

**DATA PROTECTION POLICY**  
**of Globis Consulting B.V. located in Eindhoven**  
**Implementing the AVG (EU) 2016/679 version 20180524**

**Article 1**  
**General**

The following definitions are used in this policy:

1. *Globis Consulting BV*: the trading name of the company with limited liability Globis Consulting B.V., registered at the Kamer van Koophandel in Eindhoven under number BV17098279. This policy also applies to allied companies in the group operating under the same management.
2. *AVG*: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
3. *Personal Data*: all data that can be associated with an identifiable person.
4. *Processing of Personal Data*: every whole or partial action on personal data, and in any case the collection, recording, ordering, storage, transformation, changing, querying, consulting, usage, sending, publication or transmission or making available in any form, merging, cross referencing, screening, erasure, or destruction of data.
5. *Data Controller*: the natural person, the legal entity or other directing body that, alone or together with others, defines the goals and resources used for the processing of personal data. In the case of this policy, Globis Consulting BV.
6. *Data Processor*: the natural person, legal entity or other, which processes data on behalf of the data controller, without this being under their own direct authority. All employees of Globis Consulting BV are explicitly considered to be Data Processors due to the nature of the consulting business.
7. *Data Subject*: The identifiable person to whom the personal data relates.
8. *Information Commissioner*: the Dutch organisation responsible for registration and enforcement of the AVG: The Dutch Data Protection Authority also known as Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ DEN HAAG

## **Article 2**

### **Applicable Law**

1. Globis Consulting BV is located with its headquarters and major operations in the Netherlands, and is therefore be subject to Dutch law and the AVG.

## **Article 3**

### **Who We Are, and How to Contact Us**

1. The data controller is:

Globis Consulting B.V.,  
Weegschaalstraat 3,  
5632CW, Eindhoven  
The Netherlands

2. The primary contact for all operational matters relating to data protection within Globis Consulting BV is:

Name:           **Ray Hunter**  
Tel:              +31 620 363864  
Mail:             at the above address  
Email:           Ray.Hunter@globis.net

Persons whose data is stored and processed by Globis Consulting BV (data subjects) have the certain rights under the AVG:

In order to exercise these rights the Data Subject should:

1. Make his or her request in writing to the Data Controller in writing is defined as a written letter sent by the public postal service. Email is not considered a valid medium for this sort of request due to its inherently insecure transport mechanism.
2. Be aware that where repeated requests are made, Globis Consulting BV may apply an administration charge for handling the request. The current administration charge is €95 per hour, based on actual hours worked to process the request, to be paid personally in cash to an officer of Globis Consulting BV, or by making a transfer to the Globis Consulting BV bank account at Rabobank in Eindhoven, account number NL92 RABO 0113 2079 72. Globis Consulting BV reserves the right to review this general charge if special cases arise. Globis Consulting BV does not accept cash or other payments by post.
3. Provide reasonable proof of identity that they are the Data Subject in question. Globis Consulting BV will accept the following forms of proof: a colour photocopy of; a passport, an identify card issued by a recognised government, or a standard driving licence which includes a photograph. The document of proof must contain a signature, which matches the signature on the request.

If a request is received and the conditions above are met, Globis Consulting BV will take all reasonable actions to ensure that the request is fulfilled subject to the following conditions:

1. The data or reply should be provided to the Data Subject in hard copy form unless the Data Subject has agreed otherwise.
2. The request should be fulfilled within 4 weeks.
3. No data relating to any other person can be divulged unless the consent of that person is obtained in writing first.

#### **Article 4**

##### **Blanket Ban on Processing Special Categories of Personal Data**

Whilst Globis Consulting BV shall process and store personal data, it shall never process or store any personal data that is defined as belonging to a "special category of personal data" under the AVG. That is, Globis Consulting BV shall not store or process details of the Data Subject's:

1. Racial or ethnic origin.
2. Political opinions.
3. Religious or philosophical beliefs or beliefs of a similar nature.
4. Trade union membership.
5. Genetic data, biometric data for the purpose of uniquely identifying a natural person
6. Data concerning health or data concerning a natural person's sex life or sexual orientation

Globis Consulting BV shall not store or process details of the Data Subject's:

7. Commission or alleged commission of a criminal offence.
8. Proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.

#### **Article 5**

##### **Permission to Carry Out Processing of Personal Data**

1. Before carrying out any processing of personal data, all Data Processors shall first obtain explicit permission to proceed from the Data Controller.
2. Data Processors shall adhere at all times to the Data Protection Policy of Globis Consulting BV unless prevented from doing so by law.

