

# Privacy Notice

Healthy Workers B.V.

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# Privacy Notice

## Who are we and what do we offer?

We are Healthy Workers B.V. (**Healthy Workers**). The Healthy Workers Platform is an ESG and building performance platform which enables users to track and improve the performance of their buildings for health, comfort, sustainability and cost-saving purposes (our **Platform** and the **Services**). You can access our Platform through our Website: [healthyworkers.com](https://healthyworkers.com).

## Personal Data and Controller

We process **Personal Data**. Personal Data means all information by which a person can be directly or indirectly identified. Under the General Data Protection Regulation (**GDPR**) we are the so-called Controller of your Personal Data. If you have questions about the processing of your Personal Data, you can always contact us through the contact details listed at the bottom of this Privacy Notice.

## Our Services do not process Personal Data of building occupants

Our Services do not process Personal Data as we only collect non-personal data about the working conditions at buildings that are connected to our Platform. For example, we process the following non-personal data in our Platform:

- **Sensor data** | This includes indoor climate, air quality, light, noise and movement. The noise sensors only register sound intensity (decibel) and do not register or capture voices. The movement sensors only registers movement and do not capture images.
- **Expert data on office (e.g. WELL AP)** | Experts collect observations about the type and quality of the facilities in the building, the indoor and the outdoor office design and the quality of personal working stations.

Our use of non-personal data falls outside the scope of the GDPR and this Privacy Statement. We have also contractually obligated our customers that they and their users may not enter information into our Platform that could constitute Personal Data, such as room designations relating to individuals.

## What Personal Data do we collect as Controller?

As the Controller, we may process your Personal Data in different contexts. We will process your Personal Data if you represent an organisation as our **Customer**, create an Account on our Platform (**Users**) and if you apply for a job at Healthy Workers (**Applicants**). Finally,

we may process Personal Data in a general context, e.g. via our Website and social media accounts (**General**).

If you represent a company as our Customer:

<b>Personal data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>
Contact information: - (Company) name, surname; and - Email address, phone number and contact history.	We use this Personal Data to: - Perform the agreement we have with the organisation you represent; and - Be able to contact you about the Services being purchased.	We may process this Personal Data because we have a <b>legitimate interest</b> in performing the <b>contract</b> with the organisation you represent and to contact you and manage our customer relations in our administration.
Financial information: - (Company) name, email address, bank account number, other information on the invoice.  <i>Please note that this is only personal data if this information is traceable to you as a natural person.</i>	We use this Personal Data to: - Process and manage payments; and - To be included in our records for tax purposes.	We may process this Personal Data because we have a <b>legitimate interest</b> in performing the <b>contract</b> with the organisation you represent.  We also have a <b>legal obligation</b> to process (part of) the Personal Data for the purposes of the Tax Authorities.

If you are a User of our Platform:

<b>Personal data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>
Contact information: - (Company) name, surname, email address, phone number and contact history.	We use this Personal Data to: - Administer your contact information; and - Be able to contact you about the Services.	We may process this Personal Data because we have a <b>legitimate interest</b> to contact you and manage our relations in our administration.

<b>Personal data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>
<p>When you create an account:</p> <ul style="list-style-type: none"> <li>- First- and last name; and</li> <li>- Work email address.</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Verify your account;</li> <li>- Create your account;</li> <li>- Identify you as a User;</li> <li>- Contact you regarding the onboarding process;</li> <li>- Show your account on the Platform dashboard for other Users with permissions granted by us, or the Customer; and</li> <li>- Provide the Personal Data to third parties with permissions granted by the Customer (such as an energy supplier).</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> to:</p> <ul style="list-style-type: none"> <li>- Approach you appropriately in our communications;</li> <li>- Ensure that only verified Users can access our Platform; and</li> <li>- Enable our Customers to manage the building performance and access rights as part of our Services.</li> </ul>
<p>When you use our Platform:</p> <ul style="list-style-type: none"> <li>- Information on your device type, session date and time, IP address [and User behaviour on our Platform].</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Communicate with your device type;</li> <li>- Adapt our Platform to the used device;</li> <li>- Enable you to use our Platform; and</li> <li>- Improve the usability of our Platform.</li> </ul>	<p>We may process this Personal Data, because we have a legitimate interest to do so, i.e. to provide you with a good functioning Platform and improve our Platform for our Users. We may use your [IP address and User behaviour] to improve our Platform because we have your consent.</p>

If you are an Applicant:

<b>Personal data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>
<p>When you show interest in a position:</p> <ul style="list-style-type: none"> <li>- Name;</li> <li>- E-mail address;</li> <li>- Address; and</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Contact you about the application.</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> in processing this Personal Data. We need the data to get (and keep) in touch</p>

