

PRIVACY STATEMENT VIRTUAL BODYGUARD

Last edited on January 1st 2022

INTRODUCTION AND DEFINITIONS

This privacy statement applies to the website and the onboarding process of Virtual Bodyguard on www.bodyguard.io. By subscribing to our service we obtain personal data regarding you. This privacy statement is intended to inform you about this process. Before you read the privacy statement, we would like to clarify four concepts that are important for a full understanding of the privacy statement. These four concepts are: the '**privacy statement**', the '**data subject**', '**personal data**' and '**processing**'.

The '**privacy statement**' is an informative document. It informs – among other things – which personal data is collected, for what purpose, what is done with it, how long this takes place and what rights the data subject has.

The privacy statement is addressed to the person whose personal data will be processed. That person is called the '**data subject**'.

Personal data is a broad concept. It is all information about an identified or identifiable person. This means that the information is directly about a person, or can be traced back to a person. e.g: someone's name, address, telephone number, email address, IP-address, licence plate, passport photograph.

Every action that can be done with personal data is indicated by the word '**process**'. This includes collecting, organizing, storing, updating, modifying, retrieving, using, distributing, combining, blocking, erasing, destroying the data etc.

CONTACT INFORMATION

You can contact Virtual Bodyguard with questions, comments or complaints about the handling of personal data via email. Send your message to the following address: christiaan@bodyguard.io

PERSONAL DATA

Virtual Bodyguard requests a number of personal data as part of the onboarding process with the customer. The customer voluntarily chooses which personal data he discloses to Virtual Bodyguard. The following personal data is requested:

- Full name
- IP address
- Payment details
- Preferred languages
- End points, hardware equipment
- E-mail address
- Company name

The processed personal data will be deleted no later than three months after the agreement with the data subject has been terminated.

PURPOSE

Virtual Bodyguard processes the personal data for the following purposes:

- Necessity for the service
- Maintaining a customer file
- Performing analyses within our system
- Legally required administrative purposes
- Handling complaints

LEGAL BASE

The personal data requested by Virtual Bodyguard as part of the onboarding process is based on:

- Consent of the data subject
The personal data is voluntarily provided by the data subject, this consent can be withdrawn at any time. Use the contact details.
- Necessity for concluding the contract with the data subject
- On the basis of the company's own legitimate interest, specifically for facilitating the service

PROFILING

Profiling and automated decision-making are not used.

THIRD PARTIES

Your personal data can be shared with the following categories of parties:

- Administrative service parties
- Data providers

MINORS

Our services are not aimed at children. If visitors under the age of 21 want to use our services, he / she needs the consent of his / her parents.

DATA SECURITY

Virtual Bodyguard considers the protection of its data, including your personal data, to be of great importance. For this reason we have taken several measures, both organizational and technical.

The following organizational measures are and will be taken:

- Secure access to office building
- Signed confidentiality agreements by all employees
- Evaluation and validation of safety procedures
- An internally responsible employee for information security has been appointed

The following technical measures have been and are being taken:

- Closed network systems through multi-factor authentication
- Security of the network by means of digital security software, such as firewalls and virus scanners

- Periodic backups of files with personal data
- Encryption of digital files
- Pseudonymisation of personal data
- The content of communication data is not saved

Virtual Bodyguard makes every effort to secure its systems and website against unauthorized use and loss or theft of personal data. It is impossible to completely rule out any unauthorized use and any accidental loss of personal data. The data protection supervisory authority will be notified of a data breach, if it is serious. If a data breach does occur, this will be reported to the data subjects immediately if there is a high risk to the privacy of the data subjects. Every data breach is documented by Virtual Bodyguard.

DATA SUBJECT RIGHTS

Every data subject has rights to guarantee a correct privacy policy. If you want to use one or more of these rights, you should contact the controller (see “contact information”).

Right of access by the data subject

You have the right to obtain the personal data that we have processed from you. You have the right to have an explanation, and can, if desired, request a copy of the personal data. Costs may be associated with this request.

Right of rectification

You have the right to rectify personal data that we process about you, if they are incorrect or incomplete. Rectifying means recovering one or more errors.

Right of erasure

You have the right to request that (a part of) your personal data is deleted from our system. Virtual Bodyguard is obliged to delete the data. However, the following grounds for exception apply, when processing is required:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- for the establishment, exercise or defence of legal claims.

Right to object

You have the right to object to the processing of your personal data. State the specific reasons for making this objection.

Restrictions

You have the right to temporarily stop the processing of personal data. This means that the processing will temporarily stop, it does not mean that your personal data will be deleted. This possibility exists so that a problem, complaint or objection can be resolved.

Right of portability

You have the right to receive personal data that we have processed from you in a readable format.

Right to lodge a complaint

If you believe that your rights are being violated, you have the right to file a complaint with the supervisory authority. This is the Dutch Data Protection Authority. The complaint can be submitted via mail or via the website of the Dutch Data Protection Authority for personal data. The following information applies:

Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ Den Haag

Virtual Bodyguard would like you to file a complaint first (see “contact information” listed). We prefer to solve the complaint with you.

STAY WELL INFORMED

This privacy statement has been compiled with (legal and technical) care. We keep a close eye on developments in the field of privacy law and will act on this. The privacy statement can sometimes be changed. We therefore recommend that you regularly check the privacy statement. At the top of the document we always place the date on which the document was last modified.