

## SIMPLE-SIMON'S EXTERNAL PRIVACY AND COOKIE POLICY

### 1 Introduction

1.1 This External Privacy and Cookie Policy ("**Policy**") is used by Mobile Operating B.V., trading as Simple-Simon (hereinafter: "**Simple-Simon**"). Simple-Simon's contact details are as stated below:

1.1.1 Office address:

Boschdijk 766  
5624 CL Eindhoven

1.1.2 Simple-Simon is registered with the company register of the Chamber of Commerce under registration number 17213276.

1.1.3 Simple-Simon can be contacted on [info@simple-simon.net](mailto:info@simple-simon.net) and on telephone number 0031-40-249 11 60.

1.2 In one respect, the Policy is intended to explain why and how data that identifies or could identify individuals ("**Personal Data**") is processed by Simple-Simon. Unless stated otherwise, Simple-Simon is the 'controller', as referred to in the General Data Protection Regulation ("**GDPR**") for the processing of the Personal Data as described in this Policy. In another respect, the Policy has been set up to inform you about the use of cookies and similar techniques on the website [www.simple-simon.net](http://www.simple-simon.net) (hereinafter: "**Website**") as operated by Simple-Simon.

### 2 Part I – Personal Data

2.1 Simple-Simon may process your Personal Data in the following situations:

2.1.1 You are a Simple-Simon customer;

2.1.2 You are a prospect of Simple-Simon;

2.1.3 You are a supplier of products or services to Simple-Simon;

2.1.4 You are an applicant at Simple-Simon.

2.2 The Personal Data processed by Simple-Simon may include:

2.2.1 Your first and last names;

2.2.2 Your address details;

2.2.3 Your gender;

2.2.4 Your date of birth;

2.2.5 Your e-mail address;

2.2.6 Your telephone number;

2.2.7 Your bank account number;

2.2.8 Any further personal data, depending on the type of relationship between you and Simple-Simon.

2.3 In addition to this Personal Data, you may possibly provide us with further Personal Data in your contacts with us, which includes the following categories of Personal Data:

2.3.1 The Personal Data obtained by Simple-Simon through your use of our Website, if you contact us or otherwise communicate with us, whether or not on behalf of a company.

### **3 Sources**

3.1 Simple-Simon basically collects Personal Data from you via the Website.

3.2 However, Simple-Simon does not collect your Personal Data if it is received from a customer or supplier, so as to enable Simple-Simon to fulfil the agreement with the relevant customer or supplier. For example, in the use of the Simple-Simon app, Simple-Simon acts as processor in the sense of the GDPR and the Simple-Simon customer is the controller in the sense of the GDPR. For questions about the processing of your Personal Data by a Simple-Simon customer, please refer to the privacy policy of the relevant customer.

### **4 Basic factors**

4.1 Simple-Simon collects Personal Data based on the following factors:

4.1.1 The processing is necessary for the execution of an agreement to which you, your employer or your client are a party, or to take measures at your request before the conclusion of an agreement;

4.1.2 On the basis of the legitimate interest of Simple-Simon as a commercial enterprise to be able to offer its services and to recruit staff, unless your interests or your fundamental rights and fundamental freedoms take precedence over those interests;

4.1.3 Where it appears necessary, Simple-Simon will request your additional permission for the processing of your Personal Data.

### **5 Purposes**

5.1 Simple-Simon processes Personal Data for the following purposes:

5.1.1 To enable Simple-Simon to execute the agreement with Simple Simon's customer (you, your employer, your client, etc.), such as, however, not limited to the license agreement for the use of the Simple-Simon application;

5.1.2 To enable Simple-Simon to recruit new employees;

5.1.3 To enable Simple-Simon to execute direct marketing activities, such as, however, not limited to informing you about our services, offers, possibilities and to verify the effectiveness of such communication;

- 5.2 The provision of the requested Personal Data under 4.1.1 is a necessary condition for entering into an agreement with Simple-Simon. If such information is not provided, Simple-Simon may not be able to comply with the obligations imposed on Simple-Simon by virtue of the (licence) agreement that has been or is to be concluded.

