# PRIVACY POLICY

#### 1 INTRODUCTION: ABOUT OUR PRIVACY POLICY

GP Elite Nederland B.V. cares about your privacy. We solely use your data to offer you our services and to improve these for your benefit. With the highest care we process the information we collect about you and your use of our services. We will never make your data available to third parties for commercial purposes.

This privacy policy applies to the use of this website and the underlying services provided by GP Elite Nederland B.V.. The starting date for the validity of these conditions is 25-05-2018 (25 May 2018), and with the publication of any new version the validity of all previous versions expires. This privacy policy describes what information about you is collected by us, what this information is used for, and with whom and under what conditions this information may be shared with third parties. We also explain to you how we store your data and how we protect your data against misuse and what rights you have with regard to the personal data you provide us with. If you have any questions about our privacy policy, please contact our contact person for privacy matters, you will find the contact details below, at the end of our privacy policy.

### 2 ABOUT OUR DATA PROCESSING

Below you can read how we process your data, and where we store it, which security techniques we use, and for whom the data is transparent.

# 2.1 WEBSHOP SOFTWARE

# **2.1.1 UMBRACO**

Our webshop has been developed with Umbraco software. Personal data that you make available to us for the benefit of our services will be shared with this party. Umbraco has access to your data to provide us (technical) support, they will never use your data for any other purpose. Umbraco is obliged to take appropriate security measures based on the agreement we have concluded with them. These security measures consist of the application of SSL encryption, a strong password policy and secure data storage. Umbraco reserves the right to share collected data within its own group and affiliated partners in order to further improve their services. Umbraco takes the applicable legal retention periods for (personal) data into account.

### 2.1.2 VBOXX

Our webshop has been developed with Umbraco software, we have chosen Vboxx for our web hosting. Personal data that you make available to us for the benefit of our services will be shared with this party. Vboxx has access to your data to provide us (technical) support, they will never use your data for any other purpose. Vboxx is obliged to take appropriate security measures based on the agreement we have concluded



with them. These security measures consist of the application of SSL encryption and a strong password policy. Regular backups are made to prevent data loss.

### 2.2 WEB HOSTING

#### 2.2.1 VBOXX

We use web hosting and email services from Vboxx. Vboxx processes personal data on our behalf and does not use your data for its own purposes. However, this party can collect metadata about the use of the services. These are not personal data. Vboxx has taken appropriate technical and organizational measures to prevent loss and unauthorized use of your personal data. Vboxx is obliged to observe secrecy based on our agreement.

#### 2.3 EMAIL AND MAILING LISTS

#### 2.3.1 MAILCHIMP

We send our email newsletters with MailChimp. MailChimp will never use your name and email address for its own purposes. You will see the "unsubscribe" link at the bottom of every email that is sent automatically by our website. You will then no longer receive our newsletter. Your personal data is stored securely by MailChimp. MailChimp uses cookies and other internet technologies that provide insight into whether emails are opened and read. MailChimp reserves the right to use your data to further improve the service and to share information with third parties in this context.

### 2.3.2 OFFICE365

We use the services of Office365 for our regular business email traffic. This party has taken appropriate technical and organizational measures to prevent misuse, loss and corruption of your and our data as much as possible. Office365 has no access to our mailbox and we treat all our email traffic confidentially.

#### 2.3.3 VBOXX

We use services from Vboxx for our regular business email traffic. This party has taken appropriate technical and organizational measures to prevent misuse, loss and corruption of your and our data as much as possible. Vboxx has no access to our mailbox and we treat all our email traffic confidentially.

