

PRIVACY STATEMENT

CONCEPTIONAL B.V. · EFFECTIVE 4 SEPTEMBER 2026 · GOVERNING LAW: THE NETHERLANDS

DOCUMENT CONTROL

Document	Privacy Statement
Owner	Conceptional B.V.
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Governing law	The Netherlands

WHO WE ARE

Conceptional B.V. is the controller of the personal data described in this statement. This means we decide why and how your personal data is processed.

- **Address:** Saturnusstraat 60, Unit 60, 2516 AH The Hague, The Netherlands
- **E-mail:** info@conceptional.nl
- **Telephone:** +31 70 205 5688

We have not appointed a Data Protection Officer, as we are not required to do so. Privacy questions and requests are handled directly by our team via the contact details above.

OVERVIEW

We process personal data in the course of providing our services, managing our projects, and operating our website. In most cases this is limited to business contact details — usually a name and an e-mail address.

We collect personal data when you contact us, when you download a report or article from our website, when you apply for a role with us, and when you visit our website. We use it only for the purposes set out in this statement. We do not sell personal data, and we do not use it for purposes unrelated to those described here.

WHAT WE PROCESS, WHY, AND FOR HOW LONG

The table below sets out each category of personal data we process, the purpose, the legal basis under Article 6 GDPR, and how long we keep it.

DATA	PURPOSE	LEGAL BASIS	RETENTION
Enquiries: name, e-mail address, and the content of your message	Responding to your enquiry, whether sent via our contact form or by e-mail directly.	Our legitimate interest in responding to people who approach us (Art. 6(1)(f)).	12 months after our last contact with you, unless the enquiry leads to a project.

Report and article downloads: name and e-mail address	Providing you with the report or article you requested from our website, and following up if we believe our services may be relevant to you.	Our legitimate interest in delivering the content you asked for and in following up on relevant business opportunities (Art. 6(1)(f)). You may object to this follow-up at any time.	12 months after the download or after our last contact with you, unless you tell us not to contact you further.
Clients and prospects: name, business e-mail, telephone number, business address	Corresponding about upcoming, ongoing, or completed projects; managing the client relationship; occasionally sending seasonal greetings or courtesy items.	Performance of a contract (Art. 6(1)(b)), or our legitimate interest in business communication and relationship management (Art. 6(1)(f)). You may object to courtesy mailings at any time.	For the duration of the relationship and 7 years thereafter, in line with Dutch statutory retention obligations for business records.
Job applications: name, contact details, CV, motivation letter, and our interview notes	Assessing your suitability for a role and communicating with you during the application procedure.	Taking steps prior to entering into an employment contract at your request (Art. 6(1)(b)); consent (Art. 6(1)(a)) if you agree to us keeping your details longer.	Deleted no later than 4 weeks after the procedure ends, in line with Autoriteit Persoonsgegevens guidance. With your explicit consent we keep them for up to 1 year for future openings; you may withdraw that consent at any time.
Website usage data: pages visited, approximate location, device and browser type, cookie identifiers	Understanding how visitors use our website so we can improve it; measuring the effectiveness of our marketing.	Consent given via our cookie banner (Art. 6(1)(a)).	Up to 14 months in Google Analytics, in line with our configured retention setting.

We do not ask for more information than we need. Please do not send us special categories of personal data — such as health information — unless we specifically ask for it.

DATAWEBSITE, COOKIES & ANALYTICS

Our website uses cookies and similar technologies. Cookies are small files stored on your device that allow a website to recognise your browser.

- **Necessary cookies.** Required for the website to function and to remember your cookie choices. These are always placed.
- **Analytics cookies.** We use Google Analytics 4 to understand how visitors interact with our website — which pages are viewed, how long visitors stay, and general device and location information. We use this to improve our website and services. These cookies are only placed with your consent.
- **Marketing cookies.** We may in future run advertising campaigns, including on LinkedIn, and place tracking technologies to measure their effectiveness. Where we do so, these cookies are only placed with your consent and this statement will be updated to describe them.