Personal data	Purpose(s)	Legal basis
<ul style="list-style-type: none"> <li>- Telephone number.</li> </ul>		with you and to process and review the application.
<p>When you apply for a position:</p> <ul style="list-style-type: none"> <li>- Information provided regarding your application, among others: Personal Data included in the Curriculum Vitae and motivation letter, qualifications, photo, gender and day of birth.</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Assess whether you suit the job and Healthy Workers; and</li> <li>- Determine which Applicant is the most suitable candidate.</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> in processing this Personal Data and because you provide this data yourself voluntarily. We need the Personal data to get (and keep) in touch with you and to process and review the application.</p>
<p>When we have an interview with you:</p> <ul style="list-style-type: none"> <li>- Notes from interviews.</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Assess whether you suit the job and Healthy Workers; and</li> <li>- Determine which Applicant is the most suitable candidate.</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> in processing this Personal Data. We need the data to get (and keep) in touch with you and to process and review the application.</p>
<p>When we check your application:</p> <ul style="list-style-type: none"> <li>- Information in public profiles, such as LinkedIn and other social networks (where applicable).</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Assess whether you suit the job and Healthy Workers; and</li> <li>- Determine which Applicant is the most suitable candidate.</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> to do so as it is necessary to handle and assess the application.</p> <p>We only process information that is relevant for the application. You will always get the opportunity to react to our findings.</p>

In General, we process the following Personal Data:

Personal data	Purpose(s)	Legal basis
<p>If you visit our Website:</p> <p>Functional information:</p> <ul style="list-style-type: none"> <li>- Information on your device type, browser type, session date and time, IP address and browser type.</li> </ul> <p>Tracking information:</p> <ul style="list-style-type: none"> <li>- Your behaviour on our Website, such as: clicks, device ID, IP address.</li> </ul> <p>We collect these Personal Data using cookies and similar techniques. Please see our Cookie Statement for which cookies and/or similar techniques we use.</p>	<p>We use the Personal Data to:</p> <ul style="list-style-type: none"> <li>- Communicate in the same language of the browser;</li> <li>- Adapt our Website to the used device;</li> <li>- Enable you to use our Website; and</li> <li>- Improve the usability of our Website.</li> </ul>	<p>We may process functional information because we have a <b>legitimate interest</b> to gain insight in the use of our Services in order to provide our Services.</p> <p>In addition, we may use tracking information to gain insight in the use of our Platform in order to improve and secure our Services because we have obtained your consent.</p>
<p>If you visit our social media pages:</p> <ul style="list-style-type: none"> <li>- Information of visitors who leave a comment or otherwise post something on our social media pages, including Personal Data within these comments and/or posts.</li> </ul>	<p>We use this Personal Data to:</p> <ul style="list-style-type: none"> <li>- Contact the visitors in reply of their post and/or comment via our social media pages; and</li> <li>- Process the feedback left on our social media pages.</li> </ul>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> to process this data and because you voluntarily made public such information.</p> <p>Our social media pages are also controlled by the social medium itself. Please check their own privacy notices, to see how each social medium handles Personal Data:</p> <ul style="list-style-type: none"> <li>- LinkedIn: <a href="#">Privacy Notice</a></li> <li>- Facebook: <a href="#">Privacy Notice</a></li> <li>- Instagram: <a href="#">Privacy Notice</a></li> </ul>
<p>If you contact us:</p> <ul style="list-style-type: none"> <li>- Your name;</li> <li>- Phone number;</li> <li>- E-mail address; and</li> </ul>	<p>We use this Personal Data to:</p>	<p>We may process this Personal Data, because we have a <b>legitimate interest</b> to contact and assist you based on your comment or</p>

Personal data	Purpose(s)	Legal basis
- The content of the correspondence.	- Answer your questions and/or handle any complaints; - Support you in using our Services; and - Improve our Services as a result of questions and feedback from you.	question and to improve our Services as a result of the questions and feedback we receive.
If you subscribe to our newsletter:  - Name; and - E-mail address.	We use this Personal Data to:  - Send you our newsletter and keep you informed on all our (future) Services.	We may process this Personal Data, because you gave us your <b>consent</b> to do so (by subscribing via our Website). We may send you newsletters if you are a User – who paid for our Services –, because we have a <b>legitimate interest</b> to do so.  In every newsletter there is a link via which you can unsubscribe.

## Mandatory information

When you engage our Services, it may be legally or contractually required that you provide us with certain Personal Data, as indicated with a (\*). For example, we may need information regarding your contact details so that we can contact you. Where you do not provide us with such information, this will usually imply that we will not be able to provide you with specific Services or perform part of our agreement with you.

