



STPTAX

PRIVACY STATEMENT

2023

Version 1.0

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STP Tax Privacy Statement

The protection of personal data is very important to STP Tax. We therefore consider it important to handle your personal data responsibly. In some cases, we process your personal data. What this processing entails, what personal data STP Tax processes and for which purposes can be found in this privacy statement. This privacy statement also describes your rights in relation to the processing of your personal data. Here you will also find information about where and whom to turn to when you have questions about the processing and protection of your personal data.

STP Tax is responsible for properly processing your personal data and will therefore handle your personal data with due care. Processing means that STP Tax will, for example, store or supplement your personal data, or provide it to third parties, and will also delete your personal data after some time. We will only use your personal data for the purposes described in this privacy statement.

Whose personal data is processed by STP Tax?

STP Tax processes personal data of:

- visitors to our office;
- customers;
- clients;
- website visitors:
- applicants;
- suppliers.

On what legal bases does STP Tax process your personal data?

STP Tax may only process your personal data if it has a legal basis for doing so. STP Tax only processes personal data because:

- this is necessary for the performance of a contract between you and us, for example a service agreement, a contract for services, etc.;
- there is a legal obligation with which STP Tax must comply, for example obligations under tax laws or a police order;
- STP Tax has a legitimate interest in, for example, informing you of updates or changes to our services. For example, in some cases we have a legitimate interest if we process personal data for direct marketing purposes;
- you have given your consent.

For what purposes does STP Tax process your personal data?

STP Tax processes your data for various purposes. To optimise our services to you, we process your personal data for the following purposes, among others:

- to provide our services to clients;
- to identify you and to not confuse you with someone else;
- to send digital invitations and appointment reminders;
- to get into contact with suppliers, contact persons and other data subjects;
- to respond to questions from clients and other data subjects;
- to comply with legal obligations (record-keeping and retention obligations);
- to handle the financial aspects of the services provided;
- to ensure your and our safety (by means of camera surveillance);
- to handle complaints and disputes;
- to conduct a quality and client satisfaction survey.

What personal data does STP Tax process?

To perform our activities, it is necessary to collect data from you. STP Tax processes the following personal data for the above-mentioned purposes:

- name and address details;
- telephone number;
- e-mail address;
- date of birth;
- marital status;
- job application details;
- gender;
- contact details, such as your e-mail address and telephone number;
- identification data;
- pictures of data subjects;
- financial data;
- payment details.

What principles does STP Tax follow when processing your personal data?

STP Tax ensures that your personal data is handled securely. The General Data Protection Regulation (GDPR) and the ensuing rules are decisive in this regard. We strive to inform you about our handling of your personal data in a transparent, clear and understandable manner.

The following principles apply here:

- your personal data will only be processed in accordance with the applicable laws and regulations and in a proper and careful manner;
- we will not process more personal data than necessary to achieve the above-mentioned purposes and will only use your personal data for the purpose for which it was collected;
- we will only process personal data if we have a legitimate purpose for doing so;

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- we will ask for your explicit consent if this is necessary for the processing of your personal data. We will record this consent. If you consent to us processing your personal data, you may withdraw your consent at any time;
 - we will not keep your personal data any longer than is strictly necessary;
 - we will not transfer your personal data to third parties, unless we have a legal obligation to do so or you have given your explicit consent;
 - we take appropriate technical and organisational measures to protect your personal data. If we transfer your personal data to a third party outside the European Economic Area (EEA), we will make contractual arrangements with the party concerned to ensure that your personal data is adequately protected.

With whom will your personal data be shared?

In some cases, it is necessary for STP Tax to share your personal data with third parties. In the context of our services, we may use the services of third parties, for example if these third parties have specialised knowledge or resources that we do not have in-house. These may be processors or subprocessors. If engaging third parties results in them having access to the personal data or recording and/or otherwise processing personal data themselves, we will agree in writing with those third parties that they will comply with all obligations of the GDPR. Naturally, STP Tax will only engage third parties whom we can and may assume are reliable parties who will handle personal data properly and can and will comply with the GDPR. This entails, among other things, that these third parties may process your personal data only for the purposes stated above.

