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# Nebu Privacy Statement

**Reference** : Nebu - ISO - 2018 - 0073  
**Version** : 1.3  
**Date** : May 18, 2018  
**Owner** : Małgorzata Mleczko  
**Validation:** : Otto van Linden  
**Status** : Final

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<b>Version Control</b>			
<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Change Log</b>
V1.0	Final	May 11, 2018	-
V1.1	Final	May 11, 2018	Minor changes
V1.2	Final	May 18, 2018	Added legal basis for processing data and communicating
V1.3	Final	May 18, 2018	Updated email types

## 1 Introduction

### We value the privacy of our visitors

Through our website [www.nebu.com](http://www.nebu.com), we process personal data. We, at Nebu, value the privacy of our customers and observe due care in processing and protecting personal data.

We follow the requirements of the General Data Protection Regulation (GDPR). This means we:

- **clearly specify our purposes** before we process personal data, by using this Privacy Statement;
- **limit our collection of personal data** to only the personal data needed for legitimate purposes;
- first **ask for explicit permission** to process your personal data in cases where your permission is required;
- take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **respect** your right to inspect, correct or delete your personal data held by us.

Nebu BV, is the party responsible for all data processing. In this privacy statement, we will explain which personal data we collect and for which purposes. We recommend that you read it carefully.

## 2 Use of Personal Data

By using our website, or otherwise directly engaging with our organisation, you are providing certain data to us. This could be personal data. We only retain and use the personal data provided directly by you or for which it is clear that it has been supplied to us to be processed (i.e. it should have a legitimate business interest/purpose).

We use the following data for the purposes as mentioned in this Privacy Statement:

- Name and address
- Telephone number
- E-mail address

Any other data that you may submit to us in order to fulfill the purpose of our collaboration.

## 3 Purpose

We will use your personal data when handling your contract, order or any other interest in our products or our organisation.

## 4 Centralised Relationship Management

We utilise a centralised Customer Relationship Management (CRM), HubSpot, to store and track all communications with our external stakeholders. If you engage in any of the following manners with our organisation, you will be added to our CRM and added to our mailing-list:

- Sending (or receiving) an email to Nebu and/or any of its representatives;
- Filling out a Contact Form (on our website);
- Becoming a customer/client of Nebu thereby becoming a registered user of any of our supporting systems, e.g. ticketing (support) system, financial systems, etc.

In light of the GDPR we need to track legal grounds and lawful basis for processing your data and communicating with you. If you engage in any of the above manners with us, the legal basis for processing your data and communicating with you will be carried out for a legitimate interest.

We respect your rights to review, modify and delete your personal data. You can request this by contacting us at any time. At all times, you will be able to update your email preferences and/or unsubscribe from all marketing communications. It is however, noted here that as long as you are a registered Nebu Data Suite user, as mentioned above, you cannot unsubscribe from relevant product updates and other operational support messages. If you wish not to receive those above mentioned product specific and operational updates, you need to send a request to deregister as a Nebu Data Suite user.

## 5 Promotion

Other than the advertisements on the website, we can inform you about news, new products or services:

- by e-mail
- via social media
- by telephone
- by surveys

## 6 Contact Form and Email Communication

We have a few email types to inform those interested of our products or services:

- Blog Updates
- Nebu News
- Product Updates

Each email contains a link allowing you to change your email preferences or unsubscribe

from our email communication.

If you fill out a contact form on the website or send us an email, the data you provide will be retained for as long as it is necessary depending on the nature of the form or the content of your email, to fully answer and correctly handle your message or email.

## 7 Surveys

Nebu may invite all visitors, leads, prospects, clients and business partners to complete web surveys created in the GDPR compliant Nebu Data Suite. Participation in these surveys is completely voluntary and the user, therefore, has a choice whether or not to respond and whether or not to disclose any requested information. The requested information typically includes contact information (such as name and address), and demographic information (such as zip code). Users' personally identifiable information is not shared with third parties unless we give prior notice and get a user's active consent.

## 8 Publication

We will not publish your customer data.

## 9 Retention

We will keep your data during the time of our collaboration/interactions.

After a period of 10 years without contact from your end, your data will be definitively erased from our database.

## 10 Providing Data to Third Parties

Your data are explicitly not provided to third parties.

By exception, if you actively expressed intent to buy and got enrolled in the sales process, your data might be shared with the Nebu official reseller relevant to your geographical location. [The official resellers](#) support Nebu and its prospects in regards to local sales and operational processes. Nebu ensures that the proper, GDPR compliant process is set in place and your data is at all times secure.

Our website features social media buttons. These buttons are used by the providers of these services to collect your personal data.

## 11 Webinars

For conducting webinars Nebu uses third-party software Zoom. To ensure a smooth running

of the webinar, sending notifications, follow-up emails about the event and details on how to join the webinar, data of registered webinar attendees is shared with Zoom Video Communications, Inc. based in San Jose, USA. The company is operating within the [EU-U.S. Privacy Shield](#) framework, which makes the data transfer between Hubspot and Zoom Video Communications, Inc. compliant with the GDPR as the Privacy Shield allows US companies, or EU companies working with US companies, to meet this requirement of the GDPR.

## 12 Hubspot

We use Hubspot to track visitors on our website and to get reports about how visitors use the website. Nebu website is created within the Hubspot framework. This means that we as Nebu use cookies set up by Hubspot to track visitors' activities on our pages. Visitors will be tracked anonymously even before they become contacts. If visitors have been added to our centralized Customer Relationship Management (CRM) (as per section 4), HubSpot will associate their previous page views based on the tracking cookie and will add his or her contact details. A detailed explanation of what kind of information obtained by cookies files we collect and use is captured by the [Nebu Cookies Policy](#) that can be found in on Nebu site.

## 13 Google Analytics

We use Google Analytics to track visitors on our website and to get reports about how visitors use the website. We accepted the data processing agreement from Google. We do allow Google to use information obtained by Analytics for other Google services, and we don't anonymize the IP-addresses.

## 14 Security

We take security measures to reduce misuse of and unauthorised access to personal data. We take the following measures in particular:

- Only users with the relevant role within the organization are granted access to personal data
- Access to personal data requires the use of a user name and password
- Access to personal data requires the use of a user name and login token
- We make use of secure connections (Secure Sockets Layer of SSL) to encrypt all information between you and our website when transferring your personal data

## 15 Third-party Websites

This statement is not applicable to third-party websites connected to this website through links. We cannot guarantee that these third parties will handle your personal data in a secure and careful manner. We recommend you read these websites' privacy statements before making use of these websites

## **16 Changes to this Privacy Statement**

We reserve the right to modify this statement. We recommend that you review this statement regularly, so that you remain informed of any changes.

## **17 Inspection, Modification or Suppression of your Data**

You can always contact us if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data.

## **18 Handling personal data of citizens from outside the EU**

Even though the GDPR legislation refers to processing EU citizens data only, Nebu will handle personal data of all visitors, leads, prospects, clients and business partners, even from outside of the EU, with the same careful consideration and the same GDPR compliant processes will apply.

## **19 Contact Information**

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