



# Privacy Statement

Version: March 14, 2019



# Table of Contents

<b>Privacy Statement of Bol Adviseurs .....</b>	<b>3</b>
Purposes of the processing of personal data .....	3
Use of personal data.....	4
Providing personal data to third parties.....	5
Personal data retention periods .....	6
Safeguarding the security of personal data .....	6
Access to, correction or erasure of personal data, right to object, right to restriction of processing and right to data portability .....	7
Complaints about the use of your personal data .....	7
<b>Finally .....</b>	<b>7</b>
Changes in this privacy statement.....	7
More information or questions about your data or this statement.....	7



# Privacy Statement of Bol Adviseurs

With this privacy statement, we would like to inform you about which personal data Bol Adviseurs processes for which purpose. Bol Adviseurs supports clients in all facets of entrepreneurship. We process personal data in the course of the performance of our service provision but also in relation to the use of our website. When processing personal data, we limit ourselves to the personal data required for the purposes for which it is processed.

We respect the privacy of our clients, employees, business contacts and visitors to the website. Personal data is therefore handled and secured with the greatest possible care and processing takes place in accordance with the applicable privacy legislation. Bol Adviseurs advises and supports entrepreneurs from its [offices](#) in Boxmeer, Venray, Nijmegen, Veghel and a satellite office in Amsterdam. The nature of the service provision ensures that in the context of the GDPR, the organisation views itself as the 'controller'. (For more information on this issue please read the infodoc ['Bol Adviseurs and the GDPR'](#)).

## Purposes of the processing of personal data

Bol Adviseurs has all the required expertise available to support and advise entrepreneurs (and those supporting them) on divergent issues. Our professionals provide support in realising ambitions and taking our clients' entrepreneurship to a higher level. Our service is aimed at handling issues in the business where relationships between people, numbers and/or money play a role. Our service contributes to the optimisation of our clients' entrepreneurship within five dimensions of their entrepreneurship:

- Entrepreneur
- Business
- Private and Commercial
- Personnel
- Conducting international business

Implementation of this service provision in a professional manner requires the processing of personal data of our clients. This covers issues such as the preparation and audit of financial statements, filing tax returns, handling accounting records and salary administration, providing assistance during company takeovers, providing advice on legal, tax, international, IT, HRM, financial and organisational issues, carrying out IT audits and coaching or training entrepreneurs or their employees.



We also process personal data of persons who work at our clients. This is necessary to be able to deliver our service, which is related to personnel affairs, properly. In this situation, we will not always receive the relevant data directly from the relevant persons (data subjects), but from our client. We will therefore always request our clients to notify the relevant data subjects in writing about this work and of the associated personal data processing that follows.

Where relevant, we also process the personal data of the data subjects at our clients to be able to provide relevant information about our service provision and activities directly to these persons. We also do this to be able to maintain business relationships with them. Finally, processing of personal data is required when employees and clients use our online tools. In that case this is in order to be able to share information with the relevant people related to the use of this software.

From a marketing purpose perspective we can use the collected personal data for the sending of information, invitations or announcements. For existing business contacts, this is done on the basis of the justified interest. In other cases, this is only done with express permission. It should be noted that it is always possible to request that such information be stopped from being sent. This can be done simply by using the unsubscribe link found at the bottom (in the footer) of our e-mails.

We also process personal data in connection with compliance with laws and regulations, including the identification requirement under the Money Laundering and Terrorist Financing (Prevention) Act [*Wet ter voorkoming van witwassen en financieren van terrorisme* (*Wwft*)].

## Use of personal data

For particular cases, to carry out our services we require specific personal data. The type of data we process is dependent on the type of service we carry out. Only the personal data required for the relevant service will be processed. For each situation, we will indicate to our clients which personal data is required or compulsory and what the (possible) consequences are if the data is not provided. In the performance of our work, the following data may be processed:

- Name and address details
- E-mail address and other contact details including telephone number
- Birth details, age and gender
- Position and titles
- Level of education
- Citizen service number (BSN; only Dutch citizens)
- Nationality
- Identification details
- Registration number
- Financial details
- Business data, such as company register extract
- Bank and payment details



- Tax details, including VAT details and tax returns
- WOZ assessment (assessment under the Valuation of Immovable Property Act)
- Login details
- Notarial documents (a deed of formation/incorporation or living will for example)
- Data related to personnel, salary and sickness absence registration
- Contents of correspondence between Bol and its clients and the content of the (advice) file
- Contents of communication by e-mail, telephone or other means

To maintain business relationships, provide information about our service provision and provide information on online tools used by clients, we process the names, contact details and positions of the relevant persons who work at our business contacts.

