

Welcome to [www.kaya-consulting.com](http://www.kaya-consulting.com) (“the Website”) owned by:

Kaya Consulting

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When you convey information relating to an identified or identifiable natural person (“Personal Data”) on our Website or when using our services (“the Service”) we collect and process that information.

The protection of your Personal Data is important to us and we wish to explain how we handle your Personal Data.

Below you will find a description of the Personal Data we collect, for which purpose we process the Personal Data, how long we maintain the Personal Data, and if we share the Personal Data with others.

## **1. What kind of Personal Data do we collect?**

1.1 We collect the following Personal Data:

name, address, phone number and e-mail address

1.2 We collect this Personal Data when you sign up for the Services.

## **2. For which purpose do we use your Personal Data?**

2.1 We use your Personal Data to process your subscription to Services, handle complaints, provide support, send newsletters to you and to contact you at your request. We also use your Personal Data to answer any inquiries and to improve the contents of the Website and the Services. The information may also be used for statistics about the users of the Website and the Services.

## **3. We only process relevant Personal Data**

3.1 We only process Personal Data about you that are relevant and sufficient in relation to the purposes defined above. The purpose is crucial for the kind of data that is relevant to us. The same applies to the amount of Personal Data we process – we do not process more Personal Data than needed for the specific purpose.

## **4. We process only the required Personal Data**

4.1 We collect, process and store only the Personal Data acquired to meet our intended purpose in section 2.1. Additionally, it may be decided by law which data we are required to collect and store for our operation. The type and extent of the Personal Data we process may also be required to fulfil a contract or other legal obligation.

4.2 We want to ensure that we treat only the Personal Data necessary for each of our specific purposes. Therefore, our IT systems collect only the Personal Data necessary. It is also automatically ensured that the amount of processing is not unnecessarily large and the storage time is not too extensive.

4.3 To protect you from unauthorized persons accessing your Personal Data, we use IT solutions that automatically ensure that your data are only available to the relevant employees. There is also embedded protection against an unlimited number of persons receiving access to your Personal Data.

## **5. We amend any inaccurate Personal Data about you**

5.1 We verify that the Personal Data we process is accurate, and we make sure to update your Personal Data continuously. As the Services are dependent on your Personal Data being accurate and up to date, we ask that you provide us with relevant changes to your Personal Data so we can alter our register accordingly. You can use the contact details above to notify us of any changes.

## **6. For how long do we keep your Personal Data?**

6.1 We store your Personal Data for as long as you subscribe to the Services or as long as you subscribe to our newsletter. We delete your Personal Data at your request according to section 12.2 or no later than one year after the termination of your subscription to the Services, unless we are required to retain the Personal Data for a longer period of time according to legal requirements.

## **7. We will obtain your consent before processing your Personal Data**

7.1 We obtain your consent before processing your Personal Data for the purposes described above unless we have a legal basis for collecting them. If we collect your Personal Data on such a legal basis, we will inform you of such a basis as well as our legitimate interest in processing this Personal Data.

7.2 Your consent is voluntary and can be withdrawn at any time by contacting us. Please contact us on the following address, if you would like to withdraw your consent or have any questions concerning the above: [info@kaya-consulting.com](mailto:info@kaya-consulting.com).

7.3 If we wish to process your Personal Data for another purpose, we will inform you and obtain your consent before we begin processing of the Personal Data. If we have other legal grounds for processing your Personal Data than your consent, we will inform you accordingly.

## **8. We do not disclose your Personal Data without your consent**

8.1 In some cases, we will pass on the Personal Data to others. The passing on of Personal Data will take place to the extent and to whom it is necessary for us to provide you with the Services – and only upon your prior consent.

8.2 Your Personal Data may be passed on to: (i) suppliers with whom we cooperate to support our company (e.g. suppliers of services, technical support, delivery

services and financial institutions); or (ii) in connection with sales, assignments or prevailing other transfer of the contents of the Website; or (iii) if it is required by law, court order or by prevailing legislation.

