Ville Group B.V. ('Ville Group', 'we' or 'us') values the privacy of users ('User', 'you' or 'your') who visit the website of Ville Group ('the Website') or the websites of affiliated companies. This Privacy Statement has been prepared to inform you about how we use your personal data. Personal data refers to any information that can directly or indirectly identify you. We believe it is important for you to understand how we treat your personal data and to be aware of your rights.

OUR IDENTITY AND ROLE

Ville Group is the umbrella name for Ville B.V., Aannemingsbedrijf Ville B.V., and Halk B.V., based in Strijen, Netherlands. We are the controller of your personal data under the General Data Protection Regulation ('GDPR') for the purposes described in this Privacy Statement.

WHAT PERSONAL DATA DO WE COLLECT, HOW DO WE COLLECT THIS PERSONAL DATA AND WHY?

The personal data we collect and process depends on your use of the Website and how you contact us. Ville Group collects the following personal data:

(a) Information about your visits to and use of the Website, as detailed in the 'Usage Data & Cookie Statement' section;

(b) Your email address and other necessary contact details for sending Ville Group newsletters, as explained in the 'Newsletters' section;

(c) Your email address and/or other essential contact details provided when you contact us, enabling communication with you, as explained in the 'Contact Details' section.

Further information regarding the processing of personal data related to online job applications can be found in our separate Privacy Statement for Job Applicants.

Re a) Usage Data & Cookie Statement

[Ville Group] collects information on how the Website is accessed and used ('Usage Data') through cookies and/or similar technologies. This Usage Data includes information such as your computer's anonymized IP address, the page from which you accessed the Website, duration and time of your visit, pages visited on the Website, unique identification numbers like your visitor ID, and other diagnostic data. The Cookie Statement outlines the purposes and principles of processing Usage Data.

Re b) Newsletters

We collect and process your email address and other necessary contact details when you subscribe to our newsletter. These details are used to send newsletters based on your consent (Article 6(1)(a) of the GDPR). You can unsubscribe from these newsletters at any time using the link provided at the bottom of the newsletters.

Re c) Contact Details

When you contact us, we collect and process your email address and/or other essential contact details (such as name, phone number, employer, and job title) provided by you. These contact details are used based on our legitimate interest to respond to your inquiries or requests (Article 6(1)(f) GDPR).

In addition to the purposes outlined in this Privacy Statement, and only to the extent permitted by law or if legally mandated, we may use your personal data for other purposes under the conditions set forth in the GDPR and relevant legislation. In any event, Ville Group will adhere to the transparency principle and other principles for the lawful processing of your personal data.

No automated decision-making

Ville Group does not make automated decisions about Users, which are decisions made by computer programs or systems without any human involvement from a Ville Group staff member, for example.

SPECIAL AND/OR SENSITIVE PERSONAL DATA THAT WE PROCESS

It is not our intention for our website and/or service to collect data about website visitors under the age of 16 unless they have parental or guardian consent. However, it is not feasible for us to verify if a visitor is over 16 years old. Therefore, we advise parents to monitor their children's online activities to prevent the collection of their personal data without parental consent. If you believe we have collected personal information about a minor without such consent, please contact us, and we will delete this information.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Your personal data is shared with departments and other companies within Ville Group as necessary for internal administrative purposes within the group and to serve other purposes outlined in this Privacy Statement.

We also share your personal data with the following organizations to the extent required for them to provide their services:

- (a) Hosting companies (TransIP);
- (b) Direct marketing service provider (Mailchimp);
- (c) Website analysis service providers (Google);
- (d) Law enforcement agencies if legally obligated to do so.

In the event of a sale, merger, or other transaction involving our company, we may also share your personal data with the acquiring organization.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal data only for as long as necessary for the purposes for which we process it. The retention period may vary depending on the purposes:

- a) Usage Data in Google Analytics is stored for [26 months];
- b) Information regarding your newsletter subscription is retained until you inform us that you no longer wish to receive the subscribed newsletter, or if we decide to discontinue the newsletter, for [one year];
- c) Your email address and/or other essential contact details provided when contacting us are retained for [up to seven years] after the last contact.