How do we take care of your personal data?

- a) STP Tax keeps a processing register containing information about what personal data we process, and for what purposes and on what legal bases we process personal data. This register also includes the retention periods.
- b) STP Tax has taken appropriate technical and organisational measures to protect your personal data against loss or any form of unlawful processing.
- c) All employees of STP Tax have signed a nondisclosure agreement.
- d) STP Tax concludes processing agreements with parties involved in the performance of our services. The processing agreement contains, among other things, agreements on security measures and reporting of data breaches.
- e) STP Tax, as data controller, will record security incidents and data breaches. A protocol was drawn up for this purpose.
- f) STP Tax is able to adequately respond to the rights of data subjects.

For how long will your personal data be kept?

STP Tax will not keep your personal data any longer than necessary for the purpose for which it was initially collected. An overview of the main retention periods applied by us is provided below:

- Administrative data: seven years;
- Client data: one year after the date on which the final work was performed in the context of the performance of the contract for services;
- Personal data, if you do not use our services: three months.

What are your rights regarding the processing of your personal data?

You have a number of rights regarding the personal data we process about you. There may be circumstances in which a specific request cannot be complied with. If this is the case, STP Tax will always inform you of this with reasons.

1. Right of access

You have the right to access all personal data we collect from you. If you wish to access your personal data, you can make an access request. We may not refuse this request.

The right of access only applies to your own personal data. Therefore, access to some parts of your file may be restricted because they contain information about someone other than yourself. Personal work notes are also not covered by the right of access.

2. Right to data portability

You have the right to receive the digital data provided to STP Tax. You may then transfer this data to another organisation if so desired. This right only applies to data that STP Tax processes based on your consent or based on a contract concluded with you.

3. Right to rectification

You may ask STP Tax to correct your personal data if you believe that it is factually incorrect, incomplete or irrelevant to the purpose for which it was collected. This could be the case, for example, if STP Tax made a registration error.

4. Right to object

If you prefer not to have your personal data processed by STP Tax, you may, in some cases, object to the processing of your personal data. For example, if STP Tax uses your personal data for marketing or advertising purposes.

If STP Tax processes your personal data based on your consent, you can terminate the processing of your personal data by withdrawing your consent. In that case, you do not need to make an objection to terminate the processing of your personal data.

5. Right to erasure

You have the right to ask STP Tax to destroy your file in full or in part. STP Tax need not always comply with such request. If it is in your or another person's interest to keep the file, STP Tax may decide not to comply with this request. The same holds true if there is a legal obligation to keep the file.

Applicants

You can apply to a job vacancy through our website. We will record your cover letter and cv in our employee database system. The data will be kept in this system for four weeks, unless you indicate that we may keep your data for a longer period of time. In that case, your data will be kept until one year after the end of the selection process. Your data will never be transferred to third parties without your consent. If you have any questions about this, please contact our HR department at pieter.drubbel@stp.nl.

Giving and withdrawing consent

As stated earlier, in some cases STP Tax will ask for your consent to processing your personal data. If you wish to withdraw prior consent, please send an e-mail to jan.gerrand@stp.nl.

Websites of third parties

This privacy statement does not apply to websites of third parties that are connected to STP Tax's website through links or buttons, such as social media buttons. STP Tax cannot guarantee that these third parties will handle your personal data in a responsible and secure manner.

