



MOMENTUM

Momentum EMEA Privacy Policy

This Privacy Policy describes the privacy practices of Momentum EMEA (legally registered as Horizon Telecom B.V. in the Dutch Trade Register under number 61159417 ("**Momentum EMEA**", "**we**" or "**our**") and applies to all online and offline types of personal data received by Momentum EMEA from:

- (potential) suppliers, customers, contractors, clients, job applicants and other relations of Momentum EMEA;
- visitors to the website of Momentum EMEA;
- recipients of information from Momentum EMEA;
- all other persons in contact with Momentum EMEA;

hereinafter together also referred to as "**you**" and "**your**".

Momentum EMEA is a professional IT service provider. When offering our data and telecommunication services, we process personal data. Processing personal data is (technically) necessary for providing our services.

This Privacy Policy sets out how Momentum EMEA handles the personal data it processes. It also sets out the purposes for which we process personal data and your rights as a data subject.

Definitions

Momentum EMEA defines the purposes and means of the processing of personal data and qualifies therefore as the "controller" within the meaning of the General Data Protection Regulation ("GDPR").

"Personal data", as referred to in the GDPR, are data that can be directly or indirectly traced back to a natural person. In the GDPR, the natural person is referred to as the "data subject".

In the GDPR, the handling of personal data is referred to as "processing". Processing is understood as everything you can do with personal data, such as collecting, recording, organizing, structuring, storing, updating or modifying, retrieving, consulting, using, providing by transmission, distributing, making available, aligning, combining, shielding, deleting and destroying.

Contact information

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<https://gomomentum.eu/nl>

Our Privacy Officer can be contacted at security@gomomentum.eu

Which personal data do we process?

Momentum EMEA processes personal data when our services are used and/or because data are disclosed to Momentum EMEA.

Here are the types of information we collect:

- Information you give us: we receive and store any information you provide in relation to Momentum EMEA services. You can choose not to provide certain information but then you might not be able to take advantage of many of our Momentum EMEA services.
- Automatic information: we automatically receive and store certain types of information when you use Momentum EMEA services, such as information about your use, including your interaction with services available through Momentum EMEA services. Like many service providers with websites, we use "cookies" and other unique identifiers and we obtain certain types of information when your web browser or device accesses Momentum EMEA services and other content served by or on behalf of Momentum EMEA on other websites. Some cookies are essential for the proper functioning of the website, while others are used for analytics or marketing purposes and are only set with your consent. For more details, including how to manage your preferences, please refer to our Cookie banner.
- Information from other sources: we might receive information about you from other sources, such as updated delivery and address information from other carriers, which we use to correct our records.

The overview below shows the personal data that Momentum EMEA processes:

- First and last name;
- Sex;
- Address;
- Telephone number;
- Email address;
- IP address;
- Other personal data that are actively disclosed to us, for example by filling out a contact form on our website, or uploading a resume when responding to a vacancy, or by correspondence or telephone;
- Information about activities on our websites and portals;
- Web browser and device type;
- Bank account number if we send invoices or if invoices are sent on our behalf or if payments are being made;
- Data about purchased services if these are recorded in our systems;
- Personal data (such as voice, image and videos) displayed in our provided telecommunication services.

Minors

Our website and/or service does not intend to collect personal data of visitors to our website who are 16 years old or younger, unless they have the permission of their parents or guardian. However, we are unable to check whether a visitor is older than 16. We therefore advise parents to be involved in their children's online activities, in order to prevent personal data of minors being collected without their parents' consent. If you are convinced that we have collected personal data of a minor without such consent, please contact us at security@gomomentum.eu, and we will remove those personal data.

Lawfulness of processing

The GDPR requires a legal basis for the processing of personal data (article 6 GDPR). Our legal basis varies depending on the specific purpose for which we use personal data:

- If the processing is necessary for the performance of an agreement to which you are a party, or to take measures at your request prior to the conclusion of an agreement. This includes when we use your personal data to take and handle orders, deliver products and services, process payments, and communicate with you about our offerings;
- Our legitimate business interests and the interests of our customers when we improve Momentum EMEA services, when we detect and prevent fraud and abuse in order to protect the security of our customers, ourselves, or others. Provided that the interests or rights of the data subject do not outweigh the legitimate interests of Momentum EMEA or the third party;
- Your consent when we ask for your consent to process your personal data for a specific purpose that we communicate to you. Such consent should be free, specific, informed and unambiguous. When you consent to our processing your personal data for a specified purpose, you may withdraw your consent at any time and we will stop processing your personal data for that purpose;
- Compliance with a legal obligation when we use your personal data to comply with laws. For instance, we collect seller place of establishment and bank account information for identity verification purposes.

Marketing, cookies, and use of tracking technologies

When you provide consent as required, we may send you information about Momentum EMEA products and services, special offers and similar information.