3. In case of any doubt about matters arising from the processing of personal data, a Data Processor should cease processing and obtain advice and clarification from the Data Controller before proceeding.
4. If the Data Controller instructs a Data Processor to cease processing of personal data or provides other instructions relating to the processing of personal data, the Data Processor must take all reasonable actions to implement and obey these instructions in a timely manner.

## **Article 6**

### **Adherence to the Data Processing Principles**

Globis Consulting BV shall process and store personal data according to the principles laid down in Chapter 2 of the AVG.

In Particular:

1. Globis Consulting BV relies on the following lawful basis for processing:
  - a. The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
  - b. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
  - c. processing is necessary for compliance with a legal obligation to which the controller is subject;
  - d. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
  - e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
  - f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
2. Globis Consulting BV shall not provide data to third parties unless it is due to a legal obligation to inform a properly authorised organisation, or for carrying out subcontracted activities of Globis Consulting BV in line with this data protection policy.
3. Globis Consulting BV shall not obtain personal data from Third Parties unless it is due to a legal obligation to inform a properly authorised organisation, or for carrying out subcontracted activities of Globis Consulting BV in line with this data protection policy. An example would be tax calculations performed by our accountants used for our own internal salary administration.

4. Globis Consulting BV does not provide services to or intended for use by minors. Consistent with the requirements of the Children's Online Privacy Protection Act, if we learn that we have received any information directly from a child under age 13 without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our services.

## **Article 7**

### **How and Why We Use Cookies**

1. Cookies are small text files that are sent to or accessed from a web browser or a computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and activities conducted while using the Services. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies and web beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
2. How Globis Consulting BV Uses Data Collection Technology: Data Collection Technology helps us improve your experience of the Services by, for example, storing website language preferences, so the user does not have to select it each time they use the application or set site, compiling statistics about use of the application and web site, helping us analyse technical and navigational information about the application and web site, and detecting and preventing fraud.
3. Our website and applications use the following cookies:
  - a) Strictly necessary cookies, which are required for the operation of the application and web site. Without them, for example, users would not be able to register or log in for the web site and applications that we offer.
  - b) Analytical/performance cookies, which allow us to recognize and count the number of visitors, to learn how visitors navigate the services and to help us to improve the way web site or application functions.
  - c) Functionality cookies, which are used to recognize a user when they return to the application or web site.
4. The User's Ability to Control Cookies: Some web browsers (including some mobile web browsers) provide settings that allow the user to control or reject cookies or to alert them when a cookie is placed on their Device. Users also may be able to reject Device identifiers by activating the appropriate setting on your Device. Although users are not required to accept cookies or mobile device identifiers, if the user blocks or rejects them, they may not have access to all features available through the web site or application.

## Article 8

### **How and Why We Process Personal Data: Definitions of Acceptable Personal Data & Processing Activities**

**Standard Data Classes** shall be used as a basis for all processing of personal data, including the following classes: Name, Christian name, Initials, Title, Sex, Birth Date, Address, Postcode, Post Town, Telephone number, and similar data necessary for communication such as bank and giro account numbers of the Data Subject, plus an administration identifier that has no function other than as a reference to the above items. Additional data classes necessary shall be defined to fulfill the purpose of the processing.

#### **1. Handling of Job Applicants**

**Purpose of Processing** - to determine if a job applicant is suitable to fulfil a function within Globis Consulting BV.

**Data subjects** are restricted to – persons who have applied for a function with Globis Consulting BV.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, courses planned and completed, function that has been applied for, data on current function and termination conditions, data on previous functions and termination conditions, other data necessary to determine the suitability for performing a function, other legal data necessary to perform the function (e.g. work permit).

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to determine whether the job application is suitable to perform the required function.

**Data retention** – the personal data shall be deleted within four weeks after the end of the application process, unless the data subject gives permission in which case they shall remain on file for a maximum of one year.

