

## Privacy statement P1

This privacy statement derives from P1 Holding B.V. and its operating companies (in the following: 'P1') and is applicable to all its websites. In this privacy statement, we indicate what personal data we process for users of (the services on) our websites and how we handle this. In case you have any questions regarding, you can use of the contact information below.

### Article 1. Applicability

1. This privacy statement is applicable to the processing of all personal data which is provided through the websites to P1 in the context of parking-related matters.
2. P1 highly values confidentiality and therefore as well the privacy of data subjects who provide personal data to P1. It uses all personal data provided to it exclusively for the purposes described in this privacy statement and observes the applicable legislation and regulations regarding the protection of personal data. P1 is data controller in the sense of the European General Data Protection Regulation and establishes the purpose of and the means for the processing of personal data.

### Article 2. Personal data you transmit to us

1. To be able to make use of the services of P1, data subjects must provide the personal data which is required for the activities of P1.
2. If you register through one of our websites and/or contact us by way of a contact form, the following personal data may be processed: name, address, postal code, residence, e-mail address(es) and phone number(s).

This personal data is processed by P1 for the following purposes:

- the handling of your request for information;
- to contact you and to respond to the questions you ask;
- to inform you on relevant services and offers of P1 and companies associated with it by e-mail, SMS, or any other electronic means of communication if you have granted permission for this; data subjects can withdraw the permission granted by them at any moment by sending an e-mail to info@p1.nl;
- to send digital newsletters by e-mail; data subjects can withdraw the permission they have granted at any moment by sending an e-mail to info@p1.nl;
- to improve the website and the provision of services of P1;
- to conduct market surveys.

The processing of your personal data otherwise only takes place if you have granted P1 permission for this unequivocally.

### Article 3. Legal grounds for processing

1. The legal grounds for the purposes intended in the preceding lie in:
  - the permission granted by you (article 6 section 1sub a AVG/GDPR);
  - the pre-contractual measures taken upon your request and/or the implementation of the agreement concluded with you (article 6 section 1sub b AVG/GDPR);
  - compliance with legal obligations (article 6 section 1sub c AVG/GDPR);
  - the defending of legitimate interests of P1 or of a third party (article 6 section 1sub f AVG/GDPR).

### Article 4. Processing of special personal data and confidentiality

1. P1 exclusively processes special personal data of you to the extent you have granted permission for it explicitly or if this processing is in accordance with the applicable (privacy) legislation and/or regulations.
2. P1 handles the personal data provided to it with all due diligence. All our collaborators have signed a non-disclosure statement. They handle with due care the information you provide us with. Only authorised staff may in such case as may occur process your data. The administrators of P1 are the competent authorities regarding the attribution of authorisations.

### Article 5. Retention period

1. Personal data in a form which makes it possible to identify the client/data subject is retained no longer than is necessary for the realisation of the objectives it is collected for and subsequently processed.
2. P1 retains the data until completion of the process of providing services. This data which must be retained longer to comply with a legal retention obligation, is only removed after expiry of this longer term.
3. If the established or statutory retention period has expired, the personal data is removed from the files and destroyed within 3 (three) months.

### Article 6. Provision of personal data to third parties

1. P1 does not provide personal data of data subjects to third parties, barring if and to the extent:
  - a. this is indicated as such in this privacy statement;

- b. P1 has the right to do so pursuant to legislation and/or regulations and/or is constrained, or if it is requested to do so by a government institution or another regulatory agency;
  - c. this is necessary in the opinion of P1 to protect its rights and/or property;
  - d. an external party is deployed to conduct certain forms of processing for P1 and arrangements have been made with that third party regarding the use, the security, and the confidentiality of data ('processor agreement').
2. P1 does not register any more personal data than is necessary for the purposes described in the preceding.
  3. P1 applies procedures for the security of physical and digital personal data and has set access restrictions for the digital system. P1 makes every effort to take appropriate organisational and technical measures to secure the personal data of data subjects against illegitimate processing and/or loss. P1 is the object of periodic controls regarding quality standards, including:
    - annual EDP audit as a part of the annual account control;
    - periodic ISO 9001 and ISO 27001 audit by Lloyd's;
    - annual audit including penetration test, conducted by Logius in connection with DigiD connection.

#### **Article 7. Automatic decision-making and profiling**

1. P1 does not make use of automatic decision-making and/or profiling.

#### **Article 8. Website**

1. P1 is responsible for the exploitation of the website P1.nl.
2. The website of P1 is publicly accessible, with the exception of such portal(s) as may be present at the website.
3. Anyone can visit the public part of the website of P1. Thereby, data is processed as follows:

##### IP address

In the context of your visit to p1.nl information such as the IP address of the computer you use is registered. On the basis of the IP address, a user can potentially be identified. The IP addresses are not used for this purpose by P1, however. In the context of your visit, the parts, information, and pages of the website you have visited and/or viewed, as well as the material you forward or download from the website, are stored. This technical information is used for the management of the website and to optimise the website and the provision of services of P1. In addition, this data can be used for historical, statistical, or scientific purposes.