## **6 Data retention**

- 6.1 Simple-Simon shall not store the collected Personal Data longer than required for the purpose for which this Personal Data was originally collected. Personal data will never be retained for longer than the periods stated below, unless Simple-Simon has a legal obligation to keep this Personal Data for a longer period of time (for example for tax reasons) and unless you have given permission to keeping your Personal Data for a longer period of time.

- 6.2 The retention periods for the categories of Personal Data below are as follows:

- Personal data of (persons employed by) customers and suppliers: 2 years after the end of the last contract with Simple-Simon;
- Personal details of (people working at) prospects: 2 years after the last contact with Simple-Simon;
- Personal data of applicants: 4 weeks after the end of an application procedure;
- Personal data provided via the contact form on our Website or otherwise voluntarily provided to Simple-Simon: 1 year after the last contact with you.

## **7 Recipients and transfer**

- 7.1 Simple-Simon passes on Personal Data to third parties, so-called 'recipients', if this is necessary for the execution of the purposes mentioned in this Policy. The (categories of) possible recipients of the Personal Data are:

- 7.1.1 Our business relations, customers, suppliers and contractors, for the implementation of an agreement with Simple-Simon or in the context of our normal business operations with you, your client or your employer;
- 7.1.2 Our auditors, legal advisors and other advisers;
- 7.1.3 With regard to our Website: providers of tools to analyse the use of our Website under the conditions adopted in our cookie policy (see below);
- 7.1.4 Possible other recipients to which you expressly or implicitly agree to perform the Simple-Simon services for you or the company you are working for.

## **8 Possible recipients and transfers**

- 8.1 In addition to the recipients mentioned in Article 7, it is possible that Simple-Simon discloses or reveals Personal Data in the following cases:

- 8.1.1 In case Simple-Simon is involved in a purchase or sale of an enterprise, in which case Personal Data may be provided to the potential buyer and the Personal Data will be provided under this Policy;
- 8.1.2 In case Simple-Simon is required to provide Personal Data on the basis of a statutory obligation, or to execute the Policy, general terms and conditions of the agreement with you (or your employer or client), to warrant the rights, property and freedoms of Simple-Simon or its customers or others, Simple-Simon will also proceed to disclosure.

## **9 International transfer**

9.1 Simple-Simon does not transfer Personal Data to countries or international organisations outside the European Economic Area and uses data centres located in the Netherlands.

## **10 Security**

10.1 Simple-Simon highly values the security of Personal Data and has appropriate measures and safeguards for this in place. These measures meet the requirements set by the GDPR and include the following:

10.2 The measures taken include:

- All Simon websites, the commercial site, as well as the production sites work with Certificates to encrypt data
- If you apply for a free trial, you can set a password of your choice by yourself
- The data you create/manage with the Simon program is stored separately from other data
- Data exchange between the Simon app and Simon office program is also encrypted with Certificates
- The Servers used by Simple-Simon are managed by reputable external parties
- Physical access to the servers is managed by these external parties
- Access for management purposes is limited by whitelisting
- Networks are established through VPN connections
- The databases are backed up every night
- Visitors use a wireless network which is separate from the production network
- If the use of Simple-Simon is stopped, you are alerted to this and the data will be deleted if no reaction is received

## **11 Rights**

11.1 Subject to the situation and certain conditions, the GDPR gives the Data Subjects the following rights:

- 11.1.1 The right to request access to the Personal Data;
- 11.1.2 The right to request rectification of Personal Data;
- 11.1.3 The right to request removal of the Personal Data;
- 11.1.4 The right to request limitations to the processing;
- 11.1.5 The right to object to the processing;
- 11.1.6 The right to data portability;

- 11.1.7 Where the processing is based on permission: the right to withdraw the consent at any time, without prejudice to the legitimacy of the processing prior to this withdrawal;
  - 11.1.8 The right to lodge a complaint with a supervisory authority, such as the Dutch Data Protection Authority.
- 11.2 With respect to the implementation of these rights, Simple-Simon may request specific additional information. Such additional information is processed only for the purpose of exercising said rights. Simple-Simon may moreover refer you to its customer, because its customer, and not Simple-Simon, is to be qualified as the controller who will process your request.

