

PRIVACY POLICY AS SUPPORT B.V.

Versie 1.5

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Privacy policy AS Support

Introduction

AS Support B.V. respects the privacy of its customers and the end users of its services. In this privacy policy, we explain how we handle personal data, which data we process, and how we comply with the General Data Protection Regulation (GDPR).

What Data Do We Process?

AS Support processes personal data necessary for our services, such as:

1. **Contact details:** Name, address, email address, phone number.
2. **Financial data:** Information required for invoicing or for arranging mortgages or insurance.
3. **Technical data:** IP addresses, browser details, and log files.
4. **Sensitive data:** Financial information entered into tools or modules.

Social Media Integration

Our service offers optional integrations with social media platforms to publish news articles on your behalf. These integrations are only active when you choose to enable them yourself.

Socials Hub (Facebook Integration)

If you use the Socials Hub module (as registered with Meta) to publish news articles to Facebook, the following additional data is processed:

- **Facebook page IDs and access tokens** (stored in encrypted form only).
- **Name, email address, and (if relevant) profile information** of the account linked to the Facebook page, only as far as necessary for posting messages on your behalf.
- **News posts** published on Facebook via our service, including related metadata (publish time, post ID, etc.).

This data is used solely to publish news articles to your own Facebook page on your behalf and to manage your Facebook connection. We do not share data with Facebook except as strictly necessary for this functionality. You can disconnect Facebook at any time in your account settings.

Note: This processing only applies if you explicitly use the Facebook integration via Socials Hub. If you do not use this module, no Facebook-related personal data is processed or shared.

LinkedIn Integration

If you choose to use the option to automatically post news articles to your LinkedIn profile or page, the following applies:

- AS Support only receives and processes the data necessary to post news articles on your behalf via the LinkedIn connection.
- We do not share any other data with LinkedIn and will never post content without your permission.
- You can revoke this connection at any time via the platform or through your LinkedIn settings.

Instagram Integration

If you choose to use the option to automatically post news articles to your Instagram account, the following applies:

- AS Support only receives and processes the data necessary to post news articles on your behalf via the Instagram connection.
- We do not share any other data with Instagram and will never post content without your permission.
- You can revoke this connection at any time via the platform or through your Instagram settings.

Why Do We Process Personal Data?

We process personal data only for the following purposes:

- Delivering websites, tools, and modules to customers.
- Processing data necessary for the services of our customers (e.g., mortgage or insurance applications).
- Securing our services and systems.
- Supporting our customers with requests from end users (such as access or deletion requests).
- Improving our services based on technical usage statistics.

Controller and Processor

- **AS Support's customer is the data controller:** AS Support processes data on behalf of its customers (for example, data from end users entered via our tools).
- **AS Support is the processor:** We act only on instructions from our customers and take appropriate measures to secure personal data.

Legal Bases

We process personal data based on the following legal grounds:

- **Performance of a contract:** For example, to provide our services.
- **Legal obligations:** Such as fiscal retention requirements.
- **Legitimate interest:** Improving and securing our services.
- **Consent:** For specific processing, such as marketing.

Data Retention and Deletion

We do not retain personal data longer than necessary for the purposes for which it was collected:

- **Contact details:** Up to 1 year after termination of the contract, unless legally required otherwise.
- **Financial data:** 7 years, in line with fiscal obligations.
- **Technical data:** Up to 6 months after processing.

Immediately after termination of services, all personal data is securely and permanently deleted, unless otherwise agreed in writing.

Data Security

AS Support takes extensive technical and organizational measures to protect personal data against loss, misuse, and unauthorized access:

- Sensitive data is stored in encrypted databases.
- For hosting, data center, and CMS development, AS Support only partners with ISO 27001/NEN 7510 certified companies.
- Customers log in with username, password, and optionally 2FA (two-factor authentication).
- Access to personal data is strictly limited to authorized staff and certified partners, only as necessary to provide our services.

Rights of Data Subjects

End users have the following rights under the GDPR:

- **Access: The right to view their data.**
- **Rectification:** The right to correct inaccurate or incomplete data.
- **Erasure:** The right to have personal data deleted (“right to be forgotten”).
- **Restriction:** The right to restrict processing.
- **Portability:** The right to receive their data in a structured format.
- **Objection:** The right to object to processing based on legitimate interest.

Exercising Rights

Data subjects can exercise their rights by contacting us using the contact details in this policy. We respond to requests within 30 days. In exceptional cases, this period may be extended; we will inform the data subject in a timely manner.

Sub-Processors and Data Transfers

AS Support B.V. uses carefully selected certified partners (sub-processors) for parts of its services, such as hosting, data center services, and CMS management and development. For these sub-processors—including Rootnet B.V., BIT B.V., and LinkU B.V.—data processing agreements have been concluded, requiring them to protect personal data adequately and act in accordance with the GDPR.

For sending emails, AS Support B.V. uses SendGrid, based in the United States. Personal data such as email addresses and message content are only processed temporarily for email delivery. No data is stored at SendGrid after delivery; data is automatically deleted after sending, in accordance with SendGrid's policy. Transfers to the United States always take place with appropriate safeguards, such as the use of standard contractual clauses under the GDPR.

Data is otherwise only stored and processed within the European Economic Area (EEA). If processing outside the EEA is necessary, AS Support B.V. always ensures appropriate safeguards, such as using standard contractual clauses or working with parties in countries with an adequacy decision.

An up-to-date list of sub-processors is available upon request.

Data Breach Procedure

1. **Detection of a data breach:** Once a data breach is identified, AS Support records the incident in an internal log, including:
 - Date and time of discovery.
 - Data involved (if known).
 - Cause and impact of the breach.
 - In addition to data breaches, AS Support also informs customers of other serious security incidents that may affect the availability, integrity, or confidentiality of personal data.
2. **Notification to customers**
 - Within 48 hours of discovery, AS Support informs the customer of:
 - The nature of the data breach.
 - Which data may be affected.
 - Measures taken or recommended.
 - The notification includes sufficient detail for the customer (data controller) to comply with their own notification obligations.
3. **Measures**
 - AS Support immediately takes measures to stop the data breach and limit the impact. This may include:
 - Isolating affected systems.
 - Resetting access codes.
 - Adjusting security settings.
4. **Follow-up and reporting**
 - A full incident report is provided to the customer within 7 working days.
 - The report includes:
 - A summary of the incident.
 - Solutions implemented.
 - Any recommendations for future use.

Governing Language

This Privacy Policy is a translation of the original Dutch version. In case of discrepancies, the Dutch version shall prevail and is the legally binding document.

Contact Details

For questions about this privacy policy or to report incidents, please contact:

- AS Support B.V.
- Address: Frankenstraat 77, 6582 CW Heumen
- E-mail: servicedesk@assupport.nl
- Phone: +31(0)24-388 6998