

# PRIVACY STATEMENT

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English

Privacy Statement

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**Enovation Group B.V.**

01-09-2023

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# INHOUDSOPGAVE

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## 0 INTRODUCTION

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Here you will find the privacy statement of Enovation Group Holding BV and its subsidiaries (hereinafter "Enovation Group" or "we" and "us/us").

Enovation Group considers the protection of your personal data and information security very important. We process your personal data in compliance with applicable data protection regulations, including the General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter the "GDPR").

Enovation Group has taken technical and organisational measures to protect your personal data against loss or any other form of improper processing. You can read more about this on our website. Enovation Group continuously investigates measures according to the state of the art and appropriate to the services we offer.

In this privacy statement we explain which personal data we collect and for what purposes. We do this by means of the various ways in which we receive, use, consult or otherwise process your personal data.

We will amend this privacy statement whenever necessary so that it is always up to date. We therefore advise you to return regularly to keep abreast of any changes. The privacy statement was last amended on 01.09.2022. You can also download and print this privacy statement here.

### Contact

For questions or comments about this privacy statement, please contact the Enovation Group Security Office at [eso@enovationgroup.com](mailto:eso@enovationgroup.com) or our Data Protection Officer at [dpo@enovationgroup.com](mailto:dpo@enovationgroup.com)

If you prefer to be contacted verbally, both can also be reached via our general number +31 (0)88 8 366 366.

# 1 WHO IS RESPONSIBLE FOR YOUR DATA PROCESSING?

Enovation Group is an internationally operating ICT organisation with a focus on collaboration and digital care. Enovation Group has several subsidiaries and locations across Europe and uses various (digital) marketing channels.

Enovation Group coordinates the development, sale and delivery of Enovation Group products and services and supplies these mainly, but not exclusively, to the Healthcare and Government sectors. Enovation Group acts as a processor within the meaning of the GDPR in the context of the implementation of its products and services. This privacy statement does not apply to that; this privacy statement focuses on the (personal) data that we process in our role as processor. For more information about the products and services that you purchase from us, please refer to your myEnovation environment or our service catalogue on the website.

The data controller for all processing of personal data, beyond the scope of providing products and services, is the legal entity belonging to the Enovation Group Holding bv, Rivium Quadrant 2, 2909 LE in Capelle aan den IJssel with KvK number 72234938.

Entities falling under the Enovation Group are :

Organization	Tradename	Adress	Postal code & City	Country	Chamber of Commerce
<b>ENOVATION B.V.</b>		Rivium Quadrant 2	2909 LC Capelle aan den IJssel	The Netherlands	24157738
<b>E.Novation UK Ltd.</b>	Enovation UK	Suite 17 Link 665 Business Centre	Haslingden Rossendale BB4 5HU	United Kingdom	06322590
<b>Enovation Belgium B.V.</b>		Noorderlaan 147, box 9	2030 Antwerpen	Belgium	0550.742.343
<b>Verklizan SARL</b>		148 Rue de L'Université	75007 Parijs	France	532478575
<b>Enovation Germany GmbH</b>		Hochstadenstraße 11	41469 Neuss	Germany	HRB12607
<b>Multisignaal B.V.</b>		Voorstraat 36	3241 EG Middelharnis	The Netherlands	24397234
<b>Centrum voor Publieke Innovatie - CPI B.V.</b>		Voorstraat 36	3241 EG Middelharnis	The Netherlands	24337846
<b>Funatic B.V.</b>	Enovation Funatic	Tractieweg 41 - Studio G	3534 AP Utrecht	The Netherlands	27291745
<b>Medimo B.V.</b>	Enovation Medimo	Soestdijkseweg Zuid 13	3732 HC De Bilt	The Netherlands	63056585

All named entities are subsidiaries of Enovation Group Holding, established in the Netherlands and can be reached within the scope of this privacy statement by e-mail: [eso@novationgroup.com](mailto:eso@novationgroup.com) or by phone: +31 (0)88 8 366 366.

Enovation Group B.V. is the parent company and as such provides various support services to its subsidiaries. All aforementioned data processors shall comply with the guarantees required by Enovation Group as parent company with a view to the proper, transparent and lawful use of personal data.

## 1.1 Use within the Enovation Group group

We can share the personal data we collect with other companies within Enovation Group when these companies share, complement or take over activities and business processes, unless prohibited by law. We do so in order to fulfil contractual obligations or when there is a justified business interest.

## 1.2 Third-party websites

This website contains links to third-party websites. Enovation Group has no control or authority over the linked third-party websites. A different privacy statement will apply to the use of these third party websites. This privacy statement of Enovation Group only relates to personal data obtained by Enovation Group. Enovation Group does not accept any responsibility or liability for (the operation and/or content of) third party websites.