### 2.4 PAYMENT PROCESSORS

# 2.4.1 BUCKAROO & SUMUP

We use the Buckaroo & Sumup platforms to (partly) process payments in our webshop and pin-debit transactions. Buckaroo & Sumup processes your name, address and residence details and your payment details, such as your bank account, debit card number or credit card number. Buckaroo & Sumup has taken appropriate technical and organizational measures to protect your personal data. Buckaroo & Sumup reserve



the right to use your data to further improve their services and to share (anonymised) data with third parties. In the event of an application for a deferred payment (credit facility) Buckaroo & Sumup share personal data and information regarding your financial position with credit rating agencies. All the above mentioned safeguards which regard the protection of your personal data also apply to the parts of Buckaroo & Sumup's services for which they engage third parties. Buckaroo & Sumup do not store your data longer than permitted by legal terms.

#### 2.5 SHIPMENTS AND LOGISTICS

### 2.5.1 POSTNL

In exceptional cases we use the services of PostNL to carry out deliveries. It is therefore necessary that we share your name, address and residence details with PostNL. PostNL only uses this information for the purpose of executing the agreement. In the event that PostNL engages subcontractors, PostNL will also make your data available to these parties.

#### 2.5.2 DHL

In exceptional cases, we use the services of DHL to carry out deliveries. It is therefore necessary that we share your name, address and residence details with DHL DHL only uses this information for the purpose of executing the agreement. In the event that DHL engages subcontractors, DHL will also make your data available to these parties.

# 2.6 INVOICING AND ACCOUNTING

# 2.6.1 SNELSTART

We use the services of Snelstart to keep track of our administration and accounting. We share your name, address and residence details and details regarding your order. This data is used for the administration of sales invoices. We share your name, address and residence details and details regarding your order. This data is used for the administration of sales invoices. Your personal data will be sent and stored protected. Snelstart is obliged to observe secrecy and will treat your data confidentially. Snelstart does not use your personal data for purposes other than those described above.

# **3 PURPOSE OF DATA PROCESSING**

### 3.1 GENERAL PURPOSE OF DATA PROCESSING

We only use your data for the benefit of our services. This means that the purpose of data processing is always directly related to the order you provide. We will not process more data from you than is strictly necessary for our services. In case we have concluded an agreement with you, we also use your data for



commercial purposes. If you no longer wish to use our mailing services you can unsubscribe from our mailing lists, or you no longer want to use our services you can send an email to info@gp-elite.nl.

For our services organization of motorsport events, it is necessary to collect the following data from you for the purpose of providing our services, invoicing and information provision:

### 3.1.1 FOR INVOICING:

(Company\*) Name

Contact person

Address

Postal code

City

\*VAT Number

Purpose: we need these data to make a legally correct invoice

### **3.1.2 FOR OUR INFORMATION SHARING BY MAIL AND SMS:**

Mobile phone number

**Email address** 

Purpose: We need this information to be able to provide you (actual, critical or general) information about our services and / or the event in which you participate, among other things, by email and telephone with the information.

### **3.1.3 ON BEHALF OF OUR SERVICES:**

Date of Birth (Season members only)

Car: Brand + Type

Registration number



Purpose: We need this information to be able to classify participants in a way that must adhere to our motorsport events. We store the date of birth data from our season members because they will receive a birthday present from us.

#### 3.1.4 ADDITIONAL DATA ON BEHALF OF THE KNAF RACING LICENSE PROGRAM:

Date of Birth

Data for medical record (these data are provided by us to the KNAF organisation, and will not be stored by us)

Passport Photo (these are sent by us to the KNAF organisation and will not be stored by us)

Purpose: This additional data is needed for the appliance of a KNAF racing license which we offer as an additional service for clients who follow the full racing license program.

Your data will not be shared with third parties, other than to meet accounting and legal or administrative obligations. These third parties are all bound by confidentiality based on the agreement between them and us, a judicial oath and / or legal obligation.

#### 3.2 AUTOMATICALLY COLLECTED DATA

Data that is being collected automatically by our website will be processed with service optimization in mind and for improvements only.

# 3.3 COOPERATION IN TAX AND CRIMINAL INVESTIGATIONS

In some cases, GP Elite Nederland B.V. is obliged to share your data in connection with government tax or criminal investigations based on legal obligations. In such a case, we are forced by law to share your data.

