

RTI BLOCKCHAIN PRIVACY STATEMENT

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GENERAL

RTI Blockchain B.V. (“**RTI Blockchain**”, “**we**” or “**us**”) places a high priority on protecting your data privacy. We have drafted this privacy statement to inform you of how we use your personal data. Personal data is defined as all information that would allow us to identify you either directly or indirectly. It is important to us that you understand how we will handle your personal data and that you are aware of your rights.

We may amend this privacy statement at any time. Notification of changes will be posted on the page containing this privacy statement our website <https://www.rtiblockchain.nl/> & [https://www.rtidashboard.eu /](https://www.rtidashboard.eu/) (“**Website**”), the RTI Dashboard iOS/Android application (“**App**”) and the RTI Dashboard web application (www.RTIDashboard.eu), (“**Web Application**”). This privacy statement was last updated on 30 September 2020.

OUR IDENTITY AND ROLE

We are the controller as defined in the General Data Protection Regulation (“**GDPR**”) with regard to the processing of your personal data as described in this privacy statement. Our place of establishment is in Amersfoort, the Netherlands. Our office address and correspondence address is RTI Blockchain, Valk Business Center Amersfoort, Ruimtevaart 24, 3824 MX Amersfoort, the Netherlands, but you can also contact us by e-mail to: info@rtiblockchain.nl

Users of the RTI Blockchain platform can upload documents and/or images, and these may contain personal data. When a user uploads a document and/or image to the RTI Blockchain platform, RTI Blockchain will process this personal data. RTI Blockchain will process this personal data as processor within the definition of the GDPR. This privacy statement does not apply to those processing activities.

WHAT PERSONAL DATA DO WE COLLECT, HOW DO WE COLLECT IT, AND WHY?

Contact information

When you contact us by means such as the contact form on the Website, we collect and process your e-mail address and/or any other necessary contact information that you provide to us. This contact information is used pursuant to our justified interest in responding to your query or request (article 6(1)(f), GDPR).

Registration for the platform

Using the App and Web Application, you can create an account on the RTI Blockchain platform for the company for which you work. RTI Blockchain receives your full name, e-mail address, telephone number and password as you enter it in the registration form. RTI Blockchain uses this information to confirm your registration and enable you to make use of the RTI Blockchain platform. This processing of personal data is necessary for the purposes of the performance of the agreement between the company for which you work and RTI Blockchain governing the use of the RTI Blockchain platform (article 6(1)(b), GDPR). If you do not provide this personal data, you will not be able to use the RTI Blockchain platform.

Other purposes

Alongside the objectives defined in this privacy statement, and only insofar as explicitly permitted by law or where RTI Blockchain is under an obligation to do so may we use your personal data for the other purposes defined in the GDPR and other relevant legislation. In that event, RTI Blockchain will comply with the principle of transparency and the other principles of lawful and legitimate processing of your personal data.

No automated decision-making

RTI Blockchain does not make any automated decisions about you. This refers to decisions made by computer programs or systems without intervention by a human.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

The processing as referred to in this privacy statement may, at the instruction and on the behalf of RTI Blockchain, be carried out (in part) by external service providers such as IT vendors.

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data no longer than necessary for the purposes for which we process it. The retention period may differ for each individual purpose.

The necessary contact information, including your e-mail address, that you provide to us when you contact us is retained until your query or request has been fully handled and closed.

If you have created an account on the RTI Blockchain platform, we retain your personal data for the purposes of your registration until you delete your account.

We may retain your personal data longer if dictated by a statutory retention obligation or in the interests of protecting our rights, including (but not limited to) for the event of a potential legal dispute.

SECURITY AND LOCATION OF PROCESSING

We have implemented appropriate technical and organizational measures to secure your personal data. