

### **Privacy Statement**

Horizon Telecom BV, with its registered office at Boylestraat 38A in (6718 XM) Ede, the Netherlands, is a professional IT service provider.

When offering our data and telecommunication services, we process personal data. Processing personal data usually is (technically) necessary for our service provision.

This Privacy Statement sets out how Horizon Telecom 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.

## Who is responsible for the processing of your personal data?

Horizon Telecom provides its services directly to the users of its registered services.

Horizon Telecom is responsible for the data collected when providing its services and it is a controller within the meaning of the General Data Protection Regulation ("GDPR").

#### **Contact information**

Boylestraat 38A 6718 XM Ede The Netherlands

+31(0)20-2261500

https://www.horizontelecom.nl/

Our Data Protection Officer can be contacted at meldpunt@horizontelecom.nl.

### Which personal data do we process?

Horizon Telecom processes personal data when our services are used and/or because data are disclosed to Horizon Telecom.

The overview below shows the personal data that Horizon Telecom 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 for our service provision;
- Data on calls that are charged and/or displayed by our systems for our service provision.

### **Minors**

Our website and/or service does/do not intend to collect 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 meldpunt@horizontelecom.nl, and we will remove those data.

# Our purposes and the basis for processing personal data

Horizon Telecom processes personal data in accordance with Article 6 GDPR and based on the following:

- your consent;
- a legitimate interest;
- in order to perform or prepare an agreement, for example:
  - processing payments;
  - contacting you by telephone or email if this is necessary for us to perform our services;
  - providing information about changes in our services and products;
  - creating an account;
  - delivering goods and services;
  - Horizon Telecom also processes personal data if we are legally obliged, for example data needed for our tax returns because of legal obligations.

### **Automated decision-making**

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

# How long do we retain personal data?

Horizon Telecom does not retain personal data longer than is strictly necessary for the purposes for which the personal data are collected.

### Sharing personal data with third parties

Horizon Telecom shares your/the personal data with various third parties if this is necessary in order to perform the agreement and to comply with any legal obligations. 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. Horizon Telecom will remain responsible for these processing operations.

### Cookies or similar technologies we use

Horizon Telecom 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.



### 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 to Horizon Telecom'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.

Requests for access to or rectification, erasure or transmission of your personal data or requests for withdrawal of your consent or objections to the processing of your personal data may be sent to meldpunt@horizontelecom.nl. In some circumstances, Horizon Telecom may not be able to comply with your request (or part of it) as a data subject. This may be related to statutory retention periods or legitimate interests. 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 weeks.

Horizon Telecom 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

Horizon Telecom takes the protection of your data seriously and takes appropriate measures to combat misuse, loss, unauthorised access, unwanted disclosure and unauthorised amendments. If you believe that your data are not properly protected or if there are signs of misuse, please contact our customer service or send an email to meldpunt@horizontelecom.nl

### 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 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 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**

The rules on personal data protection and our business operations are subject to change. Horizon Telecom therefore reserves the right to amend this privacy statement. The most recent privacy statement is always available on www.horizontelecom.nl. This statement was last amended on 17 December 2023.

