

# PRIVACY POLICY

Esflow Technologies B.V. (“we, us, our”) is committed to protecting your privacy as a service user (“you, your”), while providing you with a hassle-free relocation. This document describes how we process your personal data in compliance with relevant laws, rules and industry standards.

## 1. Definitions

1.1 “You” - The user of the service via the Relocify application.

1.2 “Personal data” - Any information relating to an identified or identifiable natural person.

1.3 “Processing” - Any operation or set of operations which is performed on personal data or on sets of personal data.

1.4 “Service” - The complete Relocify service that is mainly chat-based via whatsapp and Redox. Other forms of communication may include email, video-calls or surveys.

1.5 “Third Vendor” - A third party that is used or recommended by Relocify to handle your requests or operate our service.

1.6 “Request” - The delivery and arrangement of products, services, and the provision of information conducted by Relocify upon request of the user, set up in advance in consultation with the employer of the user, available 24/7 by way of chat.

1.7 “Suggested to-do” - A suggestion is a to-do that you see that has not been activated yet. When you activate a suggestion it becomes a to-do, set up in advance in consultation with the employer of the user, available 24/7 by way of chat.

1.8 “To-Do” - A generic plan for a specific thing we can do to assist you in your relocation, including the specific steps we have to take, set up in advance in consultation with the employer of the user, available 24/7 by way of chat.

1.9 “Topic” - Topics provide all generic information you need about that part of your relocation, set up in advance in consultation with the employer of the user, available 24/7 by way of chat.

## 2. Scope of this policy

This privacy policy is applicable to all users of our Service, users of our website, Redox and any other associated websites and applications.

## 3. Data controller

The data controller responsible for the data processing is:

Esflow Technologies B.V.  
Herengracht 449 A  
1017 BR Amsterdam  
Nederland (Netherlands)  
Netherlands Chamber of Commerce registration number: 75821036

#### 4. Core principles

- 4.1 We will process your personal data lawfully, fairly and in a transparent manner.
- 4.2 We will only collect personal data for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 4.3 We will only ask you to provide data that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4.4 Your personal data shall be kept accurate and where necessary up to date.
- 4.5 Your personal data shall be kept in a form which permits identification for no longer than is necessary for the purposes for which the personal data are processed.
- 4.6 Your personal data shall be processed securely in accordance with relevant and applicable security standards.

#### 5. Data is processed for the following purposes

- 5.1 We limit the personal data collected and processed to the following purposes:
  - 5.1.1 The fulfillment of the contractual obligations we have with your employer, and to pursue our legitimate interests to introduce you to the service. In order to do so, your employer will provide us with your full name, email, your start date of employment, and depending on your employer your phone number (Article 6(1)(f) GDPR).
  - 5.1.2 To pursue our legitimate interests to carry out our obligations arising from any contracts entered into between your employer and us and to provide you and/or your employer with the information, products and services that you and/or your employer request from us, such as anonymized data reports (Article 6(1)(f) GDPR).
  - 5.1.3 To pursue our legitimate interests, we send you and your employer a personalized data report, which includes updates on the status of: overview service period, rent permanent living, arrange BSN & municipality registration, open bank account, arrange arrival transport, arrange utilities, school finding, and arrange health insurance. This report does not contain specific information. For example, we will include that you found a general practitioner, but not which one (Article 6(1)(f) GDPR).
  - 5.1.4 To fulfill our contractual obligations to you, we chat with you, handle and finalize your requests and to-do's. This may include the transfer of personal data to a Third Vendor (Article 6(1)(b) GDPR).
  - 5.1.5 To pursue our legitimate interests, we tailor our services to your needs, likings and interests. For example, we will store your address in order to find Third Vendors near your place of residence. (Article 6(1)(f) GDPR)

5.1.6 To fulfill our contractual obligations to you, we ensure that content from our service is presented in the most effective manner for you, your computer, tablet and mobile device (Article 6(1)(b) GDPR).

5.1.7 To pursue our legitimate interests, we evaluate and analyze your experience and the quality of our service using data and analytical tools (Article 6(1)(f) GDPR).

5.1.8 To fulfill our contractual obligations to you, we send you emails with updates on your transactions (Article 6(1)(b) GDPR).

5.1.9 To pursue our legitimate interests, and to fulfill our contractual obligations to you, we send you important information about changes in our service (Article 6(1)(b, f) GDPR).

5.1.10 To pursue our legitimate interests and to fulfill our contractual obligations to you, we resolve any bugs in our service (Article 6(1)(b, f) GDPR).

5.1.11 To pursue other legitimate interests or the legitimate interests of third parties. Legitimate interests include maintaining the functionality and security of our IT systems and improve the quality of our service (Article 6(1)(f) GDPR).

5.1.12 To comply with any legal obligation to which we are subject. These legal obligations include fiscal and criminal obligations (Article 6(1)(c) GDPR).

5.2 We will always ask for explicit consent for the processing of special categories as listed in clause 6.2 (Article 6(1)(a) GDPR).

5.3 You have the right to withdraw consent at any time. You can do so by sending a message in the Service, by sending an email to the data protection officer at [contact@relocify.nl](mailto:contact@relocify.nl), or by contacting your relocation coordinator.

5.4 General data reports will only contain anonymized data. Should this not be possible, we do not create a data report.

## 6. Categories of data

6.1. We may process the following personal data: client ID, name, date of birth, sex, phone number, email address, address, personal preferences; information provided by you, IP-address, device type, other meta data and communications between you and us.

