

# PRIVACY STATEMENT JANUARY 2021

TIN CUP PARTNERS (IN CONCEPT V.O.F.) | WITHUISWEG 7 | 8131 SM WIJHE | THE NETHERLANDS +31 (0)570 524760 | INFO@TINCUP.PARTNERS | TINCUP.PARTNERS

#### 1. PRIVACY STATEMENT

We look forward to your visit to our website. Below, we would like to inform you about the handling of your data in accordance with Article 13 of the General Data Protection Ordinance (AVG).

#### Responsible party

Responsible for the data collection and processing shown below is the service mentioned in the imprint.

#### Usage data

When you visit our website, so-called usage data is temporarily stored on our server for statistical purposes, in order to improve the quality of our website. This database consists of:

- · The page from which the file was requested,
- · the name of the file.
- the date and time of the request,
- the amount of data transferred,
- · the access status (file forwarded, file not found),
- · the description of the type of browser used,
- the IP address of the requesting computer, which is shortened so that it can no longer be traced back to a person.

The specified protocol data is only stored anonymously.

## 2. TRANSMISSION OF DATA TO THIRD PARTIES

# Data transfer to third parties

We do not pass on any data to third parties.

## Data transfer to third countries

We do not transfer data to third countries.

# 3. COOKIES

We use cookies on our website. Cookies are small text files that can be stored and read on your device. A distinction is made between session cookies, which are deleted when you close your browser, and permanent cookies, which also remain stored after a certain session. Cookies may contain information that allows the device used to be recognised. However, in part, cookies also contain only information about certain settings, which cannot be linked to a person.

# 4. TRACKING TOOLS

## **Google Analytics**

In order to customize the appearance of our website, we create pseudonymized user profiles using Google Analytics. Google Analytics uses cookies that can be stored and read on your device. In this way we can recognize returning visitors and count them as such. The data processing is done with the importance of finding out how often our website is accessed by different users.

The information generated by the cookie about your use of this website is generally transmitted to and stored by Google on servers in the USA. As we have activated IP anonymisation on this website, however, your IP address will first be truncated by Google within the member states of the European Union. Only in exceptional cases will the full IP address be transferred to a Google server in the USA (an appropriate level of data protection in accordance with Article 45(1) of the German Data Protection Act (AVG) is provided by Google's participation in the Privacy Shield) and shortened there first. Google will only use this information for the purpose of evaluating your use of the website and compiling reports on website activity.

You can object to the processing at any time. Please use one of the following options:

- You can prevent the storage of cookies by setting your browser software accordingly. Please note, however, that if you do this you may not be able to use the full functionality of this website.
- You can also prevent the data generated by the cookie and relating to your
  use of the website (including your IP address) from being transmitted to and
  processed by Google by downloading and installing the browser plug-in via
  the following link http://tools.google.com/dlpage/gaoptout?hl=en
- In addition, you can prevent Google Analytics from registering by placing an opt-out cookie, which will permanently prevent future registration of your data when you visit this website:
- · You can object to the processing of your data by Google Analytics.

#### **5. RETARGETING GOOGLE**

We do not use Google remarketing technologies

#### 6. SOCIAL MEDIA PLUG-INS

For data protection reasons, we do not integrate social media plug-ins directly into our website. When you access our website, no data is transferred to social networks such as Facebook, Twitter, XING or Google+. Profiling by third parties is therefore excluded

# 7. EXPLANATION OF THE SECURITY MEASURES

## Data security

In order to protect your data from unauthorised access as much as possible, we take technical and organisational measures. We use an encryption process on our pages. Your data is transferred from your computer to our server and vice versa via the Internet by means of a TLS encryption. You can see this by the closed key symbol in the status bar of your browser, which begins with https://.

# 8. USER RIGHTS

## Your rights as a user

AVG grants you, as a website user, certain rights when processing your personal data:

# 1. Right to information (art. 15 AVG):

You have the right to request confirmation of whether personal data about you are being processed; if this is the case, you have the right to information about these personal data and to the information set out in detail in Article 15 of the AVG.

# 2. Right of correction and deletion (art. 16 and 17 AVG):

You have the right to immediately request the correction of incorrect personal data about you and, if necessary, the completion of incomplete personal data. You also have the right to request that personal data about you be deleted immediately, provided that one of the reasons set out in detail in Article 17 of the GTC applies, e.g. when the data are no longer needed for the purposes intended

## 3. Right to limitation of processing (Art. 18 AVG):

You have the right to request the limitation of the processing if one of the conditions set out in art. 18 GCG applies, e.g. if you have objected to the processing for the duration of a possible inspection.

## 4. Right to data portability (Article 20 of the GCU):

In certain cases, which are set out in detail in Article 20 of the General Terms and Conditions, you have the right to receive the personal data relating to you in a structured, common and machine-readable format, or to request the transfer of this data to a third party.



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# 5. Right to object (Art. 21 AVG):

If data are collected pursuant to art. 6 (1) S. 1 lit. f (data processing to safe-guard legitimate interests), you have the right, for reasons arising from your particular situation, to object to the processing at any time. We will then no longer process the personal data, unless there are demonstrable compelling reasons for the processing, which outweigh the interests, rights and freedoms of the person concerned, or unless the processing serves to assert, exercise or defend legal claims.

## 6. Right to lodge a complaint with a regulatory body

According to art. 77 AVG, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of personal data concerning you contravenes the legal provisions on data protection. In particular, the right to lodge a complaint may be enforced with a supervisory authority in the Member State of your residence, your place of work or the place where the alleged infringement took place.

#### 9. DATA PROTECTION CONTACT PERSON

Our data protection contact is at your disposal for any information or suggestions regarding data protection:

Henk Rinzema, Withuisweg 7, 8131 SM Wijhe, The Netherlands www.tincup.partners, info@tincup.partners, Phone +31 (0)570 524760

# 10. FURTHER CONTENT OF THE PRIVACY STATEMENT

## 10.1. Contact

You can contact us at the address below:

IN CONCEPT VOF (TIN CUP Partners), Withuisweg 7, 8131 SM Wijhe, The Netherlands www.tincup.partners, info@tincup.partners, Phone +31 (0)570 524760

In order to be of service to you and to check and answer your question, we need your name, the subject, your e-mail address, your telephone number and a short description of your question. You may provide other information, but this is not mandatory. This data will only be processed within our group of companies, and only for as long as is necessary for the processing and to the extent that the processing is not subject to legal or technical retention obligations.

By sending an e-mail, you agree that the data you provide will be collected, stored and processed for the sole purpose of verifying and responding to your request within the company group. The legal basis for the processing is article 6 paragraph 1 S. 1 lit. a AVG. We will only use your data for the processing of your enquiry. Your consent can be revoked at any time, e.g. by e-mail to info@tincup.partners.

## 10.2. Facebook company page

We manage several Facebook pages on the basis of art. 6 paragraph 1 S. 1 lit. f AVG. At no time do we collect, store or process personal data of our users on this site. Furthermore, we do not carry out or initiate any other data processing. The data you enter on our Facebook page, such as comments, videos or photos, will never be used or processed by us for other purposes.

Facebook uses so-called web tracking methods on this page. Please be aware: It cannot be ruled out that Facebook may use your profile data to analyse your habits, personal relationships, preferences, etc. We have no influence whatsoever on the processing of your data by Facebook.