

PRIVACY STATEMENT ALTURA

last updated September 2023

INTRODUCTION

Altura B.V. (“**Altura**” and “**we**”) is committed to use personal information in a professional and responsible manner and to act in accordance with applicable data protection legislation, including the General Data Protection Regulation (EU 2016/679) (“**GDPR**”).

“**Platform**” refers to the Altura platform, accessible via the URL www.altura.io and any other URL redirecting to it (“**Website**”). “**You**” refers to Users of our Platform.

In this Privacy Statement we explain what personal data we collect and use, the purposes we need such information for and who we share your information with. It also contains your rights in relation to your personal information.

DATA CONTROLLER

Under data protection legislation, we need to disclose the details of the entity responsible for your personal information. Altura B.V. is your data controller. Altura B.V. is based in the Netherlands and registered under number 82677530 at the Dutch Chamber of Commerce (KvK). Our contact details are:

Jaarbeursplein 6, 3521 AL Utrecht, The Netherlands

support@altura.io

APPLICABILITY

This Privacy Statement is applicable to each and every use of our Platform and to your communications with us.

THE PERSONAL DATA WE PROCESS AND THE LAWFUL BASIS WE RELY ON

Personal data is any information from which a person (a data subject) can be identified or potentially identified from.

We collect and process information and documents which may contain personal data. It depends on the functionalities and tools you use whether or not we process personal data and if so, what personal data. We may collect and process personal data in the following situations.

Communications with us

When you contact us by submitting the contact form on our Website or when you email or call us, we process your name and email address at a minimum. You may also provide us with other information which contains personal data. We use your personal data to be able to communicate with you about your query. Unless you are a registered User with a paid account, we delete your personal data once your query is handled and you don't plan to use our services. If you are a User with a paid account, we will usually already have stored your name and email address for that purpose and therefore we will keep that personal data for longer (please also see the paragraph below about setting up an account). The personal data are processed based on our legitimate interest to handle your request and to communicate about it with you.

Setting up an account

If you wish to use all features and functionalities of our Platform you must register with an account. In order to set up an account, we require certain personal data from you, such as the name, email address and telephone number of an employee. Without those personal data, we are not able to offer our services. This personal data is processed based on the performance of a contract (and entering into that contract) and our legitimate interest to communicate with you about our services.

Use of tools

We offer various tools through our Platform. Users can also upload documents in relation to a tender. Such documents may contain personal data.

When you use one of our tools, we are both a data controller and a data processor of the personal data provided to us through those tools. You are the data controller and we are the data processor of the personal data you provide us with. When you upload documents and when you use our tools, we are merely processing the personal data involved at your instruction and on your behalf solely for the purposes that you choose (the use of a certain tool). This processing is subject to our data processing agreement (please refer to the separate data processing agreement).

On the other hand, we use the personal data you provide us with for our own purposes using the means we have determined, being the further development of our services and products as well as the development of our algorithms. Both purposes are ultimately to the benefit of our clients. For this processing, we are the data controller and this Privacy Statement is applicable to such processing. The processing of your personal data for these purposes is based on our legitimate interest to continuously improve our services and products, so that our clients are served in the best possible way.

Website visits

When you visit our Website we may collect some data in the background using technologies such as cookies (please also refer to our Cookie Statement).

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device. More information on how to turn on and off cookies and to delete them can be found in the instructions of your browser.

Cookies and similar technologies may store information about your IP-address, browser, device and pages you visit and on how you navigate our Website.

This information is used by us to put together statistics about the use of our Website and Platform. We process this information based on our legitimate interest to improve our Website and Platform and improve the user experience.

WITH WHOM WE SHARE PERSONAL DATA

In order to offer our Platform and services in the best way possible, we partly rely on third-party providers. Such third parties, for example our hostingprovider, carry out activities at our instruction and on our behalf. They act as data processors when personal data are shared with them. We conclude data processing agreements with such third parties including clauses to safeguard the security and privacy of your personal data.

We will also share your personal information with law enforcement or similar authorities at their request if required by applicable law.

The third-party service providers we work with only process personal data within the European Economic Area (EEA). In case we would start working with providers with processing activities outside of the EEA, we will notify you in advance. In that case, we will always make sure that the required level of protection of your personal data is met in that particular country, for example using standard contractual clauses approved by the European Commission, but this may also involve other mechanisms.

We will never sell your personal information to anyone.

SECURITY MEASURES

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We comply with the ISO27001 security standards. At Altura, we limit access to your personal information to those staff members who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. The security of our Platform's IT-infrastructure is professional. We have procedures in place to deal with any (suspected) data security breach. We will notify our clients and the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) of a suspected data security breach where we are legally required to do so.

RETENTION PERIOD

We do not hold your personal data for any longer than necessary for the purposes your data were collected for, as explained in this Privacy Statement, unless we are under a legal obligation to retain your personal data for a longer period. For example, financial regulations require us to retain certain information of our clients for a period of seven years. These data will only be permanently deleted after that period has expired. We may also anonymise personal data after a certain amount of time and use it for research. Anonymous data are no longer considered personal data, so we do not need a lawful basis to process that data.

YOUR RIGHTS

Data protection laws give you a set of rights you can enforce against us without costs. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

If you wish to exercise any of the below rights, please let us know your request by email.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within 14 days. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the following rights:

- **Right to information:** this Privacy Statement is designed to inform you about the processing of your personal data, including our identity, the purposes we use your personal data for, the lawful basis we rely on to process personal data, and the rights you have under data protection laws.
- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.

- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

COMPLAINTS

If you have any questions about this Privacy Statement or if you have a complaint about the way we deal with your personal data, please contact us and give us a chance first to solve your question or complaint. You also have the right to lodge a complaint with the Dutch Data Protection Authority, the Autoriteit Persoonsgegevens (www.autoriteitpersoonsgegevens.nl).

CHANGES TO THIS STATEMENT

We may make changes to this Privacy Statement from time to time, for example to reflect amendments in legislation or a change in the way we do business. We have the right to make such changes without giving you prior notice.

You can always find the most recent version of this Privacy Statement on our Website. We will also notify Users with an account of any material changes we make by e-mail.