#### **2. Temporary Workers**

**Purpose of Processing** - to register temporary workers who are available for placing under contract at a customer site.

**Data subjects** are restricted to – persons who are available to be placed as temporary workers by Globis Consulting BV at customer site.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, courses planned and completed, preferred function, data on functions available at clients, data on current previous placements and termination conditions, previous work experience other data necessary to determine the suitability for placing at a customer site, other legal data necessary required for placing at a customer site (e.g. work permit).

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to determine whether the person is suitable to be placed at a

customer site, and customers who have a potential requirement matching the data subject for so far as that is necessary.

**Data retention** – the personal data shall be deleted upon request of the data subject, or at most they shall remain on file for a maximum of two years after the last day of work with Globis Consulting BV, unless required for fulfilling another law.

### **3. Personnel Administration**

**Purpose of Processing** - to provide personnel administration for employees of Globis Consulting BV.

**Data subjects** are restricted to – persons who are or have been employed by Globis Consulting BV.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, courses planned and completed, current and previous functions and termination conditions, time registration and whether present or absent (but NOT the reason of sickness), related family data (e.g. emergency contact), other legal data necessary for fulfilling mandatory personnel functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out personnel functions, and relevant unions and labour organisations.

**Data retention** – the personal data shall remain on file for a maximum of two years after the last day of work with Globis Consulting BV, unless required for fulfilling another law.

### **4. Salary Administration**

**Purpose of Processing** - to provide salary administration for employees of Globis Consulting BV.

**Data subjects** are restricted to – persons who are or have been employed by Globis Consulting BV.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, data needed to calculate and pay salary and bonuses, data needed to calculate and pay tax, data on contract conditions, other legal data necessary for fulfilling mandatory salary functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out salary calculation and payment functions, which includes the Belastingdienst, GAK, banks, and accountants.

**Data retention** – the personal data shall remain on file for a maximum of two years after the last day of work with Globis Consulting BV, unless required for fulfilling another law.

### **5. Redundancy & Other Payments After Dismissal**

**Purpose of Processing** - to provide payment administration for employees of Globis Consulting BV after they have been dismissed.

**Data subjects** are restricted to – persons who are or have been employed by Globis Consulting BV and who have a right to payments after dismissal.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, data needed to calculate and make compensation and tax payments after dismissal, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out calculation and payment functions, which includes the Belastingdienst, GAK, banks, and accountants.

**Data retention** – the personal data shall remain on file for a maximum of two years after the relevant last payment from Globis Consulting BV, unless required for fulfilling another law.

## **6. Pension & Early Retirement**

**Purpose of Processing** - to provide payment administration for employees of Globis Consulting BV after they have retired.

**Data subjects** are restricted to – persons who are or have been employed by Globis Consulting BV and who have a right to a old age pension or other payments due to early retirement.

**Data classes** are restricted to –standard data classes, plus nationality, place and date of birth, data needed to calculate and make pension and tax payments after retirement, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out calculation and payment functions, which includes the Belastingdienst, GAK, banks, and accountants, plus other organisations such as accompany pension scheme who are responsible for giving advice on old age pensions

**Data retention** – the personal data shall remain on file for a maximum of two years after the relevant last payment from Globis Consulting BV, unless required for fulfilling another law.

## **7. Subscriptions**

**Purpose of Processing** - to provide administration for subscribers of services provided by Globis Consulting BV.

**Data subjects** are restricted to – persons who are or have been subscribers to services provided by Globis Consulting BV.

**Data classes** are restricted to –standard data classes, data needed to calculate and track subscription payments, the reason for termination of a subscription, the type and nature of the subscription.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out administration of subscriptions.

**Data retention** – the personal data shall remain on file for a maximum of two years after the termination of the subscription from Globis Consulting BV, unless required for fulfilling another law.

## **8. Debtors & Creditors**

**Purpose of Processing** - to provide administration of debtors and creditors of Globis Consulting BV and collection and payments of debts.

**Data subjects** are restricted to – persons who are or have outstanding debts to or credits from Globis Consulting BV.

**Data classes** are restricted to –standard data classes, data needed to track income and expenditure, data needed to maintain contact with creditors and debtors, data needed to calculate and track debt and credit payments, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out administration of debtors and creditors.