TRANSFER TO THIRD COUNTRIES

If we transfer your personal data to a country outside the European Economic Area (EEA), for example, to a service provider, we implement appropriate safeguards to ensure an adequate level of protection. You can request a copy of these safeguards by contacting [info@ville.nl].

We transfer your personal data to [Google LLC] in the United States to utilize Google Analytics. Google, including its US subsidiaries, adheres to the EU-US Privacy Shield, ensuring an appropriate level of protection for personal data processing. Further information is available at <https://www.privacyshield.gov/>.

We utilize Mailchimp for sending newsletters. Information collected, including your email address, is transferred to [The Rocket Science Group LLC] and stored by Mailchimp on servers in the United States. Mailchimp commits to comply with the EU-US Privacy Shield and Swiss-US Privacy Shield principles, ensuring an appropriate level of protection for personal data processing. For more information on Mailchimp's privacy policy, visit <https://mailchimp.com/legal/privacy/>.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We have implemented appropriate technical and organizational measures to protect your personal data. Our systems and programs are securely protected to prevent unauthorized access by individuals inside and outside our organization. Access to your personal data is restricted to individuals who require it for their work. Ville Group has taken the following measures to protect your personal data:

- Security software such as antivirus scanners and firewalls.
- TLS (formerly SSL). Most of our websites offer a secure internet connection to protect the personal data sent. The 'https' protocol and padlock icon in the address bar indicate this security.

If you believe your data is not adequately protected or there are signs of misuse, please contact us.

LINKS TO OTHER WEBSITES

The website contains hyperlinks to websites not operated by Ville Group, which may be of interest to Users. Ville Group has no control over these websites and does not monitor their privacy, accuracy, quality, or integrity. We advise you to review the privacy statement and policies of each website you visit. Links to third-party websites are provided for your convenience, and any use or disclosure of data on these sites is entirely at your own risk.

WHAT ARE YOUR RIGHTS?

You have the right to request access to, correction of, or addition to your personal data. Under certain circumstances, you can also request the deletion of your personal data, restrict its processing, or exercise your right to data portability.

Objections

You may object to:

- The processing of your personal data based on legitimate interests (Article 6(1)(f) GDPR) for reasons specific to you.
- The use of your personal data for direct marketing, such as newsletters.

If you object to the processing of your personal data for direct marketing, we will cease using your personal data for that purpose.

Below is a more detailed description of other rights:

Right of access: You can request access to your personal data and certain other information.

Right to rectification: You have the right to correct your personal data if it is inaccurate or incomplete.

Right to erasure: Also known as 'the right to be forgotten,' under certain circumstances, you may request the erasure or removal of your personal data.

Right to restriction of processing: Under certain circumstances, you have the right to block further use of your personal data. If processing is restricted, we may still store your personal data but not use it.

Right to data portability: Under certain circumstances, you have the right to receive and reuse your personal data in a structured, commonly used, and machine-readable format.

Please note that the GDPR rights mentioned are not absolute. There may be circumstances in which we may not fully comply with your request due to exceptions under the GDPR or Section 41 of the General Data Protection Regulation (Implementation) Act. For example, situations requiring limitations on your rights to protect the rights and freedoms of others, including Ville Group.

You can submit a request to exercise your rights by contacting [info@ville.nl] or by mail to [Handelstraat 16, 3291 CB, Strijen, The Netherlands], attention to [Privacy Legislation]. We may request additional proof of your identity to ensure the request was made by you, protecting your privacy. You always have the right to file a complaint with a data protection supervisory authority if you believe we are not processing your personal data in accordance with the GDPR. In the Netherlands, the data protection supervisory authority is:

Autoriteit Persoonsgegevens Website: <https://www.autoriteitpersoonsgegevens.nl> Postal address: P.O. Box 93374, 2509 AJ The Hague

CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to modify this Privacy Statement at any time. Therefore, we recommend checking this statement regularly. In case of significant changes to this Privacy Statement, we will inform you, for example, by placing a clear notice on our website or by sending you a direct message.

CONTACT

If you have any questions about this Privacy Statement, please contact us at [info@ville.nl].

Last revised: March 7, 2024.