## 2 WHAT PERSONAL DATA DO WE PROCESS AND WHY

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The AVG sets legal requirements for the processing of your personal data. Below, Enovation Group sets out what data we collect from you, when and why we use your data.

This privacy statement does not address the role of processor that Enovation Group fulfils in its services. In case you purchase services from Enovation Group and we process personal data on your behalf, please refer to your myEnovation environment. For additional information you can reach us through [eso@enovationgroup.com](mailto:eso@enovationgroup.com)

In the event that we process your personal data, or you suspect that we do, and you have a question about this, we will first refer you to the data controller (e.g. municipality, doctor or institution), unless of course that is us (if you apply for a job with us for example).

### 2.1 Data & purposes

#### 2.1.1 Contractual Obligations

If you enter into a service contract with us or intend to do so, we register your (company) name, gender, name, (invoice) address, Chamber of Commerce and VAT data as well as communication data such as e-mail address and telephone number. We also request your payment details such as your bank account number. We need this information to perform the services you purchase from us and to be able to invoice you.

We also use your e-mail address to send you maintenance and service announcements when we provide services to you. We may also contact you to ask questions about our services, within the framework of quality improvement. You cannot unsubscribe from the necessary maintenance and service messages.

#### 2.1.2 Service & Support

If you contact our Service & Support department, we will record the data required to process your request:

- Name and address details;
- Contact details for electronic communication, such as your e-mail address or healthcare mail address;
- Telephone number;
- Correspondence and call notes;
- Call recording in case of telephone contact - if this is the case, this will be made known prior to the call. The data from the telephone calls is also used for training, analysis and improving our operational processes.
- Depending on your request, the employee will be granted access to information necessary to process your request, for example, to the services you purchase and (contract) data.

We use this data to be able to respond as effectively as possible to your complaint, request or question. We save your question so that we can provide you with better assistance at a later date and analyse your customer satisfaction. We can also use this data to provide you with reports if we have agreed this in the contract.

### 2.1.3 Visiting the website

In order to make the website work (properly), we need certain information. This information includes, but is not limited to, your IP address, the type of browser (the computer program you use to view internet pages), the operating system you use and the pages you visit on our website. We do this to secure the website and services and to detect and prevent any abuse.

If you contact us via the contact form on our website, we will use the information you provide to have one of our staff answer your question. The information we request from you in this case is gender, name, e-mail address and telephone number.

### 2.1.4 Collaboration

To be able to collaborate during projects and consultations, we may approach you to request a (temporary) account on our MS365 environment. We will then ask you to register with an account for which we ask your name and e-mail address. These, together with the password assigned to you, will be stored to identify you when you log in.

### 2.1.5 Sociale Media

Enovation Group can be found on various social media, such as, Twitter, YouTube, Vimeo and LinkedIn.

If you follow us on social media or communicate with or about Enovation Group on social media, we might get access to (part of) your public profile data. When you share information about Enovation Group via social media, your data may become visible via those social media. Enovation Group itself also follows social media channels and thus gets access to data about you on social media.

Enovation Group keeps track of how often a certain post has been shared and "liked" via social media, in order to analyse its reach. We also record whether and which posts are made about Enovation Group via social media channels. In that context, we process the data necessary so that we can optimise the content of our social media activities as much as possible, such as the viewed and posted content and messages related to Enovation Group and metadata stored in the platform.

The purpose of this processing is to analyse the reach of the social media activities and to improve our customer satisfaction. In our Cookie Policy you can find more information about which social media cookies we use.

The jobs, articles and videos that you view on our website can also be shared via social media using buttons. To make these buttons work, we use cookies from the social media parties concerned, so that they recognise you when you want to share a vacancy or video. Enovation Group and the social media party concerned are each separately responsible for this. Enovation Group has no insight into the data collected by other parties and has no influence on the way your data is processed (further) by these parties.

Please read the privacy statement of the social media party concerned to find out how they process your (personal) data:

- X (voorheen Twitter): [X Privacy Policy \(twitter.com\)](#)
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- YouTube: <https://policies.google.com/privacy>
- Vimeo: <https://vimeo.com/privacy>

### 2.1.6 Cookies

We use cookies and similar technologies to improve the user-friendliness of our websites, to secure the websites, to optimise your experience of our services and to recognise you when you return. In our Cookie Policy you can read more about which cookies are placed for which purposes and by which parties. You can always withdraw your consent through the cookie settings on our websites, excluding the mandatory cookies to assure the correct performance of the website.