You can accept, refuse, or change your cookie preferences at any time via the cookie banner on our website. Refusing analytics or marketing cookies does not affect your ability to use the site or to download our reports.

WHO WE SHARE DATA WITH

We do not sell personal data. We share it only where necessary, and only with the following categories of recipients:

- **IT and software providers** who host our systems and enable us to work — including our e-mail and office software, file storage, website platform, and the tools we use to handle website forms and send requested content. These parties act as processors on our instructions, under a data processing agreement.
- **Analytics providers** — currently Google, for website analytics.
- **Professional advisers** such as our accountant or legal counsel, where necessary.
- **Public authorities** where we are legally obliged to disclose data.

Job application data is seen only by the people involved in that specific recruitment — typically the hiring manager and the selection team. We do not share it outside Conceptional.

Where a third party acts as a processor, we conclude a data processing agreement requiring them to protect your data and to process it only on our instructions.

TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Some of our providers process personal data outside the European Economic Area, including in the United States. This applies in particular to Google Analytics.

Where personal data is transferred outside the EEA, we rely on one of the safeguards permitted under Chapter V of the GDPR — an adequacy decision of the European Commission (such as the EU-US Data Privacy Framework), or the European Commission's Standard Contractual Clauses combined with additional technical and organisational measures.

HOW WE PROTECT YOUR DATA

We store personal data in secured digital environments and apply appropriate technical and organisational measures, including access control on a need-to-know basis, encrypted connections, multi-factor authentication on our business systems, and regular review of who has access to what.

If a data breach occurs that is likely to result in a risk to your rights and freedoms, we will report it to the Autoriteit Persoonsgegevens and, where required, inform you directly.

RETENTION

We do not keep personal data for longer than is necessary for the purposes for which it was collected. Specific retention periods are set out in the table above. Where a statutory retention obligation applies — for example Dutch tax and accounting law — we keep the data for the period the law requires.

IS PROVIDING YOUR DATA MANDATORY?

Providing personal data is always voluntary. However, if you do not provide the details we ask for, we may not be able to respond to your enquiry, send you the report you requested, consider your job application, or enter into and perform an agreement with you. Accepting analytics or marketing cookies is entirely optional.

AUTOMATED DECISION-MAKING

We do not use automated decision-making or profiling that produces legal effects for you or otherwise significantly affects you. In particular, we do not use automated tools to screen, rank, or reject job applicants — every application is reviewed by a person.

YOUR RIGHTS

Under the GDPR you have the following rights in relation to your personal data:

- **Access.** To ask what personal data we hold about you and receive a copy.
- **Rectification.** To have inaccurate or incomplete data corrected.
- **Erasure.** To have your data deleted, where one of the grounds in Article 17 GDPR applies.
- **Restriction.** To ask us to limit our processing of your data in certain circumstances.
- **Data portability.** To receive data you provided to us in a structured, commonly used, machine-readable format, and to have it transmitted to another controller.
- **Objection.** To object to processing based on our legitimate interest. You always have the right to object to processing for direct marketing purposes, and we will stop immediately.
- **Withdrawal of consent.** Where processing is based on your consent — for example analytics cookies, or keeping your application on file — you may withdraw it at any time. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, contact us using the details under “Who we are” above. We will respond within one month. We may ask you to verify your identity before acting on a request.

QUESTIONS AND COMPLAINTS

If you have a question or concern about how we handle your personal data, please contact us first — we would like the chance to resolve it. You also have the right to lodge a complaint with the Dutch supervisory authority, the Autoriteit Persoonsgegevens (autoriteitpersoonsgegevens.nl), or with the supervisory authority in your country of residence.

CHANGES TO THIS STATEMENT

We may update this statement to reflect changes in our services, our systems, or the law — for example when we begin running advertising campaigns. The current version and its effective date are shown in the document control table above. We encourage you to review this statement periodically.