



# Peaks Privacy Statement

## International

26-10-2018

### Introduction

Peaks processes your personal data. We want you to be informed about how we gather, use and disclose this data . This privacy statement answers the most important questions about how Peaks uses your personal data. If you have any questions regarding this privacy statement, please [contact us](#).

This privacy statement applies solely to our International websites - it is an abridged version of our complete privacy statement, which you can find here [\(Dutch\)](#).

Because this privacy statement references how we process your personal data, we want to start by explaining the terms “processing” and “personal data”.

**Personal data:** every piece of data that, directly or indirectly, identifies you as an individual. This can include your name and email address, but also your date of birth and payment information.

**Processing:** this refers to everything that can be done with personal data. This includes collecting, but also retaining, using and deleting your information.

## 1. Whose data do we process?

We process the personal data of everyone with whom we have, had, or want a direct or indirect relationship.

For the use of this website this includes the information of:

- people who show an interest in our products or services, or
- people who are associated with a business or organisation with which we have, had or want a relationship.

In order to protect your and our interests we may process your data through third parties. An up-to-date list of third parties is available on request.

## 2. Who is responsible for processing my personal data?

Peaks is responsible for processing your data.

## 3. Which information is processed by Peaks?

Type of information	Description of information	Examples of how Peaks uses this information
Directly or indirectly identifiable information.	Name and email address.	To identify and contact you.
Saved emails.	Emails that you have sent to us and emails that we have to you.	We can use emails to improve our service and train, coach and evaluate our employees.
Information that tells us something about how our website is used and data of emails we sent to you	Please see our Cookie Statement for more information. We collect your IP address and data about the device with which you visited our website.	To create a functioning website and to improve it when necessary. To offer personalised advertisements or banners.
Information we receive from third parties.	Information we have received from companies you have given permission to share your information, for example Google and Facebook.	To contact you or create personalised offers.
Information we share with third parties.	Information we share with third parties that aid us in providing our services. Information you have given permission to share with a third party.	Marketing-related partners who process information for us because they are involved in providing our services.

#### **4. How does Peaks gather my personal data?**

We collect your personal data when you interact with us. For example when you contact us via our website, email or telephone.

We can also receive information because you have given a third party permission to share information with us.

#### **5. Why does Peaks process my personal data and to what end?**

In order to be as clear and transparent as possible, we want to clarify what we mean by the terms “purposes” and “lawfulness of processing”.

**Purposes:** What we want to achieve by processing your data.

**Lawfulness of processing:** Why we process your data for this website is usually because we are permitted to process your data because we ask for, and receive, your permission.

##### **a. To develop and improve our products and services**

###### *Purposes*

In order to provide you with the best experience, we’re continuously updating and improving our products and services. In some instances this requires processing your personal data. For example when you ask us a question about a product. Or when we analyse visits to the Peaks website through website analytics. We have integrations with third parties such as Google Analytics to facilitate the processing and analysis of information. This makes it possible to create profiles of potential customers.

To analyse your visit to our website we process your personal data. We do this by using cookies and similar techniques in order to improve our website.

###### *Lawfulness of processing*

We process your data because we have a legitimate interest to do so. We can also ask for your permission to process your data in order to develop and improve our products and services. You can always retract your permission.

##### **b. For promotional and marketing goals and to maintain our relationship with you**

###### *Purposes*

We process your personal data for relationship management and promotional and marketing purposes. For example when we want to inform you that the app is going live. Or to improve your experience. We use integrations with various social media and advertising companies to promote and market our app.

We use your personal data to send information about the app. You can unsubscribe from these marketing messages quickly and easily by clicking the “unsubscribe” link at the bottom of every newsletter or email.

We can use your personal data for analytics purposes. By analysing this information we can improve your experience. For example, we can connect your use of our website to your personal data and improve your experience or offer relevant advertising.

*Do you want to restrict access for marketing purposes?*

If you want to object to the processing of your personal data you can contact Peaks. Or unsubscribe from personalised online advertisements at [www.youronlinechoices.com](http://www.youronlinechoices.com). You can also prevent websites from placing cookies on your computer, tablet or smartphone. You can do this by adjusting your browser preferences. You can also change other cookies settings, such as setting up a warning if cookies are served. If you do not accept cookies from [www.peaks.nl](http://www.peaks.nl), you may receive a cookie notice every time you visit the website.

