

Privacy Policy

1. General

In this privacy statement Twinxter provides information about the processing of personal data. Twinxter is located in The Netherlands and registered at the Dutch Chamber of Commerce under number 82248524. You may contact Twinxter via email: info@twinxter.com.

Twinxter is controller of the personal data that Twinxter generates or gathers via its website (www.twinxter.com), its online services, e-mail, SMS, and apps.

This privacy statement applies to the visitors of the website of Twinxter, the users of the online services of Twinxter, the clients of Twinxter and all persons of whom Twinxter processes and uses personal data with the exception of the persons employed by Twinxter. This privacy statement applies in addition to any data processing agreements Twinxter concluded with its clients.

2. Personal data

The personal data Twinxter processes and uses are (a) personal data you have submitted or provided via the website of Twinxter, online services of Twinxter, e-mail, SMS, apps or in another way directly or indirectly have provided (b) personal data that are generated by receiving electronic messages of Twinxter or your use of the website of Twinxter, online services of Twinxter, apps or similar applications.

Examples of personal data that you submit or provide to us using the online services of Twinxter: e-mail address, full name (first and family name), address, postal code, location and telephone number.

Examples of personal data are generated are: IP-address, surf behavior and other data regarding your use of the website of Twinxter, online services of Twinxter, apps or similar applications.

3. Use of personal data

Twinxter uses personal data for different purposes, which are described hereunder:

The personal data obtained or generated via the website of Twinxter, the online services of Twinxter, e-mail, SMS, apps:

- to deliver online services;
- to contact or keep contact with persons;
- to send newsletters, mailings or other relevant information or invitations for events;
- to inform persons about products and services of Twinxter;
- to inform persons about new developments and to share knowledge;
- to generate statistics on the use of the website and/or online services of Twinxter and/or to analyse and/or improve the website and/or online services of Twinxter

4. Using third parties

Twinxter may use third parties if it is required to deliver services, to support its operations (e.g. ICT-providers or business partners) or to comply with legal obligations. The third parties used by Twinxter will only process the personal data on the request and instructions of Twinxter. Twinxter will conclude a data processing agreement with those third parties.

5. Transfer outside the EEU (European Economic Union)

Personal data will not be transferred outside the EEU.

6. Cookies

The websites and the online services of Twinxter use functional and analytical cookies. Cookies are small (text)files that are stored on your computer, tablet or smartphone when using a website.

The functional cookies are used to facilitate easy use and experience of the website and online services of Twinxter and to adapt the use to personal preferences. The analytical cookies are used to keep track with statistics of the use of the website and the online services of Twinxter. Twinxter uses Google Analytics van Google, Inc. to this end. Twinxter has installed Google Analytics cookies in a 'privacy friendly' mode, in line with the user manual of the Dutch Data Protection Authority ('*Autoriteit Persoonsgegevens*'). This implies that the data collected by using Google Analytics are made anonymous as much as possible and that Google will never process the full IP, always masking the last octet of the IP-address. Google will not use the collected data for its own purposes as Twinxter has not granted its permission to do so. Twinxter does not use other Google-services in combination with the Google Analytics-cookies. The collected data are stored by Google on servers in the USA. Twinxter has concluded a processing agreement with Google, Inc. For more information: read the privacy policy of [Google Analytics](#). If you do not want to accept Google Analytics cookies please click [here](#). You can also switch off cookies in the settings of your browser and refuse all or only specific cookies. Please take into account that when you do not accept specific cookies, you might not be able to use specific functionalities of the website and/or the online services and this can limit the user friendliness of the website and/or the online services.

7. Correction/deletion personal data/complaints

- a) Every person has the right to have access and inspect in his/her personal data and to correct, add or block his/her personal data. If the person involved wants to use these rights, or if he/she has questions about this Privacy statement he/she may contact Twinxter via email: info@twinxter.com.
- b) Recipients of newsletters may unsubscribe by sending an email to: info@twinxter.com.
- c) If you have a complaint about the way Twinxter processes your personal data, you may contact Twinxter via email: info@twinxter.com. Should that not lead to a solution you may contact the Dutch Data Protection Authority 'Autoriteit Persoonsgegevens' (www.autoriteitpersoonsgegevens.nl).
- d) To ensure that your request to access and inspect your personal data is done by you personally, we request you to submit a copy of your passport/identity card to us. Please make black your photo, the MRZ (machine readable zone, the part in your passport with the numbers down below), passport numbers and social security number ('Burgerservicenummer') (BSN). This to protect and shield your privacy.
- e) Twinxter uses a number of techniques to ensure that the availability of your data is optimized constantly. To do so, we make daily copies of the data in our systems. The removal of data from these copies is technically and practically unfeasible. In line with the advice of the supervisory authorities Twinxter will keep track of your request to remove personal data. We will ensure that the data will be removed as soon as possible from the active systems. In the back-up copies however, the data will be kept. By installing a specific procedure, we have ensured that your data will not be put back or used in the active systems. For archive records we employ the same method

8. Storage period

Twinxter stores personal data no longer than required for the abovementioned purposes or as long as needed to comply with the laws and regulations.

9. Security

Twinxter has applied suitable technical and organisational measures to protect personal data from loss or unlawful processing, e.g. encrypting personal data, the use of passwords, sending personal data via a secured connection and the use of physical security for locations and rooms where personal data are stored.

10. How we contact you

- a) Sometimes Twinxter may contact you for various purposes. Despite the specific purpose, we will never ask you to send us personal data via email, text messages or a website. We will also not ask you to share login details with us.
- b) Should you doubt the authenticity of a message you received from us, please contact us via email: info@twinxter.com.
- c) We recommend you to manually type the hyperlink to a webpage that you receive via an email or another electronic communication source in address bar of your web browser.

11. Changes in the Privacy statement

- a) Twinxter reserves the right to change this Privacy statement. Every change will be communicated on this page. Twinxter recommends to regularly check this page to see whether changes have been made.
- b) The current privacy statement had been updated on 27 March 2021.