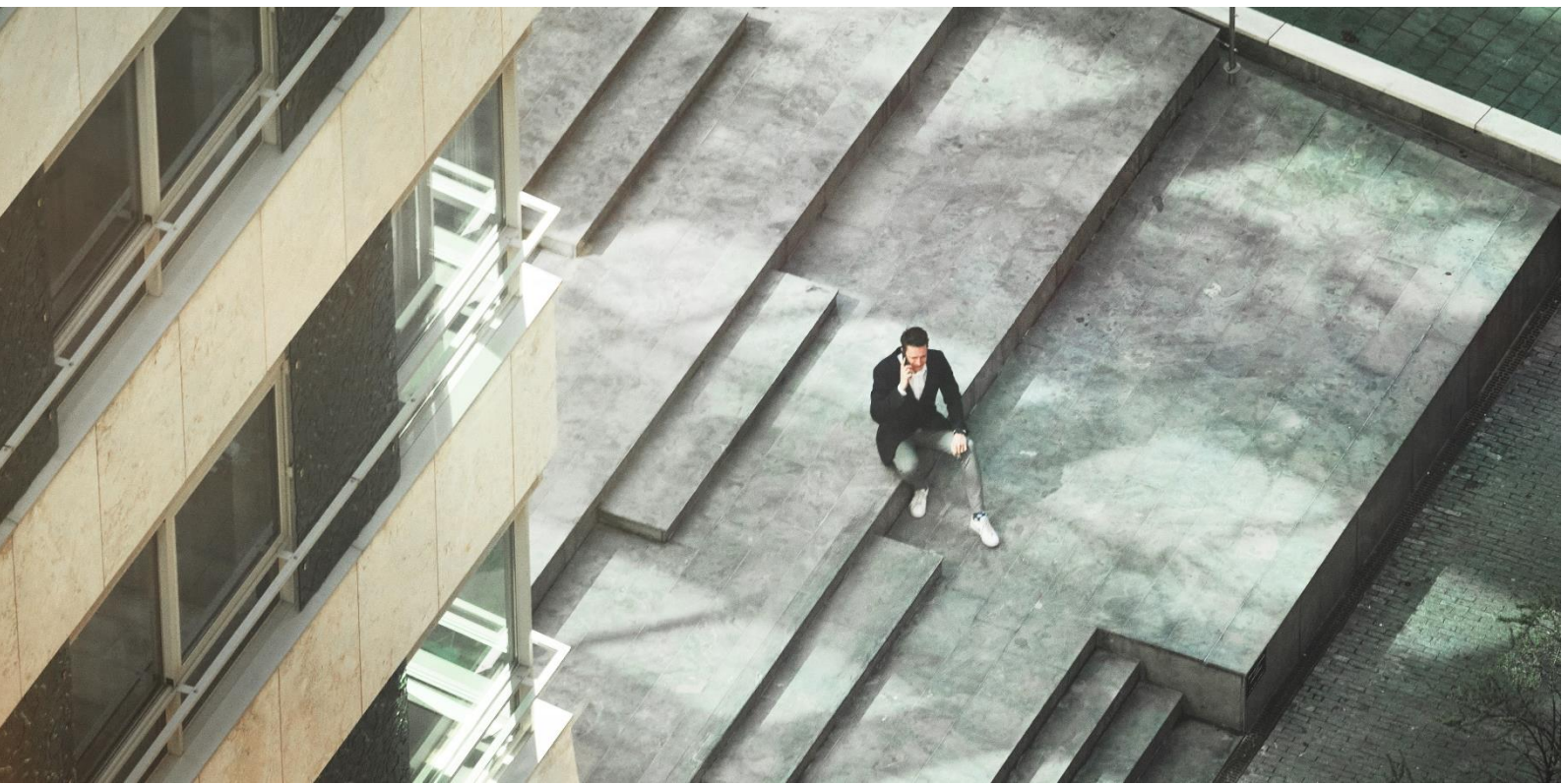
Changes

STP Tax may change this privacy statement. Any changes to this privacy statement will be announced on our website. STP Tax may process your personal data for new purposes that have not yet been included in this privacy statement. In that case, we will inform you of the changes before we will use your personal data for these new purposes.

Questions or comments?

If, after reading this privacy statement, you still have questions, please contact our Privacy Coordinator by sending an e-mail to jan.gerrand@stp.nl. You will receive a reply within five business days.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).



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