We use cookies and techniques that are similar to cookies, such as link tracking. Link tracking allows us to see if you open our emails and to recognise you when you click through to the websites from our emails.

### 2.1.7 Newsletters

You can subscribe to newsletters on our websites. The newsletter contains information about Enovation Group products, services and events.

If you have signed up for the newsletters you will receive both newsletters concerning the services you have purchased and about products and services directly related to your purchased services. You can always indicate that you no longer wish to receive the newsletters.

### 2.1.8 Vacancies & Applications

As soon as you apply for a vacancy, we will ask you - depending on the vacancy in question - to provide various details that will be used to process your application, such as:

- Name, address and place of residence;
- Telephone number;
- E-mail address;
- Gender;
- Date of birth;
- (Highest) education;
- Curriculum vitae;
- Motivation (letter);
- LinkedIn profile (optional);



- Availability.

In addition, we process the data that you provide us with if you mention this in your CV or motivation letter. These data are used to assess your suitability for the vacancy in question and to contact you about the course of the application procedure.

In case Enovation Group offers you a job, your data will also be used to prepare the offer. In case the offer is accepted, your data will be used to prepare and execute the employment contract.

In the event that no employment contract is made, and only if you have given your consent, we will record your data in our system so that we can possibly approach you for a future position at a later date.

### 2.1.9 Assessments

Depending on the job level, an assessment (internal or external) may be part of the application procedure. The results will be processed in order to assess whether you meet the job requirements.

### 3 HOW LONG DO WE KEEP YOUR DATA?

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Enovation Group does not retain personal data any longer than is necessary for the purpose for which it was collected or processed, unless a longer statutory period applies or if a dispute or (legal) case is pending or imminent. The storage periods vary according to the type and purpose of the (personal) data concerned.

The retention periods as referred to above and in this privacy statement do not relate to the role of processor that Enovation Group fulfils for its services. If your healthcare professional, local authority or other data controller purchases services from Enovation Group and we process personal data on behalf of and for a client, we will always refer you first to our client, your data controller.

Enovation Group has laid down its policy with regard to retention periods in its Corporate Quality Management System. If you have a specific question about one or more of these retention periods, please contact the Enovation Group Security Office at [eso@novationgroup.com](mailto:eso@novationgroup.com).

## 4 THIRD PARTIES AND TRANSFERS

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This privacy statement does not address the role of processor that Enovation Group performs for its services. If Enovation Group as data controller engages a processor, it shall enter into an adequate processor agreement with that processor, which shall include appropriate technical and organisational security measures. In the event that Enovation Group engages an independent data processor, Enovation Group shall make every effort to agree on appropriate security measures.

Furthermore, Enovation Group provides data to third parties with consent or if we are obliged to do so by law or regulation, as a result of legal proceedings, an authorised order or command issued by a governmental body and/or in the event that we consider it necessary to protect our legitimate interests and/or the interests of third parties.

### 4.1 Third countries outside the European Economic Area

In some cases, it is necessary for Enovation Group to transfer your personal data to a party that is established in a country outside the European Economic Area (EEA). The EEA consists of the countries of the European Union, Liechtenstein, Norway and Iceland. Enovation Group will only provide your personal data to a party in a country outside the EEA if that country provides adequate protection measures or if we have concluded a so-called EU model agreement and appropriate arrangements for the protection of personal data with the party to whom we provide your personal data.

If you have a specific question about one or more of these third parties, please contact the Enovation Group Security Office at [eso@enovationgroup.com](mailto:eso@enovationgroup.com).

## 5 WHAT ARE YOUR RIGHTS?

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If Enovation Group acts as a data controller, the AVG grants you, the data subject, a number of rights which we will explain below.

This privacy statement does not address the role of processor which Enovation Group fulfils for its services. If we process your personal data on behalf of one or more of our customers, you should always first address your question to the processor. If the request is made directly to us, we will, if possible, forward your request to the data controller for processing, unless we ourselves are the data controller.

If you contact us with a request for one or more of the above rights, we are entitled to ask you to identify yourself adequately. If you wish to exercise any of the rights set out below, or you require further information and support in relation to any of these rights, please contact our Security Office at [eso@enovationgroup.com](mailto:eso@enovationgroup.com) where we will be happy to facilitate your enquiry.

### 5.1 Insight and correction

If you want to know which categories of personal data Enovation Group processes from you, at

which location, categories of recipients, and for which purposes, you can contact our Security Office at [eso@novationgroup.com](mailto:eso@novationgroup.com). You can also request correction of factually incorrect data. Enovation Group will respond to your request as soon as possible, but at the latest within four (4) weeks. In principle, the processing of these requests is free of charge for you.

