

# Privacy Statement

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## 1 Introduction

With ZIVVER's service, located in Amsterdam and registered with the Dutch Chamber of Commerce under number 62937057, you can share information in a secure and user-friendly manner. To provide this service (our "**Service**"), we process personal data.

ZIVVER attaches great importance to a careful handling of personal data and therefore we process and secure personal data with the greatest care. Our method of working is monitored externally.

In this privacy statement, we explain which personal data we collect and use and for what purpose and on what legal grounds. We recommend that you read this privacy statement carefully, as this privacy statement applies to all users of ZIVVER. The Service is not intended for anyone who has not yet reached the age of 18.

This privacy statement does not apply to websites of third parties that you can visit from our Service by using links. We cannot guarantee that these third parties handle your personal data in a reliable or secure manner. We recommend to read the privacy statements of these websites before actually using them.

## 2 Information ZIVVER processes

### 2.1 *The Service*

#### 2.1.1 Information you provide during signup for an account

To make use of our Service you need a personal account. The data we process for that, are provided by you or your organisation. When using our Service, we ask for and collect the following data (depending on the data you complete in your account):

- First name and last name\*
- Email address\*
- Profile picture
- Phone number
- IP address\*
- Payment details
- Account ID

\* mandatory to complete signup. Without this information we cannot create your account.

#### 2.1.2 Information we process when you use our Service

For the functioning of the web application, it is necessary to use cookies. You can read more about cookies in our cookie statement on our website.

If you use ZIVVER, we automatically store your IP address in the log files of our web server. This is necessary to properly operate and secure the Service. We do not use your IP address to track and register your online behaviour. We are not able to link your IP address to your name, address, or any other identifying information, unless you actively provide us with such information and continue to use the same IP address.



Without this information you are unfortunately not able to make use of our Service.

## 2.2 Website

On our website, you will find various forms, such as the contact form and the download form. The data you voluntarily leave via these forms end up in our Customer relations management (CRM). If you are not a customer, we will not store data longer than two years after the last contact moment. The forms on our website have the following purposes:

- Download forms for content

Purpose I - When completing the form and providing permission for related information (such as blogs or news), we only process your data for the purpose of the requested downloadable information.

Purpose II - When checking the permission box, we process your data for the purpose of sending related information, such as blogs, updates, and news.

- Blog registration form

Purpose - When completing this form, we process your data for the purpose of sending our monthly blog.

- Newsletter registration form

Purpose - When completing this form, we process your data for the purpose of sending our monthly newsletter.

- Contact form

Purpose - When completing this form, we process your data for the purpose of answering your questions.

- Request for a quote

Purpose - When completing this form, we process your data for the purpose of sending and following up the requested quote.

We provide you with the ability to unsubscribe in each mail you receive from us.

## 3 Purposes of processing your information

If you use our Service, you provide us with data, which in some cases qualifies as personal data. We solely store and use the personal data you, or your organisation, directly give or of which is clear upon provision that they are provided to us for processing.

### 3.1 ZIVVER service

In general, ZIVVER processes personal data for the following purposes:

- Logging in and verifying /authenticating users of the Service;
- Sending and delivering messages and files via the Service;
- Communications between ZIVVER and the users;
- Monitoring and auditing the Service;
- Informing users on the decryption of messages;
- Analysing statistics and optimising the Service.

### 3.2 Testimonials



We only post your name along with your testimonial with your consent. If you wish to update or delete your testimonial, you can contact us at [support@zivver.com](mailto:support@zivver.com).

#### 4 Legal basis for processing data

ZIVVER collects and uses your information only where, the processing:

- is necessary for the performance of a contract to which you are party, including to provide you our Service and inform you about product updates by email.
- in order to take steps at the request of the data subject prior to entering into a contract.
- satisfies a legitimate interest (which is not overridden by your data protection interests), including to protect the safety and security of our Service.
- is based on your consent (which you are able to withdraw at any moment) for a specific purpose, including forms and cookies on our website and our newsletter and blog update;
- is needed to comply with a legal obligation.

#### 5 How ZIVVER shares information

We only share the data you provided to us with other parties when this is necessary in the context of the Service, the implementation of the agreement with you, or with your organisation, and/or if such provision is legally required.

- Transfer of data outside the European Economic Area

CRM data which is processed in our CRM-system is stored in United States. The transfer of personal data takes place under the EU-US Privacy Shield Framework.

#### 6 How long ZIVVER stores data

ZIVVER stores the personal data as long as necessary and in observance of the applicable laws and regulations.

If the agreement between you, or your organisation, and ZIVVER is terminated for whatever reason, your data will be deleted or disconnected (if actual deletion is technically not feasible). The same applies when you, or your organisation, indicate your account must be deleted, unless we are required to retain your data for legal purposes or for ZIVVER's legitimate business purposes (e.g. defending a legal claim).

#### 7 How to control your information

##### 7.1 *Your privacy rights*

##### 7.1.1 Your privacy rights with a consumer account or on your personal request

If you have a ZIVVER consumer account or receive information requested by you, you can exert your privacy rights as follows:

- In your account, you can:
  - correct your personal data;
  - you can terminate your account (and as a result thereof the processing of your personal data).

Such changes in or termination of your account will be effective immediately.

- By contacting [support@zivver.com](mailto:support@zivver.com), you can:



- request information about the personal data we maintain about you (we will inform you about the personal information we are processing);
- object to the processing of your data, provided that we cannot prevent others from sending emails to your email address;
- have your data exported (we will deliver you a copy of your data we maintain).

We will respond to your request within one month. We may ask you to verify your identity before executing your request. When your request is difficult to process, we might need more time to fulfil your request and extend the fulfilment of your request.

For help on processing requests please contact [support@zivver.com](mailto:support@zivver.com).

#### 7.1.2 Your privacy rights concerning your business account (under the responsibility of an organization).

For requests related to business accounts which fall under the responsibility of your organization, please contact your organisation. As a data processor ZIVVER will only process requests by explicit instructions from the data controller.

If your personal data is not correct, please request your organisation to have the data changed or deleted. If a complete removal is technically not feasible, we or your organisation will ensure that the data no longer will be connected to your account.

Your browser may provide the possibility to submit a do-not-track-request via your browser. However, since our Service does not operate optimally without the functionalities we have set, we will not accept such requests.

#### 7.2 Security and certificates

We have taken appropriate technical and organizational measures to protect your personal data against loss or other forms of unlawful processing. ZIVVER has been certified on ISO 27001 and NEN 7510. More information on how ZIVVER has implemented the privacy by design and by default can be found on the following web address: <https://www.zivver.eu/en/encryption-privacy-by-design>.

#### 7.3 Contact details

Do you have a question or a request? Please contact your organisation or ZIVVER. Mail to [support@zivver.com](mailto:support@zivver.com) or call 085 – 0160 555.

#### 7.4 Data protection officer (DPO)

We have appointed a data protection officer. The data protection officer can be reached at [dpo@zivver.com](mailto:dpo@zivver.com).

#### 7.5 Dutch Data Protection Authority (Dutch DPA)

As a data subject you have the right to lodge a complaint with the Dutch DPA, should you be of the opinion that we do not (fully) comply with the GDPR in relation to your personal data. The Dutch Data Protection Authority can be contacted from Monday to Friday from 9.00 to 17.00 hrs Central European Time via 088 – 1805 250 and 0900 – 2001 201.

### 8 Revisions to this privacy statement

We reserve the right to modify this statement. If we modify this privacy statement, we will notify you on our website and via our newsletter. We recommend that you consult this privacy statement regularly, so you are aware of any modifications.



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