In addition, Bol Adviseurs collects data about visitors to its website. This provides us with insight into information such as:

- date, time and duration of the website visit
- which pages the website visitor has viewed
- the material the visitor has downloaded on the website
- the used browser, the operating system and the service provider of the website visitor
- the place (municipality) where the visitor was located during their website visit
- any (source) link used by the website visitor to arrive at our website

The listed data is anonymised; it is therefore not possible for Bol Adviseurs to identify a visitor to the website.

Bol Adviseurs only collects information traceable to actual persons that has been expressly made available by the relevant visitor to the website. This is the case if a visitor completes a contact form on the website, for example. This information can consist of the name, position, business address e-mail address, telephone number(s) and details in relation to the internet behaviour such as set out in this statement.

The website of Bol Adviseurs also makes use of cookies, and various webpages contain social media icons and hyperlinks. For more information about cookies, social media icons or hyperlinks on Bol Adviseurs' website see our [cookie policy](#).

## Providing personal data to third parties

Personal data can be provided to third parties on the basis of a statutory provision or if this is necessary for providing the service. This includes providing the data to our software suppliers, government bodies, such as the Tax and Customs Authority and other business contacts, such as a bank or civil-law notary. Bol Adviseurs shall never provide personal data to third parties from a commercial point of view unless after explicit permission of the relevant persons (data subjects).



In addition, the provided data based on the use of our website is only ever passed on to third parties if this is necessary for the use or the optimisation of the website. For instance, we provide these details to our website and system manager and the (online) marketing firm.

If we provide personal data to a third party, we make sure that this personal data is not used for other purposes. We also agree with this third party that personal data is removed as soon as it is no longer required.

The provision of the personal data takes place on the basis of a justified interest, statutory obligation and/or for the performance of the agreement in accordance with the purposes as referred to in 'Purposes of the processing of personal data, or on the basis of the permission of the data subject. Processing on the basis of a justified interest takes place in the event of optimisation or improvement of the service provision by Bol Adviseurs. If personal data is processed on the basis of permission, the data subject may always withdraw the permission. In that case, Bol Adviseurs shall no longer process the relevant personal data. The withdrawal of consent does not have retroactive effect.

## Personal data retention periods

Within Bol Adviseurs, we keep personal data we receive in the context of our service provision for no longer than is necessary to realise the purposes for which the data is collected. This means that your personal data is kept for as long as it is required to reach the relevant purposes or must be kept in accordance with the statutory retention obligations. Bol Adviseurs will also not keep data it obtains from website visitors for longer than is necessary to realise the purposes for which the data is collected.

## Safeguarding the security of personal data

To secure personal data against loss or any form of unlawful processing we have taken suitable technical and organisational measures. Persons who have access to this data on behalf of Bol Adviseurs are under a duty of confidentiality (among other things, on the basis of the professional rules and rules of conduct applicable to them). We maintain high and generally accepted standards of technological and organisational security to protect the provided information against loss, abuse, unauthorised access, unwanted publication, unauthorised change or destruction.



## Access to, correction or erasure of personal data, right to object, right to restriction of processing and right to data portability

If we process your personal data, you have the right to request access to, correction and erasure of your personal data. You can also request us to transfer the provided personal data and you have the right to restrict the processing of your personal data. Finally, you have the right to object to the processing of personal data. You can address your request, objection or question to the privacy team of Bol Adviseurs, via [privacyteam@boladviseurs.nl](mailto:privacyteam@boladviseurs.nl). We will respond within one month at the latest. In the unlikely event that this will take longer, we will notify you of this. Each request, objection or question shall be processed individually. To prevent abuse, we may ask you for adequate identification.

## Complaints about the use of your personal data

If you have a complaint about how Bol Adviseurs uses your personal data or if you are not satisfied with our response after you have requested us to allow access to or allow correction of your personal data, please contact us first (or again). In this way, you will give us the opportunity to remedy the situation and/or assess whether we can meet your objection. Should this not be adequate enough for you, you can contact the Dutch Data Protection Authority [*Autoriteit Persoonsgegevens*]. For more information, please see [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

## Finally

### Changes in this privacy statement

This privacy statement was drawn up in March 2019. For various reasons, Bol Adviseurs can change this privacy statement from time to time. The most up to date version of the statement is always available on the website of Bol Adviseurs. Changes will therefore be published on our website.

### More information or questions about your data or this statement

If you have questions relating to the processing of your personal data within our organisation or you have privacy-related questions, please contact our privacy team on +31 (0)485 56 12 00 or via e-mail: [privacyteam@boladviseurs.nl](mailto:privacyteam@boladviseurs.nl).



More information about our cookie policy and our general terms and conditions can be found on our website. You can find this information via the links below or in the footer on [www.boladviseurs.nl](http://www.boladviseurs.nl):

- [Cookie policy »](#)
- [General Terms and Conditions »](#)