

PRIVACY POLICY NuPunt B.V. with brand name Scalin

Contact

This privacy policy applies to the personal data that is collected or used by NuPunt B.V. with brand name Scalin hereinafter referred to as **NuPunt** or if specifically the website is meant, hereinafter referred to as **Scalin**

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Scope

This Privacy Statement applies to:

- (potential) distributors or other business partners of NuPunt
- visitors to the Scalin website
- End-Users of the Scalin website
- all other persons who contact NuPunt or of whom NuPunt processes personal data

Types of personal data

Personal data provided by you:

- contact details and other personal data needed to provide our products and services
- contact details and other personal data provided during for example events, seminars and information on business cards
- contact details and other personal data provided through contact forms or other web forms

Personal data obtained through our website:

- IP address
- your browsing behaviour on the website (including our web applications) such as information on your first visit, previous visit and current visit, the visited pages and the manner in which you navigate on the website

Personal data obtained from other sources:

- Personal data obtained from the Trade Register of the Chamber of Commerce
- Social Media
- Telephone number obtained from SMS gateway

Reasons NuPunt may use your personal data for

- Implementing an agreement related to our products and services.

Your contact details will be requested. NuPunt may also require other personal data to be able to execute the agreement, depending on the actual circumstances. The data will also be used to invoice the products and services NuPunt provided to you.

- Stay in touch with our customers.

Your contact details will be recorded in our systems and can be used to send you newsletters, updates, invitations to events and seminars and requested information.

- Authentication

NuPunt uses a secure, portable, environmentally friendly two-factor user authentication method: a hardware authentication token and password.

- Authorization

Standard access policy for personal data is that it may only be retrieved and updated by the user which entered the data.

- Carrying out and analysing customer satisfaction surveys

- Preparing user statistics

The user statistics of the website enables NuPunt to get an idea of the number of visitors, the duration of the visits, what sections of the website are visited and the click-behaviour. These are generic reports without any information about individual persons. NuPunt uses the collected information to improve the website.

Legal grounds for processing your personal data

- Based on an agreement or for the conclusion of an agreement
- A legal obligation
- Approval, although you will always have the right to withdraw any permission you have given NuPunt upon request (If withdrawal of certain personal data items can negatively affect the execution of the service, the client will be informed of these consequences by the partner of NuPunt who has the role of controller)
- In relation to a legitimate interest, NuPunt may, for example, use your contact details to invite you to an event.

Processors

NuPunt may hire service providers (processors) for the processing of your personal data which solely process your personal data based on our instructions. NuPunt will conclude a data processing agreement with these processors which meets the requirements laid down in the General Data Protection Regulation.

NuPunt, for example, works with service providers offering IaaS solutions (Infrastructure as a Service) or hosting services. NuPunt also hires IT service providers that provide support to the operation of

our systems. NuPunt also makes use of third-party services to send newsletters and commercial emails.

Third parties

NuPunt sometimes needs to share your personal data (contact information) with third parties like our distributors and resellers, depending on the actual circumstances. There are also legal obligations that require NuPunt to disclose personal data to third parties.

Your personal data will not be shared with third parties for commercial purposes beyond what is required for the normal operation of our services.

Personal Data can also be provided to third parties in case of a reorganisation or merger of our company or sale of (a part) thereof.

Transfer outside the European Economic Area

NuPunt needs to transfer your personal data to parties located outside of the European Economic Area (EEA) for sub processing. The processors located outside of the European Economic Area which provide NuPunt with IaaS or hosting services are located in the United States and have a registration for the EU-US Privacy Shield. You can find more information on:

<https://www.privacyshield.gov/welcome>

Rights regarding your personal data

You have the right to access, correct and remove any personal data which has been entered in the system. (If removal of certain personal data items can negatively affect the execution of the service, the client will be informed of these consequences by the partner of NuPunt who has the role of controller as defined in the GDPR). You can also object to the use of your personal data or request to limit their use. You can request a digital copy of the personal data which has been entered in the system. If you have any questions, please contact privacy@scalin.com or +31 6 1243 1211.

Complaints

If you have any complaints about how NuPunt handles your personal data, please contact NuPunt by sending an email to privacy@scalin.com. NuPunt would be happy to assist you. If this is not possible, you can always contact the Data Protection Authority in The Netherlands through <https://autoriteitpersoonsgegevens.nl/>

Changes

NuPunt may change this Privacy Policy. NuPunt invites you to regularly check the Privacy Policy to keep informed. NuPunt will also inform you of any substantial changes through this website.