6.2. We may process the following special categories of data: race, health, sexual orientation, financial information, governmental information

## 7. Sources of data

We receive data from multiple sources. The nature of the data, and the purpose of the processing may differ per the original source.

7.1 You may provide us with personal data in order to handle your Requests, fill-out preferences, or to evaluate the service.

7.2 Your employer may provide us with personal data in order to initiate your service period.

7.3 We receive data from your device and our system, such as your IP-address, device type, when you were last online and the amount of messages that are sent.

## 8. Analytics

8.1 We like to optimize our services for you, for this purpose we analyze the activity and happiness of our clients. The analysis of data is generally carried-out in-house.

8.2 We may use third party analytics services, to help analyse how you use our service. The information generated by the cookies or other technologies about your use of the service is transmitted to the analytics services. The analytics services use analytics Information to compile reports on product usage and activity.

## 9. Cookies

9.1 We do place first-party cookies on your device for authorisation purposes only. We notify you of this cookie on our homepage. This cookie is strictly necessary for the functioning of our website, and does not require your consent.

## 10. Data retention

10.1 We will delete your personal data from all servers 12 months after the expiration of your service period.

10.2 You may request us to delete your personal data at an earlier point in time by emailing the Data Protection Officer at [contact@relocify.nl](mailto:contact@relocify.nl).

10.3 We may have a legal obligation to retain personal data for a longer period to comply with applicable laws and regulations, such as fiscal legislation. In the event that such an obligation exists, clause 10.1 and 10.2 do not apply.

## 11. Automated decision making

We do not use automated decision making in our Service.

## 12. How can you reach our data protection officer?

If you have any questions or comments regarding this document, you can contact our data protection officer under:

Esflow Technologies B.V. Data Protection Officer  
Herengracht 449 A  
1017 BR Amsterdam  
Nederland (Netherlands)  
E-mail address: [contact@relocify.nl](mailto:contact@relocify.nl)

### 13. Rights of data subjects and how to exercise them

13.1 You have the right to information about the personal data stored by us. This copy includes the purpose of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been disclosed, the envisaged period for which the data will be stored, or the criteria used to determine that period, information as to the source of the data.

13.2 You have the right to obtain a copy of the personal data undergoing processing.

13.3 You have the right to rectification of incorrect data

13.4 You have the right to have your personal data erased.

13.5 You have the right to request a restriction on the processing of your personal data.

13.6 You have the right to receive the personal data concerning you, in a structured, commonly used and machine readable format and you have the right to transmit those data to another entity.

13.7 You have the right to file a complaint with the data protection supervisory authority, as elaborated on in clause 12 of this privacy policy.

13.8 You have the right to withdraw consent at any time. You can do so by sending a message in the Service, by sending an email to the data protection officer at [contact@relocify.nl](mailto:contact@relocify.nl), or by contacting your relocation coordinator.

13.9 The user that requests any of the actions listed in this article, will be required to prove their identity to Relocify.

13.10 We reserve the right to deny any requested action, if compliance would violate public policy, if a request is incomplete, or if the GDPR's requirements are not met.

13.11 You can exercise any of these rights, by emailing the Data Protection Officer at [contact@relocify.nl](mailto:contact@relocify.nl).

### 14. Complaints

14.1 If you feel that we processed your personal data in breach of our legal obligations, you have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR).

14.2 The supervisory authority in the Netherlands is:

Autoriteit Persoonsgegevens Postbus 93374

2509 AJ Den Haag Netherlands

Telephone: +31 070-8888 500

Website: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

### 15. Refusal to provide data

15.1 We cannot and will never force you to provide personal data. However, oftentimes personal data is required to properly handle your requests. Should you choose not to

provide us with the personal data required to process and handle your request, Relocify will not be able to help you with your request.

15.2 Should you refuse to provide personal data, Relocify has a contractual obligation to inform your employer.

#### 16. Changes to privacy policy

16.1 We review our privacy policy at least once a year.

16.2 We reserve the right to alter the privacy policy at any moment.

16.3 This privacy policy is publicly available on [www.relocify.nl](http://www.relocify.nl) as well as visible and accessible in all Relocify services.

16.4 Active users will be notified of any changes to the privacy policy, and the latest version is uploaded to the website.

#### 17. Business transfer

17.1 If Esflow Technologies B.V. engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of assets or a similar transaction or proceedings, personal data may be disclosed, shared or transferred to a third party in connection with the transaction.

17.2 We will require any third party that engages in any transaction or proceedings as stipulated in clause 19.1 to comply with this privacy policy, and any applicable laws and rules applicable to the privacy of our users.

17.3 We do not sell your personal data. However, we allow our users to opt out of any future sale in the event of a restructuring process as described under clause 17.1. If you would like to record your preference that Relocify not sell your data in the future, email [contact@relocify.nl](mailto:contact@relocify.nl), or contact your relocation coordinator.

#### 18. Data protection safeguards

18.1 We have multiple protocols in place to guarantee information security and compliance with applicable laws and rules. Examples include protocols on data breaches, accountability to the supervisory authority, and outsourcing.

#### 19. Applicable laws and rules

19.1 We process your personal data in compliance with the General Data Protection Regulation (2016), and the Dutch Implementation Act GDPR, as well as any other applicable laws.

19.2 Any legal right or obligation that is not mentioned in this Privacy Policy, yet included in the GDPR or any other applicable laws, exists alongside the clauses in this policy.