#### **3.4 RETENTION PERIODS**

We keep your data as long as you are our client. This means that we keep your customer profile until you indicate that you no longer wish to use our services. If you indicate this to us, we will also consider this as a request to be forgotten, which applies to the right to be forgotten. Based on applicable administrative obligations, we must keep invoices with your (personal) data, so we will keep this data for as long as the



applicable term runs. However, employees no longer have access to your client profile and documents that we have produced as a result of your assignment.

#### **4 YOUR RIGHTS**

Based on the applicable Dutch and European legislation, you have certain rights with

regarding the personal data processed by or on behalf of us. We explain below which rights these are and how you can invoke these rights. In principle, in order to prevent abuse, we will only send transcripts, duplicates or copies of your data to your already known email address. In case you wish to receive the data at a different email address or, for example, by postal services, we will ask you to identify yourself. We keep records of completed requests, and in case of a request for the right to be forgotten, we administer anonymous data. All transcripts and copies of you will receive data in the machine-readable data format that we use within our systems.

You have the right to file a complaint with the Dutch Data Protection Authority at any time if you suspect that we are using your personal data in the wrong way.

#### **4.1 RIGHT OF ACCESS**

You always have the right to check the data that we process or have processed that relate to your person or that can be traced back to you. You can submit a request to access your data to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a copy of all your requested data with an overview of the processors who have this data at the email address known to us, stating the category under which we have stored this data.

# **4.2 RIGHT TO RECTIFICATION**

You will always have the right to have the data that we process, or we have led processed, being rectified if this is data that is accounted for, or related to you personally or that this data can be traced back to you. You can submit a request for rectification of your data to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation that the details have been adjusted to the email address known to us.

#### 4.3 RIGHT TO RESTRICTION OF PROCESSING



You always have the right to limit the data that we process or the data that is related to you personally or data that can be traced back to you. You can submit a request for the restriction of processing your data by us to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation to the email address known to us that the data will no longer be processed until you cancel the restriction.

#### **4.4 RIGHT OF DATA PORTABILITY**

You always have the right to have the data that we process or the data we have led processed and that is related to you personally or data that can be traced back to you by another party being transferred to another party. You can submit a request to that effect to our contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, we will send you copies or copies of all information about you that we have processed or that have been processed by us by other processors or third parties to the email address known to us. In all likelihood, we can no longer continue the service in such a case, because the secure linking of data files can then no longer be guaranteed.

#### **4.5 RIGHT TO OBJECT AND OTHER RIGHTS**

In some cases, you have the right to object to the processing of your personal data by or on behalf of GP Elite Nederland B.V.. If you object, we will immediately stop the data processing pending the settlement of your objection. If your objection is well-founded, we will make transcripts, duplicates and / or copies of data that we process or have processed available to you and then permanently discontinue the processing. You also have the right to not to become subject to automated decision-making or profiling. We do not process your data in such a way that this right applies. If you believe this is the case, please contact our contact person for privacy matters.

### **5 COOKIES**

### **5.1 GOOGLE ANALYTICS**

Cookies from the American company Google are placed on our website as part of the "Analytics" service. We use this service to keep track of and receive reports on how visitors use the website. This processor may be obliged to provide access to this data on the basis of applicable laws and regulations. We have not allowed Google to use the obtained analytics information for other Google services.

### **5.2 THIRD PARTY COOKIES**



In the event that software solutions from third parties use cookies, this is stated in this privacy policy.

# **6 CHANGES TO THE PRIVACY POLICY**

We reserve the right to change our privacy policy at any time. However, you will always find the most recent version on this page. If the new privacy policy has consequences for the way in which we process already collected data relating to you, we will notify you by e-mail.

# **7 CONTACT DETAILS**

**GP Elite Nederland B.V.** 

J.P. Poelstraat 1

1483 GC De Rijp

Nederland

T 0031 (0) 299 77-6626

E info@gp-elite.nl

# **Contact person voor privacy matters**

Joey de Rooij

