

PRIVACY STATEMENT XOOTLE

Introduction

Xootle takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at privacy@xootle.com.

Who is Xootle?

Xootle is the besloten vennootschap Xootle B.V., with registered office at (8041 BL) Zwolle listed at the Traderegister of the Dutch Chamber of Commerce under 71744681.

Xootle is as the controller ultimately responsible with regard to the processing of your personal data.

Xootle has appointed a data protection officer. You may contact Raymond Girbes at privacy@xootle.com.

How does Xootle use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data Xootle uses for that specific purpose, the legal justification, and the amount of time Xootle keeps this data. For clarity's sake, we have categorised the purposes.

Services, customer management and financial administration

Purpose:	Financial administration
Information:	Company name, Billing address, Bank details, Outstanding balance
Legal basis:	Legitimate interests
importance:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose

Purpose:	Invoicing
Information:	Company name, Billing address, Bank details, Outstanding balance
Legal basis:	Legitimate interests
importance:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose

Purpose:	Order Management
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Information: Home address, Delivery address, Billing address, Email, Phone number, Payment information, Account number, Order Number, Complaint content, COC number, VAT number, Customer number

Legal basis: Legitimate interests
importance: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Handling complaints about the product
Information: Home address, Delivery address, Billing address, Email, Phone number, Payment information, Account number, Order Number, Complaint content, COC number, VAT number, Customer number

Legal basis: Legitimate interests
importance: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Providing the service itself
Information: Home address, Email, Customer file data, Financial data, Data necessary to provide the service, Data generated by the service

Legal basis: Legitimate interests
importance: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Handling complaints about the service
Information: Home address, Email, Customer file data, Financial data, Data necessary to provide the service, Data generated by the service

Legal basis: Legitimate interests
importance: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: CRM
Information: Name, Username, Email, Location, Order history, Social media account, Browser, OS, User ID, Phone number, Profile photo

Legal basis: Legitimate interests
importance: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Marketing

Purpose: Direct marketing
Information: Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address
Legitimate interests

Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose

Storage period:	As long as necessary for this purpose
Purpose:	Affiliate marketing
Information:	Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose
Purpose:	Newsletter
Information:	Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose
Purpose:	Social media marketing
Information:	Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose
Purpose:	Behavioural targeting
Information:	Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose
Purpose:	Loyalty program
Information:	Name, Home address, Email, Phone number, Click behaviour, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose

Website

Purpose:	Website analytics
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Information: Online behaviour, Location
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Account
Information: Name, Address, Email, Username, Password, User ID, Message content
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Submitting reviews or messages
Information: Name, Address, Email, Username, Password, User ID, Message content
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Chat feature
Information: Name, Address, Email, Username, Password, User ID, Message content
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Security and fraud prevention

Purpose: ID verification
Information: Photos, Biometric data, Electronic identification, Phone number, Password, Financial equity, Credit score, Financial transactions, Professional activities, Agreements and settlements, IBAN number, Name, Address, Social security number
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Data security
Information: Photos, Biometric data, Electronic identification, Phone number, Password, Financial equity, Credit score, Financial transactions, Professional activities, Agreements and settlements, IBAN number, Name, Address, Social security number
Legal basis: Legitimate interests
Interest concerned: Only manner to achieve purpose
Storage period: As long as necessary for this purpose

Purpose: Credit check

Information:	Photos, Biometric data, Electronic identification, Phone number, Password, Financial equity, Credit score, Financial transactions, Professional activities, Agreements and settlements, IBAN number, Name, Address, Social security number
Legal basis:	Legitimate interests
Interest concerned:	Only manner to achieve purpose
Storage period:	As long as necessary for this purpose

How did Xootle obtain your personal data?

Xootle has obtained your data because you have provided this data to us, and because Xootle has obtained your information from third parties. These third parties are: Cognito (www.cognitohq.com), HRC DIGITAL B.V. (www.hrcdigital.com).

What are your rights?

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

Access

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data Xootle has obtained about you, you may exercise your right of access by submitting a request to Xootle.

Making changes

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that Xootle makes these changes for you. You may request that Xootle modifies, corrects, supplements, erases or shields your information.

Restriction of processing of personal data

You also have the right, under certain conditions, to ask Xootle to restrict the processing of your personal data.

Right to object

If processing of your data takes place on the grounds of 'legitimate interest' by Xootle or a third party, you have the right to object to that processing.

Portability of data

You have the right to obtain your personal data from Xootle. Xootle will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

Automated processing

Whenever a decision about you is taken that is completely based on automated processing of your personal data, you have the right to request that that decision be re-evaluated by a person. You may at all times let us know your position on that decision or let us know that you do not agree with our decision.

Withdrawing consent

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in Xootle no longer being able to provide you with certain services.

Response from Xootle

A request can be sent to privacy@xootle.com. Xootle will comply with your request as soon as possible and in any case no later than one (1) month after Xootle has received such a request. If Xootle rejects your request, we will indicate in our reply why the request was rejected.

Recipients of your personal data

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfilment of an agreement between you and Xootle

It is possible that Xootle is required to submit your data to a third party, for example to fulfil a legal obligation.

Transfer to third countries or international organisations

It may be necessary, for instance for technical and operational reasons, to transfer your (personal) data to affiliates of Xootle located outside the European Economic Area. Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, Xootle will use the EU Model Clauses to protect your privacy as much as possible. If that is not possible, Xootle will ask your consent

to transfer your (personal) data to countries that do not maintain an adequate protection level. You may withdraw your consent at any time.

Automated Decision Making

Xootle can use automated decision-making processes based on your data, when it is necessary for the execution of an agreement between you and Xootle. It is possible that, based on your profile, some of the products or services of Xootle may not be available. In all cases of automated decision making, you have the rights set out in the section "What are your rights".

What are cookies and how does Xootle use them?

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of Xootle and then stored on the hard disk or in the memory of your device. The cookies placed via Xootle's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

Can changes be made to this Privacy Statement?

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

Questions, remarks, and complaints

If you have any questions regarding this Privacy Statement or the way in which Xootle uses your data, you can send an e-mail to privacy@xootle.com. If you have a complaint about the way your data is processed, please send an e-mail to privacy@xootle.com. Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the [Autoriteit Persoonsgegevens](https://autoriteit.persoonsgegevens.nl).