**Data retention** – the personal data shall remain on file for a maximum of two years after the relevant debtor credit has been paid off, unless required for fulfilling another law.

## **9. Clients and Sub Contractors**

**Purpose of Processing** - to provide administration of the provision of goods and services to and ordering of goods and services from Globis Consulting BV.

**Data subjects** are restricted to – persons who are or have provided to or received services from Globis Consulting BV.

**Data classes** are restricted to –standard data classes, data needed to track provision and ordering of goods and services, data needed to maintain contact with suppliers and clients, data needed to calculate and track income and expenditure, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out administration of suppliers and clients.

**Data retention** – the personal data shall remain on file for a maximum of two years after the transaction has been completed unless required for fulfilling another law.

## **10. Hiring and Leasing of Property and Goods**

**Purpose of Processing** - to provide administration hiring property and goods to and leasing of property and goods from Globis Consulting BV.

**Data subjects** are restricted to – persons who are or have hired to or leased from Globis Consulting BV.

**Data classes** are restricted to –standard data classes, data needed to execute a hire or lease contract, data needed to calculate and track income and expenditure, data related to requesting a hire subsidy, handling of disputes, data relating to maintenance of the goods and property, internal management activities, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out administration of hiring and leasing of property and goods..

**Data retention** – the personal data shall remain on file for a maximum of two years after the hire has been completed, or five years after the ending of a hire subsidy, unless required for fulfilling another law.

## **11. Students and Course Attendees**

**Purpose of Processing** - to provide administration of students and course attendees for courses provided by Globis Consulting BV.

**Data subjects** are restricted to – persons who have or will attend a course given by Globis Consulting BV.

**Data classes** are restricted to –standard data classes, nationality, date and place of birth, data necessary for the health of the students during the course, type and content of the course, organisation and provision of instruction material, data required to calculate and collect course fees, other legal data necessary for fulfilling mandatory functions.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out administration of students and course attendees,

**Data retention** – the personal data shall remain on file for a maximum of two years after the course has been completed, unless required for fulfilling another law.

## **12. Archives**

**Purpose of Processing** - to provide archiving for research and statistical purposes for Globis Consulting BV. Globis Consulting BV will strive were possible to remove unnecessary or excessive personal data from the archive material before archiving.

**Data subjects** are restricted to – the data contained in the archive material.

**Data classes** are restricted to – the data contained in the archive material. Data shall be anonymised or converted to tokens that cannot be traced back to a person as soon as practicably possible.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to maintain the archive or conduct statistical research.

**Data retention** – the personal data shall remain on file only for as long as this is absolutely required for the archive or for the statistical research.

### **13. Scientific Research and Statistics**

**Purpose of Processing** - to provide specific internal statistical research initiated and for use by Globis Consulting BV. Globis Consulting BV will strive where possible to remove unnecessary or excessive personal data from the archive material before archiving.

**Data subjects** are restricted to – the data necessary to perform a particular piece of research.

**Data classes** are restricted to – standard data classes plus the data specifically obtained during the research process. Data shall be anonymised or converted to tokens that cannot be traced back to a person as soon as practicably possible.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV carry out the scientific or statistical research.

**Data retention** – the personal data shall remain on file only for as long as this is absolutely required for the research and for a maximum of six months after they have been obtained.

### **14. Document Management**

**Purpose of Processing** - to provide management of documents published by Globis Consulting BV for the purpose of production, communication, registration, review, internal management, and handling of disputes.

**Data subjects** are restricted to – the persons who produce, communicate, register, review, and internally manage documents, and those who handle of disputes or are otherwise involved in the publication and management of documents.

**Data classes** are restricted to – standard data classes plus the data specifically required for production, communication, registration, review, internal management, and handling of disputes.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out document management, and those involved on the customer side with reviewing documents associated with this particular customer.

**Data retention** – the personal data shall be removed within five years of being recorded, unless they are required for fulfilling another law.

### **15. Network Systems**

**Purpose of Processing** - to enable provision or access to network services and to provide security and management of the network.

**Data subjects** are restricted to – the persons who access or attempt to access the network service.

**Data classes** are restricted to – standard data classes plus the data specifically required to identify network users, to determine the access authority, and for sending and receiving electronic messages to the users.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to provide and manage network services.

