

1. INTRODUCTION

Hammerfest B.V. is a social advertising agency based in Amsterdam (hereinafter referred to as: "Hammerfest" or "we"). As part of our business we process personal data. This privacy agreement informs you on how we deal with personal data. We explain, among others:

- **Which type of personal data** we process per category of persons;
- For **what purposes** and based on **which ground** we process that personal data;
- The recipients with whom we can **share** personal data;
- How we **secure** personal data;
- **Which rights** people have with regard to their data we process;
- Who you can **contact** about our privacy agreement and the way we process your personal data.

2. OUR CONTACT INFORMATION

Hammerfest B.V.
 Cruquiusweg 109-C
 1019 AG Amsterdam
 hello@hammerfest.co
 +31 (0)20 233 8564

3. CATEGORIES OF PERSONS

We process personal data of the following categories of persons:

CLIENTS – Persons who are clients or work for clients.

SUPPLIERS – Persons from whom we obtain products or services or persons that work for our suppliers.

JOB APPLICANTS – Applicants or persons who are looking to apply for a job at hammerfest.

EMPLOYEES – Persons who work at our company, freelancers included.

THIRD PARTIES – Other persons, such as persons who appear in advertising materials we produce, subscribers to our newsletter or visitors of our website.

4. THE PERSONAL DATA WE PROCESS

Below we give an overview of the personal data we process per category of persons.

CATEGORY OF PERSONS	PERSONAL DATA WE PROCESS
CLIENTS	<ul style="list-style-type: none"> • Contact details, such as names, addresses, phone numbers and email addresses; • Payment details, such as bank account numbers; • Other data of which processing is necessary for compliance with a legal obligation.
SUPPLIERS	<ul style="list-style-type: none"> • Contact details, such as names, addresses, phone numbers and email addresses; • Payment details, such as bank account numbers; • Other data of which processing is necessary for compliance with a legal obligation.

JOB APPLICANTS	<ul style="list-style-type: none"> • Contact details, such as names, addresses, phone numbers and email addresses; • Data from the job application and/or resumé, such as data on followed courses, trainings and internships and (if applicable) current employers; • Other data of which processing is necessary for compliance with a legal obligation.
EMPLOYEES	<ul style="list-style-type: none"> • Contact details, such as names, addresses, phone numbers and email addresses; • Data from your job application form and/or CV, such as data on followed courses, trainings and internships and (if applicable) current employers; • Bank account number; • Identification documents; • Other data of which processing is necessary for compliance with a legal obligation.
THIRD PARTIES	<ul style="list-style-type: none"> • Contact details, such as names, addresses, phone numbers and email addresses; • Data as a result of a visit to our website, such as data that is processed to keep a record of the number of visitors of our website; • Other data provided by clients or third parties or obtained from public resources.

5. THE PURPOSES AND LEGAL BASES FOR PROCESSING THE DATA

We can only process personal data if there is a legal basis for processing. Therefore, we only process the abovementioned data when:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, for example keeping contact reports for a client or conducting a job application procedure (hereinafter referred to as: "performance of a contract");
- processing is necessary for the compliance with a legal obligation to which we are subject, such as our obligation to include a copy or scan of an identification of our employees in our payroll administration in compliance with the Dutch Wages and Salaries Tax Act (hereinafter referred to as: "legal obligation");
- processing is necessary for the purposes of the legitimate interests pursued by Hammerfest or by a third party, such as the use of contact details to send our newsletter (hereinafter referred to as: "legitimate interest"); or
- the data subject has given consent to the processing of his or her personal data for one or more specific purposes (hereinafter referred to as: "consent").

Below is stated per category of persons for which purposes and on what legal basis the personal data will be processed:

CATEGORY	PURPOSE	LEGAL BASIS
CLIENTS	The supply of our products and services to the client	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	The collection of fees and making payments	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	Communications with the data subject	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	The application of laws or regulations	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest

CATEGORY	PURPOSE	LEGAL BASIS
SUPPLIERS	Placing orders or purchasing services	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	Communications with the data subject	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest
	Making payments	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	The application of laws or regulations	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest
JOB APPLICANTS	Assessing the suitability of a job applicant for a position	<ul style="list-style-type: none"> • Performance of a contract • Legal obligation • Legitimate interest
	Communications with the data subject	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	The application of laws or regulations	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest
EMPLOYEES	Granting access to our office or our website or for the security of both	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest
	Calculating or registering income and expenditure and making payments	<ul style="list-style-type: none"> • Performance of a contract • Legal obligation • Legitimate interest
	The application of laws and regulations	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest
THIRD PARTIES	The supply of our products and services to the client	<ul style="list-style-type: none"> • Performance of a contract • Legal obligation • Legitimate interest
	Communications with the data subject	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest
	Maintaining contacts and sending information regarding the services of Hammerfest	<ul style="list-style-type: none"> • Consent • Legitimate interest
	The application of laws and regulations	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest

6. WITH WHOM WE CAN SHARE PERSONAL DATA

Below we provide an overview per category of persons of the recipients we can share the personal data with.

