

# **GenKey Privacy Policy**

### Introduction

This is the privacy policy of GenKey Solutions and GenKey Netherlands BV, (The companies) established in Eindhoven and registered in the trade register of the Chamber of Commerce under number 17233846 respectively 32132038. The companies is part of the GenKey Group, which includes also GenKey Holding (IP), GenKey US Inc and GenKey Africa Ltd., The GenKey group is a biometric software development company, with clients throughout Africa and Central America.

GenKey attaches high importance to the protection of personal data of her clients and stakeholders. With this policy want to provide clear and transparent information about how we handle personal data. In doing so, we also want to give further consideration to personal data protection in accordance with the General Data Protection Regulation (GDPR)/ Algemene Verordening Gegevensbescherming (AVG), applicable from 25 May 2018.

Throughout our stakeholder interactions, we endeavor to act in a transparent and ethical way – while at all times respecting our clients' privacy. GenKey. In all cases, GenKey observes the requirements of the applicable laws and regulations relating the GDPR. This entails in all cases that:

- We process your personal data in accordance with the goal for which they have been provided, these goals and the types of personal data are described in this document;
- Processing your details is restricted to only those data that are necessary for the goals for which they are being processed;
- We will ask you to expressly consent that we collect and process such sensitive information.
- We have taken suitable technical and organizational measures in order to guarantee the security of your personal details;
- We do not disclose data to other parties, unless necessary for the execution of the goals for which they have been provided;
- Please note that we aware of your rights in respect of your personal data, and that we do respect these.

As GenKey we are responsible for processing your personal data. Should you have any question after reading this privacy policy, or if you wish to contact us, please call +31 40 7513911 or send a message to info@genkey.com

# 1. Definition personal data

Personal data are all data that can be traced back to a natural living person (i.e., not to an organization, association or company). Personal data gives factual information on a person, for example someone's name, birth date or gender.



## 2. The use of personal data

#### 2.1. We request personal data from you if you:

- Contact us via our website.
- ✓ Place an order with us
- ✓ Submit for our newsletter

#### 2.2. We collect the following data in our customer database:

- 🗸 name
- address
- country
- email address
- ✓ telephone number
- company name

#### 2.3. We (might) use this information to:

- Send you appropriate offers
- ✓ Send newsletters to you.

# 3. Retention period

GenKey keeps your personal data in file for as long as it is legally bound to keep them or for a maximum of 5 years whichever is shorter.

## 4. Information, amendments and objections

You can contact us via info@genkey.com for:

- More information about how we process personal data
- Questions arising from this privacy policy
- Inspection of your personal data that we process
- ✓ Objections to the use of your data by us, including the withdrawal of your consent.

# 5. Third parties

We will not provide your information to third parties, unless you have given your explicit consent or unless we are obliged to do so by law or a court ruling.

## 6. Rights concerning your data

You have the right to request the access, rectification or removal if your personal data, which we have received from you. Furthermore, you have the right to let us transmit the data you have provided to a third party. We may ask for valid identification before we cooperate with these kinds of requests.

# 7. Complaints

If you have a complaint about the processing of your personal data, we ask you to contact us directly. If we do not come together with you then we find this very annoying. You always have the right to file a complaint with the Dutch Data Protection Authority, this is the supervisory authority in the field of privacy protection.

# 8. Notification Authority Personal Data

If, in spite of the security measures taken by us, an unauthorized breach of our security takes place, and that breach leads to (the probability of) considerably serious adverse consequences for the protection of your personal data, the Dutch Data Protection Authority will be informed accordingly.

# 9. Notification to persons concerned

You will be informed of any breach of our security if the breach is likely to have adverse effects on your privacy.

# **10.** Changes privacy policy

It is possible that adjustments take place in this privacy policy in the future. We therefore recommend that you review our privacy policy regularly.

Eindhoven, 25-08-2018