## **12 Questions**

- 12.1 For questions about the processing of Personal Data by Simple-Simon and for requests regarding your Personal Data (as referred to in Article 11), you can contact Simple-Simon via the data stated in Article 1.1 of this Policy.

## **13 Part II – Cookie Policy**

- 13.1 Cookies are small packets of data that are sent to your browser and stored on the device used by you to visit different locations on the internet. Simple-Simon uses such cookies to ensure that the Website can be used as intended by Simple-Simon. For example, the cookies that are used ensure that contact details do not suddenly disappear. Other cookies make sure that the use of the Website can be analysed completely anonymously, that feedback can be given, messages shared on social media and that more relevant advertisements are shown on third-party websites.
- 13.2 Upon your first visit to the Website, you will be asked to agree to the use of cookies used by Simple-Simon through the Website. If you wish to withdraw your consent you can let us know and remove the placed cookies via the settings of your browser and cease the use of the Website.

## **14 Object**

- 14.1 Cookies are used by Simple-Simon on the Website with the object of:
- 14.1.1 Ensuring the best possible performance of the Website;
  - 14.1.2 Saving preferences, such as the language and location in order to have the Simple-Simon program work in accordance with these preferences;
  - 14.1.3 Making it possible to contact Simple-Simon via the Website;
  - 14.1.4 Analysing the use of the Website, and specifically targeted Work-Order Marketing purposes (advertisements relating to our work-order application);
  - 14.1.5 Creating statistics about the use of the Website.

## 15 The various cookies used

15.1 Below is an overview of the cookies placed, of their function and their life.

### 15.2 *Cookies to make sure that the Website performs properly*

These cookies are used to ensure that the Website performs properly. For example, cookies are placed to ensure that your contact details are remembered while you continue on the Website.

Simple-Simon uses the cookies below to make the Simple-Simon program accessible, starting from the Simple-Simon website

| <b>Placed by</b> | <b>Name of cookie</b> | <b>What's the cookie's function</b>   | <b>Length of time</b>   |
|------------------|-----------------------|---|---|
| Simple-Simon     | SimonStartApp         | Identifies the license and converts it into the customer's own appropriate environment. | 1 year, unless the customer deletes or causes to delete the license |
| Simple-Simon     | Office                | Identifies the user, authorisation.   | Until the browser is closed   |
| Simple-Simon     | SimonTZCookie         | Contains the time zone, offset in minutes.  | Infinite  |
| Simple-Simon     | SimonBOCookie         | The same as SimonStartapp cookie, is used when license server is offline.               | 1 year, unless the customer deletes or causes to delete the license |
| Simple-Simon     | BOSession             | ASP.NET session information.  | Until the browser is closed   |
| Simple-Simon     | BackOffice            | Identifies the user, authorisation.   | Until the browser is closed   |
| Simple-Simon     | SimonBOCookie         | The same as SimonStartapp cookie, is used when license server is offline.               | 1 year, unless the customer deletes or causes to delete the license |

### 15.3 Cookies to enable us to measure the Website's use

It is useful for Simple-Simon to know which parts of the Website are best viewed. Simple-Simon uses the software of a third party to measure this. In this way we are, for example, able to look at the number of visitors. From this information, statistics are drawn up that inform Simple-Simon about the use of its Website. It is not possible to reduce the statistics to a natural person.