CATEGORY OF PERSONS	PERSONAL DATA WE PROCESS
CLIENTS	<ul style="list-style-type: none"> • Our employees (especially persons engaged in communicating with clients); • Suppliers (for example consumer research agencies); • Others, with the consent of the data subject, or in the case of a legal obligation.
SUPPLIERS	<ul style="list-style-type: none"> • Our employees (especially persons engaged in placing orders and buying products and services); • Others, with the consent of the data subject, or in the case of a legal obligation.
JOB APPLICANTS	<ul style="list-style-type: none"> • Our employees (especially persons from the agency engaged in the job application process); • Others, with the consent of the data subject, or in the case of a legal obligation.
EMPLOYEES	<ul style="list-style-type: none"> • Our employees; • (Pension) insurance companies; • Parties that supply external back-office-services; • Others, with the consent of the data subject, or in the case of a legal obligation.
THIRD PARTIES	<ul style="list-style-type: none"> • Our employees; • Suppliers (for example the party that keeps our website usage statistics); • Others, with the consent of the data subject, or in the case of a legal obligation.

These parties may be located in the Netherlands, other countries in the European Economic Area or elsewhere in the world. Where personal data is stored by us outside the EEA, we will ensure an appropriate level of protection for the data transferred. We require service providers and other service providers to take appropriate measures to protect the confidentiality and security of personal data.

Where such international data transfers take place from an EEA country to a recipient in a country with a different data protection regime, we will ensure that this international data transfer does not adversely affect the level of protection of personal data by taking additional appropriate measures.

7. HOW WE SECURE YOUR PERSONAL DATA

7.1 Hammerfest applies technical and organisational measures to secure personal data from accidental or unlawful destruction, loss, alteration or unauthorised distribution or unauthorised access. Our employees are bound to confidentiality, and are obligated to follow our instructions concerning adequate protection of personal data.

8. COOKIES ON OUR WEBSITE

8.1 Cookies are small text files which are stored by websites on a user’s computer or other device that is used to visit the website. This way, (personal) data can be collected. Our website uses 2 types of cookies:

1. Analytics cookies
2. Marketing cookies

8.2 Below is an overview of the cookies used on our website.

ANALYTICS COOKIES

Analytics cookies help website owners to understand how visitors interact with websites. We use Google Analytics, a service that offers insights into how our website is used. This involves user statistics such as the amount of different visitors, the pages that are frequently visited and the average duration of a visit. We have signed a data processing agreement with Google to ensure that personal data collected with Google Analytics will only be used to offer insights into the way our website is used. We also adjusted the settings of the service so that other Google-services are not allowed to use the data, and the last digits of all IP addresses collected on this basis are immediately deleted to make it more difficult to trace them back to a specific visitor.

ANALYTICS COOKIE	PURPOSE	EXPIRATION
_GA	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	2 years
_GID	Store and count pageviews	1 day
_GAT	Read and filter requests from boths	1 minute

MARKETING COOKIES

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

MARKETING COOKIE	PURPOSE	EXPIRATION
_FBP	Store and track visits across websites	3 months

9. PERSONAL DATA RETENTION

9.1. We process personal data no longer than necessary for processing purposes mentioned in this privacy statement. This means personal data will be stored for as long as necessary to accomplish the relevant purposes. Some data has to be stored for a longer period of time, because we are bound by statutory retention obligations.

10. YOUR RIGHTS RELATED TO YOUR PERSONAL DATA

10.1 You have the following rights concerning personal data related to you:

- a. You have the following rights concerning personal data related to you:
- b. The right to get an answer on whether personal data that concerns you will be processed or not, and, if it will, the right to access such data;
- c. The right to request rectification of said personal data;
- d. The right to request to delete said personal data;
- e. The right to object to the processing of said personal data;
- f. The right to request a restriction of the processing of said personal data;
- g. The right to withdraw consent to the processing of said personal data if the processing is based on consent;
- h. The right to receive said personal data or to forward said personal data to an organisation of your choosing, in a structured, customary and machine-readable form, and to the extent you yourself provided said personal data to the controller;
- i. The right not to be subject to a decision based on a solely automated processing, including profiling, of said personal data that has legal effects or that affects him in a different way to a considerable degree;
- j. Depending on the country where you live, the right to lodge a complaint with a supervisory authority that supervises compliance with the rules regarding the protection of personal data. In the Netherlands this supervisory authority is the Autoriteit Persoonsgegevens in The Hague. (www.autoriteitpersoonsgegevens.nl).

10.2 Hammerfest will deal with a request related to the performance of these rights in the manner prescribed by law. These rights do not apply under all circumstances and the applicable regulations provide for the necessary exceptions. If we will not meet a request, we will explain why.

12. CONTACT DETAILS

To exercise the abovementioned rights you can send an email to **privacy@hammerfest.co**. You can also use that email address to file a complaint on the way Hammerfest processed your personal data. If you are not satisfied with the way your complaint is handled by us, you can file a complaint at the Dutch supervisory authority: the Autoriteit Persoonsgegevens or, if you live or work in another country within the EEA, at the data protection supervisor of that country.

13. CHANGES TO THIS PRIVACY STATEMENT

13.1 We may amend this privacy statement from time to time. New versions will be published on the website. We recommend to regularly review this statement in order to remain informed of any changes.

13.2 This privacy statement was last amended on 17 November 2021.