

### **Privacy Terms**

The General Data Protection Regulation, hereinafter GDPR, has been applicable since 25 May 2018. This privacy law applies to all companies and organizations that record the personal data of customers, staff or other persons from the EU.

This is the privacy statement of Growfield . In it, Growfield explains, among other things, the reason behind its collection and use of personal data, the kind of data these are and the rights you have in case Disem Institute processes your personal data.

Processing of personal data by Growfield

Growfield considers your privacy important. That is the reason it protects your data. Disem Institute treats this information confidentially and in accordance with the GDPR.

In this way, Growfield guarantees your privacy. This involves recording and providing your data. Which personal data does Disem Institute process?

Disem Institute processes personal data provided by means of the registration or contact form via its website as well as written registrations or correspondence conducted otherwise. This concerns the following data:

1. Name of the client / company / institution / legal entity
2. Given name(s), surname and function
3. Business correspondence address / postal code / house number / city / country
4. Business e-mail address / business phone number
5. Payment information

### **General privacy protection principles**

Growfield will protect your privacy as well as possible. It uses the general principles of privacy protection with regard to the following:

1. Personal data

Growfield collects the personal data it needs for its business operations.

2. Care

Growfield treats personal data carefully. It is only made available for appropriate business operations. The personal data is stored securely in accordance with the current digital security requirements. Disem Institute protects personal data according to a fixed protocol.

3. Transparency

Growfield is transparent regarding its processing of personal data. In other words, it explains the way it processes data and the reason for it in accordance with its privacy statement.

Growfield also explains the way it handles your personal data on its website.

Purposes of the processing

According to the GDPR, Growfield may only process personal data for specified purposes, such as the following:

1. Administrative organization and internal control
2. Financial administration, collection of debts and payment to creditors
3. Compliance with legal (fiscal) obligations with regard to the administration and retention obligation
4. Courses, other forms of education, training, presentations, seminars, workshops, advice, coaching, interventions, business analyses, strategic security provision, business cases, strategic step-by-step plans, decision-making support and so on
5. Statistical processing (with anonymized data)
6. Reply to customer contacts, newsletters and questions from customers
7. Dissemination of information on new products and services
8. Dispute resolution and auditing

### **Legal grounds**

The GDPR also prescribes that every processing should have a legal basis. The processing is only lawful if and insofar as at least one of the following conditions is met:

1. Your consent
2. Necessity of processing data in order to execute an agreement that Growfield has concluded with you or to take measures at your request before concluding the agreement
3. Compliance with legal obligations that rest on Growfield
4. Protection of the vital interests of yourself or others
5. Necessity of processing data in public interest or in the context of public authority—for example, the national criminal investigation department or the police
6. Representation of the interests of Growfield, someone else, or another organization, which concerns legitimate interests

### **Mandatory provision**

If Growfield asks for personal data, it will state whether this is necessary or mandatory. The (possible) consequences in case you do not provide the data will also be explained. The starting point is always that Growfield only collects the personal data it requires.

Security of personal data Growfield takes the appropriate measures to protect personal data against loss and unlawful processing.

Thanks to encryption technologies, encrypted communication and treatment of the data are confidential. People who have access to your data on behalf of Growfield must keep it secret.

Who can view the data?

The data can be viewed by employees of Growfield and third parties hired by Growfield who need access to the data in order to perform certain administrative, organizational or technical implementation tasks—for example, financial administration, planning of workshops, scheduling and adequate handling of correspondence.

What are your rights?

The GDPR gives you various rights when it comes to your personal data. You can exercise your rights by submitting a request to Growfield (refer to the bottom of this privacy statement).

Right to inspect You have the right to inspect the personal data that Growfield processes.

Right to correct and delete

If the personal data is incorrect, you have the right to have the data changed or deleted. This is also possible if the processing is no longer justified.

Right to object You can object to the processing of certain personal data. You have this right for all processing that is not based on the following:

1. Your consent
2. Execution of an agreement that Disem Institute has concluded with you or adoption of measures in advance (at your request) before the agreement is in place
3. Compliance with legal obligations or protection of the vital interests of yourself or others.