| <b>Placed by</b> | <b>Name of cookie</b> | <b>What's the cookie's function</b>  | <b>Length of time</b>         |
|------------------|-----------------------|--|-------------------------------|
| Simple-Simon     | _ga                   | Used to distinguish visitors.  | 2 years                       |
| Simple-Simon     | _gid                  | Used to distinguish visitors.  | 24 hours                      |
| Simple-Simon     | _gat                  | Used to slow down the request speed.   | 1 minute                      |
| Simple-Simon     | _dc_gtm               | Ensures that the Google Tag Manager scripts can be loaded.                     | 1 minute                      |
| Simple-Simon     | NID                   | Showing relevant ads on Google.  | 30 days                       |
| Simple-Simon     | SID                   | Showing relevant ads on Google.  | 30 days                       |
| Simple-Simon     | AID                   | Link activities on different devices when signing in to a google account.      | Until the user has signed off |
| Simple-Simon     | DSID                  | Showing relevant ads on the Google search network for (re) marketing purposes. | Until the user has signed off |
| Simple-Simon     | TAID                  | Showing relevant ads on the Google search network for (re) marketing purposes. | Until the user has signed off |

|              |                |  |           |
|--------------|----------------|--|-----------|
|              |                |  |           |
| Simple-Simon | IDE            | Showing relevant ads on the Google search network for (re) marketing purposes. | 30 days   |
| Simple-Simon | LinkedIn Pixel | Tracking conversion data via LinkedIn ads & sponsored content.                 | 3 months  |
| Simple-Simon | Fr             | Tracking conversion data via Facebook ads & sponsored content.                 | 3 months  |
| Simple-Simon | MUID           | Used to make advertisements more appealing.                                    | 13 months |
| Simple-Simon | _uetsid        | Used to make advertisements more appealing.                                    | 1 day     |

#### 15.4 Cookies to share the contents of our Website via social media

Certain parts of the Website can be shared with others on social media via the social media buttons on our Website. Cookies are used by third parties, so the third party recognises you at the moment you want to share something. Third parties can collect Personal Data about you via the placed cookies. Further information about such collection and processing can be retrieved from the privacy statement of those third parties. Please note that these statements may be subject to change on a regular basis.

Simple-Simon uses these cookies for:

We refer to the following third parties for the relevant privacy statements:

- [Google](#)
- [Facebook](#)
- [LinkedIn](#)
- [YouTube](#)
- [Twitter](#)

## 15.5 *Other cookies*

Simple-Simon may not always be aware of the cookies that are placed by third parties via the Website. An example is the use of embedded elements on the Website. These are texts, images or films that are not stored with Simple-Simon or in the Website yet are shown via the Website. Should you encounter cookies on the Website that are included in this category and that we have not mentioned above, please let us know. Alternatively, you may want to contact the third party directly and ask which cookies they place, what reasons they have to do so, the cookie's life and how your privacy is guaranteed.

## 16 **Browser settings**

- 16.1 If you do not agree with the placement of cookies on your equipment and/or computer, you can adjust the browser settings so you receive a warning before cookies are placed. The settings can be adjusted so that the browser refuses all cookies, or only the cookies from third parties. It is also possible to delete already placed cookies. Please note: you must adjust the settings individually for each browser and every device you use.
- 16.2 It is important that you realise that if you do not allow cookies, we can no longer guarantee that the Website will be performing correctly or completely. Some functions may be lost or part of the website may no longer be visible. Refusing cookies does not mean that you no longer see ads, you will only no longer see personalised ads.
- 16.3 More information about the settings of your browser can be obtained via the help function of your browser.
- 16.4 The hyperlinks below go to pages about cookies for the most commonly used browsers.
- [Mozilla Firefox](#)
  - [Google Chrome](#)
  - [Internet Explorer](#)
  - [Safari](#)
- 16.5 If you want to turn off cookies from specific parties, you can do so via [Your Online Choices](#).

## 17 **Changes**

- 17.1 This Policy will have to be adjusted once in a while because of changes to the Website or the rules concerning cookies. Simple-Simon reserves the right to change this Policy without prior notice. This page shall at all times contain the most recent version of the cookie statement.

## 18 **Questions**

- 18.1 For questions about the use of cookies by Simple-Simon, please contact Simple-Simon via the details stated in article 1.1 of this Policy.