## How long do we keep the Personal Data?

We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obliged to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Personal data of Users** | This Personal Data will be retained for as long as the account is active and for a maximum of 2 years after the account was last used. When you (or our Customer on whose behalf you use the Platform) request to delete your account, we will retain your Personal Data until such request is fulfilled.

- **Newsletters** | We retain the Personal Data used for sending newsletters until you unsubscribe from our newsletter.
- **Personal Data in our correspondence** | This data is stored as long as necessary to handle your message/question/complaint and for a period of 5 years thereafter.
- **Personal Data in our records for the (tax) authorities** | This data is stored for seven (7) years, unless we are legally obliged to retain the data for a longer period.
- **Personal data of Applicants** | We store this Personal Data for a maximum of 1 year after the application process to ensure that we do not approach you again. This is a commitment we have to our recruitment firms.

After expiry of the aforementioned retention period(s), we may process and retain certain Personal Data to comply with legal retention obligations and/or for fraud/misuse investigations or to substantiate a (judicial) claim. In such events, we will retain the Personal Data separately and only use such Personal Data for the aforementioned purposes.

## **Do we share your Personal Data with others?**

### **Processors**

We work with third parties who process personal data on our behalf (**Processors**). By doing so, we continue to uphold responsibility for ensuring protection of your Personal Data during such processing. These Processors may only use or disclose the data collected and processed by us within the scope of our instructions to them and under no circumstances for other purposes. We enter into a data processing agreement with all of our Processors. We use Processors for:

- data storage;
- email management and communication;
- analysis of the use of our Platform; and
- sending newsletters.

### **Controllers**

We might also share your Personal Data with third parties who use it for their own purposes (**Controllers**). Once they have your Personal Data, it is their responsibility to protect it. To know how these parties handle personal data, you can check their privacy notices. We share Personal Data with:

- Tax authorities: We are legally obliged to include (some of) the Personal Data in our financial administration, which has to be shared with the national tax authority.
- Our customers on whose behalf you use the Services.
- Third parties to whom customers grant access, such as energy suppliers.

Apart from the above, we will only share Personal Data with third parties if the law obliges us to, if you give your permission or if this is necessary for our legitimate interest in special situations such as:

- The protection of our own interests or those of third parties;
- Dealing with a legal case; or
- Selling or merging our company.

## **Export of Personal Data outside the European Union**

We may transmit Personal Data to parties outside the European Union, if one of our Processors or Controllers is established outside the European Union. Personal Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards, or if we have contractual safeguards in place. You may contact us if you wish to receive more information or a copy of the safeguards we take in this scope.

## **Third party websites**

You may find advertising or other (hyper)links on our Website that link to the websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the links that appear on these websites and we are not responsible for the practices employed by websites linked to or from our Website. In addition, these websites, products and services, including their content and links, may be constantly changing. These websites, products and services may have their own privacy notices, user terms and customer service policies. Browsing and interaction on any other website, including websites that are linked to or from our Website, are subject to the terms and policies of that website.

## **Changes of the Privacy Notice**

The Privacy Notice may be changed from time to time. Please check our Privacy Notice frequently. The new Privacy Notice will be effective immediately upon posting on our Website. If we change our Privacy Notice significantly, then we will state so on our Website together with the revised Privacy Notice.

Your rights as a data subject and our contact data

## You have the right to...



### Access

You can ask us to provide access to, and a copy of, your personal data along with additional relevant details.



### Data portability

You can ask us to give you your personal data in a format that you can easily use elsewhere.



### Rectification

You can ask us to rectify any inaccuracies or complete any incompleteness in your personal data.



### Restrict processing

You can ask us to stop using your personal data, but still keep it stored.



### Erasure

You can ask us to erase your personal data, a right often referred to as "the right to be forgotten".



### Withdraw consent

You can ask us to stop using your personal data for the purpose we requested your consent for. This does not impact the legality of any prior or other uses of your data.



### Object

You can ask us to stop using your personal data for things like direct marketing or for our own business needs.

You are always entitled to file a complaint with a data protection supervisory authority if you believe that we are not processing your personal data in accordance with the GDPR. In the Netherlands, the supervisory authority for data protection is:

Autoriteit Persoonsgegevens

Website: <https://www.autoriteitpersoonsgegevens.nl>

If you have questions or concerns about this Privacy Notice or your privacy, you can contact us at [info@healthyworkers.com](mailto:info@healthyworkers.com).

### Healthy Workers B.V.

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Email: [info@healthyworkers.com](mailto:info@healthyworkers.com)

Website: [healthyworkers.com](http://healthyworkers.com)

Chamber of Commerce: 67322174