We may place cookies or use similar technologies in our services and in email communications, in accordance with our cookie policy and explained in more detail in the below "Cookies or similar technologies we use" section. We may access data stored on your device such as cookies or similar technologies, regarding your use and interaction with services and analyse your use and navigation of the using techniques such as machine learning to detect and prevent fraudulent, deceptive or illegal activities or misuse of the services and to improve our services and the user experience. On other occasions where we ask your consent, we will use the data for the purposes we explain at that time. In cases where your consent is required to process data, you may withdraw your consent to such activities at any time. If the content or data you store in Momentum EMEA services contains personal information of other people, you must be legally permitted to disclose that personal information to Momentum EMEA. Wherever we rely on your consent, you can always withdraw that consent. In some cases we may send you direct marketing without your consent, relying on our legitimate interests if you are an existing customer. You have the absolute right to opt out of direct marketing, or profiling that we carry out for direct marketing, at any time by update your preferences in your Momentum EMEA ID profile; update your preferences in your specific website or accounts; clicking the 'Unsubscribe' link at the bottom of our marketing emails; or contact us using the details provided within this privacy policy. Where we process your personal data on the basis of legitimate interests, you can object to this processing in certain

circumstances. In such cases, we will stop processing your personal data unless we have compelling legitimate grounds to continue processing or where it is necessary for legal reasons.

Purposes for which Momentum EMEA processes your personal data

We process your personal information to operate, provide, and improve the Momentum EMEA services that we offer our customers. These purposes include:

- Delivery of services: we use your personal information to provide our services, process payments, and communicate with you about orders, products and services, and promotional offers.
- Provide, troubleshoot, and improve Momentum EMEA services: we use your personal information to provide functionality, analyse performance, fix errors, secure and improve usability and effectiveness of the Momentum EMEA services.
- Recommendations and personalisation: we use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalise your experience with Momentum EMEA services.
- Provide voice, image and other telecommunications services: when you use voice, image and camera services, we process your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our Momentum EMEA services.
- Fraud prevention and credit risks: we process personal information to prevent and detect fraud and abuse in order to protect the security of our customers, Momentum EMEA Europe, and others. We may also use scoring methods to assess and manage credit risks.
- Comply with legal obligations: in certain cases, we collect and use your personal information to comply with laws. For instance, we collect from sellers' information regarding place of establishment and bank account information for identity verification and other purposes.
- Communicate with you: we use your personal information to communicate with you in relation to Momentum EMEA services via different channels (e.g., by phone, email, chat).
- Purposes for which we seek your consent: we may also ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.
- Account creation and management: we use your information to create and maintain your Momentum EMEA account and authenticate your identity.
- Recruitment and selection: if you apply for a position with Momentum EMEA, we process your application data for recruitment, selection, and contact purposes.

Automated decision-making

Momentum EMEA does **not** decide on matters that may have serious personal consequences on the basis of automated processing, meaning decisions that are made by computer programmes or systems without the intervention of a human being (for example an employee of Momentum EMEA).

How long do we retain personal data?

Momentum EMEA does not retain personal data longer than is strictly necessary for the purposes for which the personal data are collected. The data retention policy contains a list of purposes and periods.

Sharing personal data with third parties

Momentum EMEA may also disclose your personal data when you agree to allow us to do so, when we have a good faith belief that we are required to provide information in response to a subpoena, court order, or other applicable law or legal process (learn more) or in response to an emergency involving danger of death or serious bodily injury.

Momentum EMEA shares your personal data with various third parties (e.g. (government) organisations, service providers and contractors/suppliers) if this is necessary in order to perform the agreement and to comply with any legal obligations.

We will disclose personal information to companies that help us operate our business to detect, prevent, or otherwise address fraud, deception, illegal activities, misuse of Momentum EMEA services, and security or technical issues.

Third-party data controllers may also use Momentum EMEA products and services to collect and process your personal data. If you use an email address associated with a corporate domain (such as yourname@companyname.com) to access the Momentum EMEA services or have been invited by a company to use the services, we may provide your personal information to that company.

We also disclose your personal information to companies we engage to process personal information on Momentum EMEA's behalf for the above purposes. Such companies (including companies that may record or store communications) include providers of customer support services, chatbots, providers of analytics technologies that track your record and analyse interactions with our websites to help us improve your experience, technology providers for artificial intelligence that records and analyses your content or communications, payment processing services, fraud monitoring and prevention, detecting and preventing deceptive or illegal activities or misuse of our services, email, social media and other marketing platforms and service providers, and hosting services.

If we merge with or are acquired by another company, if we sell an Momentum EMEA business unit, or if all or a substantial portion of our assets are acquired by another company, your information is likely to be disclosed to the potential buyer, our advisors and any advisors of a potential buyer and become one of the assets transferred to the new owner. We may disclose or publish aggregated information that does not specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use our services.

