



## **PRIVACY POLICY HTM BICYCLE APP**

This Privacy Policy applies to all personal data that HTM Personenvervoer NV (hereinafter: "HTM") processes from its users of the HTM Bicycle App.

If you have registered via the HTM Fiets app and provide your personal data to HTM, you expressly consent to the processing of your personal data in accordance with this Privacy Policy.

We advise you to read the Privacy Policy and keep it for your own records.

### **1. Controller**

The person responsible for the processing of personal data is:

HTM Personenvervoer NV, PO Box 28503, 2502 KM The Hague

The data protection officer can be reached via [gegevensbescherming@htm.nl](mailto:gegevensbescherming@htm.nl)

### **2. What data does HTM process and for what purpose**

In the context of your registration / account, the following personal data are processed:

- a) First and last name
- b) Phone number
- c) Email address
- d) Bank and/or credit card number
- e) Photos sent by user

HTM processes the personal data referred to in sub 2.1 for the following purposes:

- a) your name, telephone number and e-mail address will be used for contact about your registration and any cancellation thereof, registration and unregistration for third parties, for the provision of the information you have requested or for handling the information obtained from you;
- b) your name and telephone number are used to send invitations and information about services and activities of HTM ;
- c) your name and bank account number are used to settle payments and purchased services;
- d) your personal data may also be used for historical and/or statistical purposes.
- e) any photos that you send to us to support what you have described in your ticket will be used by us to provide you with the best possible service in answering your question. We would like to point out that you do not send personal data as photo.

Your name and telephone number will be used up to one year after the end of the agreement to ask you about your experiences with the HTM Fiets app and to inform you about the developments of the app. You can adjust your details in your online account yourself if you are registered.

We only use your data to:

- To enable the use of the HTM Bicycle;
- Analyzing them internally to improve our services;
- Prepare anonymized statistical data.

### **3. Email Notification:**

HTM uses your name and e-mail address to send you its e-mail newsletter with information about activities, services and other interesting information about the HTM Bicycle. You can unsubscribe from these mailings at any time via the unsubscribe link at the bottom of the mailing.





HTM processes your personal data on the basis of the following principles in the GDPR:

- a) your consent
- b) performance of the agreement
- c) legitimate (business) interest

#### **4. Clicking Behavior**

Our website/app keeps general statistics about the use of our website/app, such as the most requested pages/tabs. The purpose of this is to see how many visitors view the website and app, how much time they spend on the website/app, which pages/tabs are visited most often, which information is downloaded the most, etc.

In this way we can optimize the design of the website and app so that we can further improve our services via the website/app, for example to provide our customers with more targeted information. For the sake of clarity: this concerns general data that are recorded. No personal data of visitors is collected. Your personal data will never be recorded via the internet without your explicit instruction or consent, for example when requesting information.

We process data that cannot be traced back to persons for, for example, market research, management information, use per location, developing products and services to improve services and carrying out marketing campaigns.

HTM will comply with applicable laws and regulations, including tax laws and regulations.

#### **5. Use of cookies**

The website keeps track of visitor data in order to measure the interest in the various parts of the site. This allows HTM to adapt the website to the interests and experiences of visitors and to make access to and use of the website easier. HTM uses temporary cookies for this; a small file that is stored on your computer's hard drive. The cookies do not contain any personal data. If you do not appreciate this, you can block the use of cookies in your web browser. All parts of our website will then still remain readable.

Google places a cookie for the Analytics component. Google may provide this information to third parties if Google is legally obliged to do so by the American or Dutch authorities, or insofar as third parties process the information on behalf of Google. If you want to block all data processing by Google Analytics, you can do this via your browser.

#### **6. Retention periods**

HTM processes and stores your personal data for the duration of your membership and for a maximum of one year after the termination of this membership. Subsequently, the personal data will be destroyed. We must keep tax data for 7 years in accordance with the Algemene Wet inzake Rijksbelastingen (General Law on State Taxes).

#### **7. Security Measures and Processors**

- 7.1 HTM has taken appropriate technical and organizational measures to protect your personal data. HTM adheres to the General Data Protection Regulation in all cases.
- 7.2 For the processing of the personal data, HTM uses the services of third parties, so-called processors. We have concluded a processing agreement with the processors.
- 7.3. HTM does not pass on your personal data to third parties. On the basis of legislation and regulations, HTM is obliged to cooperate and to provide personal data to investigative authorities, such as the police, tax authorities or FIOD, if they request this. In such cases, HTM carefully examines the competence of the relevant investigative body and will of course also comply with the requirements as set by the GDPR with this legal obligation.

#### **8. Right of inspection, removal and asking complaints**



- 8.1 You can submit a request to view, receive, change or delete your personal data via [deelfiets@htm.nl](mailto:deelfiets@htm.nl) . HTM will process your request and inform you about this within one month of receipt
- 8.2 If you wish to object to the (further) processing of your personal data as referred to in Article 2, you can also contact [deelfiets@htm.nl](mailto:deelfiets@htm.nl)
- 8.3 If you have complaints about the way in which HTM processes your personal data or handles your requests, you can contact [deelfiets@htm.nl](mailto:deelfiets@htm.nl)
- 8.4 Any other questions or comments about this Privacy Policy can be directed to [deelfiets@htm.nl](mailto:deelfiets@htm.nl)

The general terms and conditions of HTM Fiets apply.

If you are of the opinion that HTM has not acted correctly in response to your comment or complaint, you can leave a report with the Dutch Data Protection Authority at [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

## 9. Changes

This Privacy Policy is subject to change. The changes will be announced via the Website. We advise you to regularly review the Privacy Policy. If you find links on our website and app to other websites of other organizations and make use of them, HTM bears no responsibility for the way in which these parties handle your personal data.

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