##### Cookies

On P1.nl use is made of cookies. A cookie is simple small file which is sent along with pages of this website and which is stored by your browser on the hard disk of your computer. They are used to collect information on your visit to this website and to facilitate the visit to this website. In addition, P1 uses cookies to investigate the effectivity of this website. You can only remove cookies yourself as they are stored on your computer. Consult for this purpose the manual of your browser. P1 will only make use of so-called First Party Cookies on its website. These are cookies which are placed by the website itself, and not by third parties. This regards functional cookies (which are necessary to let the website function properly) and analytical cookies (with these cookies we can keep statistics for our website).

##### Statistical analysis by Google Analytics

P1.nl makes use of Google Analytics, a web-analysis service which is proposed by Google Inc. ("Google"), to constantly optimise our on-line offer. Google thereby processes your IP address and information on how you use this website. This information is generated through cookies on your computer and subsequently forwarded to computers of Google in the United States where it is stored. Google uses this information to keep track of how you use the website, to prepare reports on the website activity for website operators such as P1 and to offer different services regarding website-activity and internet usage. Google may provide this information to third parties if Google is legally obliged to do so or to the extent these third parties process the information on behalf of Google. We exert no influence on this. Google will not combine your IP address with other data they have at their disposal. You can prevent the installation of cookies by choosing the appropriate settings on your internet browser. We point out to you, however, that in such case not all functions of the website will be fully available to you. By making use of this website, you grant permission for the processing of the data which Google has collected regarding you, in the manner and for the purpose as described in the preceding.

#### **Article 9. References and links**

The website of P1 may contain references and/or hyperlinks to one or several third-party websites. P1 is liable in no manner whatsoever for the way in which these third parties deal with privacy legislation. P1 advises clients/data subjects therefore to review the privacy policy on the websites of these third parties so they are aware of how these third parties handle their personal data.

**Article 10. Right of perusal, correction, addition, and shielding**

1. Data Subjects have the right to take cognisance of the data which is processed with regard to their person. To that purpose, you can ask P1 any time you wish through info@p1.nl or otherwise by letter to indicate what data P1 processes regarding you. The contact address is: Benoordenhoutseweg 46, 2596 BC The Hague. P1 takes care beforehand of the adequate identification of the applicant.
2. In addition, you are able as data subject at any time to ask P1 through the contact information indicated above to supplement your data, to correct it, or to remove it. Within four weeks after submittal of the request, the data subject is informed in writing of the substantiated decision concerning.
3. A request for the destruction or modification of the data is granted if:
  - the data is factually incorrect;
  - the data is incomplete for the purpose of the processing of data;
  - the data is not relevant for the matter;
  - the data violates a legal requirement.
4. A request for perusal or to obtain a copy can be refused in a substantiated manner. Possible grounds for refusal are the interests of the privacy of another person or the protection of the data subject.
5. Data subjects have the right to object against certain instances of processing of personal data. You have this right in the matter of all processing which is not based on (1) your permission, (2) the taking of pre-contractual measures on your request and/or the implementation of the agreement concluded with you, (3) compliance with legal obligations, or (4) the protection of vital interests of yourself or of others.
6. Data subjects have the possibility to appeal to the right of limitation. This means in short that P1 temporarily “freezes” the processing of the data.
7. Data subject has the right at all times to withdraw the permission he has at some point granted. In that case, we will immediately cease processing.
8. You have the right to receive the data you have provided P1 with in return in a commonly used file format. This right only applies to the personal data which we process of you pursuant to your permission or to an agreement concluded with you.

**Article 11. Monitoring agency**

1. You are at liberty at all times to file a complaint with the monitoring agency. The monitoring agency in the field of privacy in the Netherlands is ‘Autoriteit Persoonsgegevens’. You can find the contact information of Autoriteit Persoonsgegevens through the website [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

**Article 12. Questions, comments, and complaints**

In case you have questions, comments, or complaints about the processing of personal data by P1, you can contact P1 by e-mail at info@p1.nl or otherwise by sending a letter to: Benoordenhoutseweg 46, 2596 BC The Hague.

**Article 13. Modification privacy statement**

1. P1 has the right to modify this privacy statement at any time it wishes. In case of a relevant and specific modification of the privacy statement, data subjects are informed on the matter. The most recent privacy statement can also be viewed on the website P1.nl.
2. If provisions from this privacy statement are completely or partially void, annulable or in violation of the law, the other provisions of the privacy statement will remain in such case fully effective.