## 5.2 Objection

You can always object to the processing of your personal data, such as, but not limited to, the use of your personal data for (direct) marketing actions by contacting our Security Office at [eso@novationgroup.com](mailto:eso@novationgroup.com). The emails or other messages sent by Enovation Group always include an unsubscribe option. If you use this option, you will no longer receive these messages. You cannot unsubscribe from essential service and maintenance messages.

## 5.3 Deletion

If you want Enovation Group to delete your personal data and/or your account, you can request this by sending an e-mail to our Security Office at [eso@novationgroup.com](mailto:eso@novationgroup.com). It is possible that some personal data will be retained after the deletion request, for example if there is a legal obligation to retain the data. A deletion request may be refused because of ongoing obligations, for example. In this case, you will always be contacted for an explanation.

## 5.4 Restriction of processing

If you have legitimate reasons to request restriction of processing, for example because you question the factual accuracy of personal data processed by Enovation Group, or you have objected to the processing of personal data, you can request this by sending an e-mail to our Security Office at [eso@novationgroup.com](mailto:eso@novationgroup.com).

## 5.5 Data portability

If we process your personal data after you have given your permission or because the data are processed in order to execute a contract concluded with you, you have the right to request to receive the personal data in question that you have provided to us in a structured, common and machine-readable form. You can request this by sending an e-mail to our Security Office via [eso@novationgroup.com](mailto:eso@novationgroup.com).

## 5.6 Withdrawal of consent

If the processing of your personal data is based on your (explicit) consent, you have the right to withdraw this consent at any time, without prejudice to the lawfulness of the processing based on the consent before the withdrawal.

## 5.7 Complaint

If you have a complaint about the use or other forms of processing of personal data by Enovation Group, you are entitled to lodge a complaint with the competent supervisory authority or appeal to the courts.

The group to which all Enovation Group entities belong has its headquarters in Capelle aan den IJssel, the Netherlands. Therefore, the Authority for the Protection of Personal Data is the leading authority.

Country	Supervisory Authority	Contact details
The Netherlands	<a href="#">Autoriteit Persoonsgegevens (AP)</a>	T : +31 (0)88 - 1805 250 Site : <a href="https://autoriteitpersoonsgegevens.nl/een-tip-of-klacht-indienen-bij-de-ap">https://autoriteitpersoonsgegevens.nl/een-tip-of-klacht-indienen-bij-de-ap</a>
United Kingdom	<a href="#">Information Commissioner's Office (ICO)</a>	T : +44 (0)303 123 1113 Site : <a href="https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/">https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/</a>
Germany	<a href="#">Federal Commissioner for Data Protection and Freedom of Information (BfDI)</a>	T : +49 (0)228 99 77 99-0 Site : <a href="https://formulare.bfdi.bund.de/lip/form/display.do?%24context=491AC7AF8E1047248B70">https://formulare.bfdi.bund.de/lip/form/display.do?%24context=491AC7AF8E1047248B70</a>
Belgium	<a href="#">Gegevensbeschermingsautoriteit</a>	T : +32 (0)2 274 48 00 of +32 (0)2 274 48 35 Site : <a href="https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen">https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen</a>
Spain	<a href="#">Spanish Data Protection Authority (aepd)</a>	T : + 34 901 100 099 - 912 663 517 Site : <a href="https://www.aepd.es/es/preguntas-frecuentes/13-reclamaciones-ante-aepd-y-ante-otros-organismos-competentes/FAQ-1301-como-puedo-interponer-una-reclamacion-si-han-vulnerado-mis-datos-de-caracter-personal">https://www.aepd.es/es/preguntas-frecuentes/13-reclamaciones-ante-aepd-y-ante-otros-organismos-competentes/FAQ-1301-como-puedo-interponer-una-reclamacion-si-han-vulnerado-mis-datos-de-caracter-personal</a>
France	<a href="#">Commission Nationale de L'Informatique et de Libertés (CNIL)</a>	T : +33 (0)1.53.73.22.22 Site : <a href="https://www.cnil.fr/fr/contacter-la-cnil-standard-et-permanences-telephoniques">https://www.cnil.fr/fr/contacter-la-cnil-standard-et-permanences-telephoniques</a>
Sweden	<a href="#">Integritetsskyddmyndighet en (IMY)</a>	T : +46 (0)8-546 44 000 Site <a href="https://www.imy.se/en/about-us/contact-us/">https://www.imy.se/en/about-us/contact-us/</a>

## 5.8 your data via your myEnovation Account

You can also view and manage your personal data yourself in your myEnovation Account.



enovation®  
care to connect