

# Privacy policy Flow Ventures

<https://www.flowventures.xyz/>

## About our privacy policy

Flow Ventures cares about your privacy. We therefore only process data that we need for (improving) our services and carefully handle 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 the website FlowVentures.xyz and the services provided by it. The starting date for the validity of these conditions is February 2nd, 2021. The publication of a new version voids the validity of all previous versions. This privacy policy describes what data about you we collect, what this data is used for and with whom, and under what conditions this information can possibly be shared with third parties. We also explain how we store the data, how we protect it against misuse, and what rights you have in relation to the personal data you provide us with.

If you have questions about our privacy policy, please contact our contact person for privacy matters, you find the contact details at the end of our privacy policy.

## About the data processing

Below you can find how we process your data, where it is saved, which security techniques we use and to whom the data is made available.

### Web hosting

Our web hosting services are provided by SiteGround. SiteGround processes personal data on our behalf and does not use your data for their own purposes. However, SiteGround can collect metadata about the use of the services. Since metadata is anonymized, it is not classified as personal data. SiteGround has taken the appropriate technical and organizational measures to prevent loss or unauthorized use of your personal data. SiteGround is obliged to observe secrecy on the grounds of a non-disclosure agreement.

We use the services of Google's G Suite for Business for our regular business e-mail traffic. This party has taken the appropriate technical and organizational measures to prevent abuse, loss or corruption of your and our data as much as possible. Google has no access to our mailbox and all our email traffic is handled by us in strict confidentiality.

## Purpose of data processing

### General purpose of the processing

We only use your data to provide our services. Which means, the goal of the processing is always directly related to the assignment you provide. We do not use your information for (focused) marketing. If you share information with us and we need to use this data to contact you at a later time (other than at your request), we will always explicitly ask for your permission. Your data will be not shared with third parties, other than to comply with accounting and other administrative obligations. These third parties are all bound by either a confidentiality agreement with us or an oath or legal obligation required for their profession.

### Automatically collected data

Data collected automatically by our website is processed with the purpose Improving our services. This information (for example your IP address, web browser and operating system) is not personal data.

## **Participation in tax and criminal investigations**

In some cases, FlowVentures.xyz can be held to a legal obligation sharing your data in connection with government tax or criminal investigations. In such a case we are forced to share your data, but we will oppose this within the possibilities that the law offers us.

## **Retention periods**

We keep your information for as long as you are our client. This means that we keep your client profile until you state that you no longer wish to use our services. If you indicate this to us, this will also be considered a request to delete your data. On the basis of applicable administrative obligations, we submit invoices with your (personal) data, we will need to keep this information for as long as the applicable term is in effect. However, (our) employees no longer have access to your client profile and documents you have commissioned.

## **Your rights**

Based on the applicable Dutch and European legislation, you, as a data subject, have certain rights regarding the personal data processed by or on behalf of us. Below we explain which rights and how you can invoke these rights.

In principle, in order to prevent misuse, we will send copies of your data only to the e-mail address that we have verified as your e-mail address. In case you want the data to be sent to another e-mail address or, for example, by regular mail, we will ask you to identify yourself. We keep records of completed requests, and in case of a request for deletion we administer anonymous data. All copies of data you receive are 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 use your personal data improperly.

### **Right of inspection**

You always have the right to access the data that we process or have processed by third parties, and that relates to your person or is traceable to you. 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 (to your verified e-mail address) a copy of all data with an overview of the third parties that process this data, stating the category in which we have stored this data.

### **Rectification right**

You always have the right to request to change or adjust the data that we process or have processed by third parties, and that relates to your person or is traceable to you. 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 (to your verified e-mail address) confirmation that the details have been changed.

### **Right to restriction of processing**

You always have the right to restrict the data that we process or have processed by third parties, and that relates to your person or is traceable to you. 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 (to your verified e-mail address) confirmation that the specified data is no longer processed until you remove the restriction.

### **Right to transferability**

You always have the right to request the transfer of the data that we process or have processed by third parties, and that relates to your person or is traceable to you, to a third party of your choice. 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 (to your verified e-mail address) copies of all information about you processed by us or by third parties. In all likelihood, we can no longer continue our service in such a case, because the secure connection of data files can no longer be guaranteed.

### **Right of objection and other rights**

In some cases, you have the right to object to the processing of your personal data by, or at the behest of FlowVentures.xyz. If you object, we will immediately stop processing your data pending the settlement of your objection. If your objection is well-founded, we will provide you with copies of the data that we processed and then permanently discontinue the processing of your personal data.

In accordance with EU law, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you. However, we do not process your data in such a way that this right applies. If you do believe this is the case, please contact our contact person for privacy matters.

## Cookies

### **Google Analytics**

Through our website, cookies are placed from the American company Google as part of the "Analytics" service. We use this service to track and get reports on how visitors use the website. This company may be required to provide access to this data based on applicable laws and regulations in their country of establishment. We do not grant Google permission to use the obtained analytics information for other Google services.

### **Cookies from third parties**

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

## Changes to the privacy policy

We reserve the right to change our privacy policy at any time. On this page you will always find the most recent version. If the new privacy policy affects the way we already collect data in relation to you, we will notify you by email.

## Contact for privacy matters

Flowventures.xyz

Flow Ventures

Email: [hello@flowventures.xyz](mailto:hello@flowventures.xyz)