**Data retention** – the personal data shall be removed within 6 months of being obtained, or within two years after the end of the relationship for the service for which data was required.

## **16. Computer Systems**

**Purpose of Processing** - to enable provision or access to computing services to provide security and management of these services.

**Data subjects** are restricted to – the persons who access or attempt to access the computing service.

**Data classes** are restricted to – standard data classes plus the data specifically required to identify computing users, making back-ups, historical use data, technical and operating system parameters, user profiles.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to provide and manage computing services.

**Data retention** – the personal data shall be removed within 6 months of being obtained, unless required to fulfil another law.

## **17. Communication Equipment**

**Purpose of Processing** - to enable provision or access to communication equipment to provide security and management of this equipment, to provide connectivity for the sending of messages.

**Data subjects** are restricted to – the persons who can access or attempt to access the communication equipment.

**Data classes** are restricted to – the data necessary to enable communications, and historical data over when the connection was established or ended.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to provide and manage communication equipment.

**Data retention** – the personal data shall be removed within 6 months of being obtained, unless required to fulfil another law.

## **18. Access Control**

**Purpose of Processing** - to provide control of access to buildings and information systems of Globis Consulting BV by providing identification of individuals and allowing internal control and company security.

**Data subjects** are restricted to – the persons who access or attempt to access buildings and information systems of Globis Consulting BV.

**Data classes** are restricted to – standard data classes plus the data specifically required to identify individuals and access rights, whether access has been given, and data for the use as passwords.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to control access to buildings and information systems.

**Data retention** – the personal data shall remain on file for a maximum of six months after the revocation of access rights, or for fulfilling another law.

## **19. Other Internal Management**

**Purpose of Processing** - to provide specific internal management tasks of Globis Consulting BV for supporting the normal flow of business.

**Data subjects** are restricted to – persons engaged in providing services on behalf of Globis Consulting BV.

**Data classes** are restricted to – standard data classes plus task and functions within the organisation, the work performed or to be performed, time recording, absence due to sickness, holidays, courses part time working (but not the sort of sickness); materials, clothes, facilities or assets that have been provided to perform work.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to carry out internal management of normal business processes.

**Data retention** – the personal data shall remain on file for a maximum of six months after the work has been completed, unless required to fulfil a legal requirement to keep proper records of the flow of business.

## **20. Visitor Registration**

**Purpose of Processing** - to provide a record and control of visitors to Globis Consulting BV.

**Data subjects** are restricted to – the persons visiting Globis Consulting BV.

**Data classes** are restricted to – standard data classes plus the person and organisation being visited, reason of the visit, time of entry and exit, identification provided by the visitor.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to register and control visitors to Globis Consulting BV.

**Data retention** – the personal data shall remain on file for a maximum of six months after the visit, unless required to fulfil another law.

## **21. Complaints and Legal Procedures**

**Purpose of Processing** - to record and manage handling of complaints, settlement of disputes, and legal cases that have been brought against Globis Consulting BV.

**Data subjects** are restricted to – those persons who have made a complaint or started a legal case against Globis Consulting BV.

**Data classes** are restricted to – standard data classes plus the facts of the complaint, dispute or case; data to allow organisation and management of handling of complaints, disputes, or cases other data required to handle the complaint, dispute, or case.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to record and manage handling of complaints, disputes, and legal cases.

**Data retention** – the personal data shall remain on file for a maximum of two years after settlement, or, unless required to fulfil another law.

## **22. Communication & Contact Data**

**Purpose of Processing** - to facilitate communication with clients and potential clients, for sending information of services and products available from Globis Consulting BV, recording of the material that has been sent, maintenance of contact with Globis Consulting BV.

**Data subjects** are restricted to – those persons who have made use of, or are likely to make use of, products and services of Globis Consulting BV.

**Data classes** are restricted to – standard data classes plus a record of the material that has been sent, and other details necessary for maintaining contact and communication.

**Disclosures** are restricted to – those parties, which are necessary for Globis Consulting BV to maintain contact and to communicate with clients and potential clients.

**Data retention** – the personal data shall be removed if requested by the data subject, or within one year from the date that the relationship with the data subject is broken.