We conclude processing agreements with any companies we instruct to process your data. This is to ensure the same level of protection and confidentiality of your data. Momentum EMEA will remain responsible for these processing operations.

Transfer of personal data outside the European Economic Area

If you wish to use our services, you acknowledge that Momentum EMEA may transfer your personal data to other countries where Momentum EMEA and their partners and suppliers operate, including the United States. To safeguard such transfers in accordance with Articles 44-49 GDPR, Momentum EMEA relies on the European Commission's Standard Contractual Clauses (SCCs) as a transfer mechanism. These clauses impose contractual obligations on the recipient of data to ensure an adequate level of protection.

Momentum EMEA is part of an international group headquartered in the United States. Customer data may be shared within group entities when necessary for business operations. All processing is conducted in accordance with applicable data protection laws, including the GDPR. Any transfers outside the European

Economic Area, including to the United States, are safeguarded by SCCs agreed between Momentum EMEA and Momentum Telecom Inc.

If you have any questions about the transfer of your personal data, please contact security@gomomentum.eu.

Cookies or similar technologies we use

Momentum EMEA uses only technical and functional cookies, and analytical cookies that do not infringe your privacy. Cookies are small text files that are stored on your computer, tablet or smartphone the first time you visit this website. The cookies we use are necessary to ensure the technical operation of the website and your ease of use. They ensure the proper functioning of the website and remember your preferred settings, etcetera. We can also use them to optimise our website. You can disable cookies by changing the settings of your internet browser so that it no longer stores cookies. It is also possible to delete all previously stored information via your browser's settings. More information about the use of cookies can be found in the Cookie banner on the website, which is provided by Cookiebot.

Access to and rectification and erasure of data

You have the right to access, rectify or erase your personal data. You also have the right to withdraw any consent you have given for data processing, to object or to restrict Momentum EMEA's processing of your personal data. You also have the right to data portability. This means that you can ask us to transmit, in a computer file, your personal data in our possession to you or another organisation of your choice.

You may exercise these rights by submitting your request in writing to security@gomomentum.eu. In some circumstances, Momentum EMEA may not be able to comply with your request (or part of it). This may be related to statutory retention periods or our legitimate interest(s). If we cannot meet your request, we will explain why this is so.

To verify that it was really you who made the request for access, we will ask you to attach a copy of your ID to your request. Please redact your photo, MRZ (machine-readable zone, the strip containing numbers at the bottom of your passport), passport number and citizen service number (*BSN*) on this copy, in order to protect your privacy. We will respond to your request as soon as possible, but in any event within four (4) weeks.

Momentum EMEA would also like to point out that you can submit a complaint to the national supervisory authority: the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*). You can do this via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

How we protect personal data

Momentum EMEA takes the protection of your personal data seriously and takes appropriate measures to combat misuse, loss, unauthorised access, unwanted disclosure and unauthorised amendments. If you believe that your personal data are not properly protected or if there are signs of misuse, please contact our customer service or send an email to security@gomomentum.eu.

How we handle job applications

To ensure that your job application proceeds as smoothly as possible, we would like to receive the following data from you:

- contact details (name, address, date of birth, telephone number, email address, etc.);

- availability;
- detailed CV (including education and work experience).

By sending us your job application, you also consent to us performing an online screening as part of the application process (LinkedIn, etc.).

We do not transfer your personal data to third parties for commercial purposes. Only third parties that assist us in finding new colleagues may sometimes need to access all or part of your personal data. We make sure that these third parties handle your data with care and abide by the rules.

If you apply for a job, we receive your personal data. We retain these data for no more than four (4) weeks after the end of the application process unless you have given us your express consent to retain the data for a longer period. We will then retain your data for no more than one (1) year after the end of the application process. That will enable us to contact you in the future for any new, suitable job openings.

Amendments to the privacy statement

Sometimes we need to update this Privacy Policy so that Momentum EMEA can adapt it to new technologies, industry practices, legal requirements, or for other purposes. The rules on personal data protection and our business operations are subject to change. Momentum EMEA therefore reserves the right to amend this Privacy Policy. If we do so, we will revise the “last updated” date at the top of this Privacy Policy and post the revised policy on this page so that you are aware of the information we collect, how we use it, and under what circumstances we can make this public. The most recent privacy policy is always available on <https://gomomentum.eu>. We encourage you to periodically visit the website for the latest information about our privacy practices. In certain circumstances (for example, where certain material changes are made or where required by applicable privacy laws) we will notify you of these changes and, where required by applicable law, we will obtain your consent. We may notify you by email to you, by posting a notice of these changes in our services, or by other means consistent with applicable law. This Privacy Policy was last amended on 21 September 2025.

The laws of the Netherlands apply to the provisions of this Privacy Policy.