*Lawfulness of processing*

We process your data because we have a legitimate interest to do so. We can also ask for your permission to process your information in order to develop and improve our app. You can always retract your permission.

### **c. For archiving purposes**

*Goals*

We don't gather more personal data than necessary to achieve the aforementioned purposes. If we do not save information for those purposes, we can still save personal data for archiving purposes. This information is only used for legal procedures or historical, statistical or scientific purposes.

*Lawfulness of processing*

When processing data for archiving, scientific or historical research or for statistical purposes, we do so to protect the legitimate interests of Peaks, the financial sector or our customers and employees.

## **6. How long does Peaks save my personal data?**

Your information is saved securely and isn't stored longer than necessary for the purpose for which it was processed. Your email address will be stored for a maximum duration of 13 months. The retention period for the cookies can be found in our cookie statement.

## **7. Does Peaks make automated decisions about me?**

Automated decision-making refers to decisions made about you by a computer, rather than by people. Peaks does not utilize automated decision-making.

## **8. Who within Peaks has access to my personal data?**

Employees of Peaks can only access your personal data if required to fulfil their job. All of our employees have a duty of confidentiality.

## **9. Does Peaks use my personal data for other purposes?**

We can only use data processed for one purpose for another purpose when the purposes are closely related.

## **10. Does Peaks give my personal data to others and to countries outside of the EU?**

We may give your data to third parties outside of Peaks if we are legally required to do so, because it is necessary to execute an agreement with you or because we utilize another service provider.

Sometimes we utilize other parties or business partners to process personal data for us. Such as parties who store personal data. All parties with which we collaborate must be deemed trustworthy by us. We can only utilize third parties if this suits the goal for which we processed your personal data. For example for promotional and marketing goals.

We only collaborate with a third party if it meets certain agreements, has taken the necessary security measures and guarantees confidentiality. Your personal data can also be shared with third parties we employ to execute our services.

If we share your data with parties outside of the European Union, we take extra steps to ensure the protection of your information. Not all countries outside of the EU have the same data-protection rules as required within the EU. If we use a third party outside of the EU, and it is located in a country that - according to the EU - doesn't have strict data-protection rules, we only share personal data if other security conditions are met. This includes contractual agreements approved by the European Commission or conditions based on the 'Privacy Shield' (United States).

In accordance with your right to receive information, you may request an overview of third parties we have shared information with.

**12. What are my rights at Peaks?**

- a. the right to information
- b. the right to review and correct information
- c. the right to delete your information
- d. the right to restrict information
- e. the right to receive an electronic copy of your information
- f. the right to object to the processing of information on the basis of legitimate interest
- g. the right to object to direct marketing

If you have requested information on the basis of your aforementioned rights, we will respond to your request within one month of receiving it.

We may ask you to specify your request to view information. For example if you want to view conversations, we can ask for details such as call time or the number from which you called. In rare situations we can extend the period within which we have to reply to a maximum of three months. We will keep you updated on the progress of your request.

We may ask for identification if you request information. If you want to view information we want to make sure we send the information to the correct person. If we are uncertain about your identity or hesitant about whether we can send your information securely, we may ask you to come to our offices so we can verify your identity or so you can safely retrieve your information.

We may deny your request for information. For example if the rights of others are affected, or because we are not legally able to share the information. It can also be because we have weighed our interests and decided that the interests of Peaks or others have priority. We will let you know if this happens.

If we change your information, or delete information at your request, we will let you know. If necessary we will also inform third parties with your information.

**12. Who can I contact with a question or complaint?**

For questions or complaints about the processing of personal data by Peaks you can submit a complaint at the following address:

*Customer service:*

- [klantenservice@peaks.nl](mailto:klantenservice@peaks.nl)

*Data Protection Officer:*

- [privacy@peaks.com](mailto:privacy@peaks.com)
- Telephone number: +31 20 2188 000

#### **14. Can Peaks adjust this document?**

Yes, our privacy policy can change from time to time. In response to changing processes, we may adapt the privacy policy to reflect those changes. If changes to the privacy policy have an impact on you, you will be notified via email and/or a prominent notice on our website. You can find the most recent Dutch version of our privacy policy at [www.peaks.nl/privacy](http://www.peaks.nl/privacy). This version applies to our non-Dutch websites. You can also find earlier versions of our privacy statement on our website.