8.3 As our business grows, we may sell and acquire businesses or assets. In connection with such transactions, customer information in general is one of the most attractive business assets. Personal Data collected with reference to this Privacy Policy will, if so, be passed on to the buyer acquiring our business or assets or to companies that we may acquire. We obtain your consent before disclosing your Personal Data to a third country party. If we pass on your Personal Data to a third country party, we make sure that their level of data protection will meet the requirements we have set out in this policy under the applicable law. We set requirements regarding, including, but not limited to, data processing, information security and fulfilment of your rights set out in this private policy.

8.4 If we transfer your Personal Data to collaborators or other parties, including for marketing purposes, we obtain your consent and inform you of how your data will be used. You may object to this kind of disclosure at any time and you can exclude yourself from marketing requests.

8.5 We will not obtain your consent if we are legally required to disclose your Personal Data, for example, as part of reporting to an authority.

8.6 We may use Sub-processors to provide our Service and you may find the current and updated list of Sub-processors here: [Sub-processors](#).

## **9. Data Security – what measures do we take?**

9.1 We take precautionary measures of technical and organizational nature to protect your Personal Data from manipulation, loss, destruction or access from unauthorized persons. Our precautionary measures are revised on a regular basis for us to meet the legislative requirements for a suitable data security system.

9.2 However, we cannot guarantee that the data are completely protected against individuals who want to and succeed in breaking our precautionary measures and gain access to transfer information on the Internet, e.g. via e-mail.

9.3 In case of a security breach that results in high risks of discrimination, ID theft, financial loss, loss of reputation or other significant inconvenience, we will notify you of the security breach without undue delay.

## **10. Cookies**

10.1 We do not use cookies

## **11. Access – you are entitled to access your Personal Data**

11.1 You are entitled to know which Personal Data we process about you, from where they originate and for which purpose we use them. We will let you know for how long we store them and who receives them.

11.2 At your request, we will disclose what data we process about you. Access may, however, be limited for the protection of other persons' privacy, trade secrets and intellectual property rights.

Please contact us by email [info@kaya-consulting.com](mailto:info@kaya-consulting.com) if you want to exercise these rights.

12. Rectification or Deletion – you are entitled to have inaccurate Personal Data corrected or deleted

12.1 If you believe that the Personal Data we treat about you are inaccurate, you are entitled to have them corrected. You can contact us and inform us of the inaccuracies and how they can be corrected.

12.2 In some cases, we will have an obligation to delete your Personal Data. This applies, for example, if you withdraw your consent. If you believe your data are no longer necessary for the purpose for which we obtained them, you may want to have them deleted. You may also contact us if you believe your Personal Data are being processed in violation of the law or other legal obligations.

12.3 When you convey a request by email to [info@kaya-consulting.com](mailto:info@kaya-consulting.com) to correct or delete your Personal Data to us, we will investigate whether the conditions are met and, if so, make changes or deletions as soon as possible.

13. Complaints – you are entitled to object to the processing of your Personal Data

13.1 You have the right to object to the processing of your Personal Data. You can also object to our disclosure of your data for marketing purposes. You can object by email [info@kaya-consulting.com](mailto:info@kaya-consulting.com). If your opposition is justified, we will stop processing your Personal Data.

14. Data portability – you are entitled to retrieve your Personal Data

14.1 You are entitled to receive the Personal Data you have made available to us and those, if any, we have collected from a third party based on your consent. If we process data about you as part of a contract to which you are a party, you have the right to receive these data as well. You also have the right to transfer these Personal Data to another service provider. If you wish to exercise your right to data portability, we will transfer your Personal Data to you in a commonly used format.

15. Contact us if you want to exercise your rights

15.1 Please contact us by email [info@kaya-consulting.com](mailto:info@kaya-consulting.com).

15.2 If you wish to access your data, have them corrected or deleted, or object to our data processing, we will investigate and respond to your request as soon as possible and no later than one month after we receive your request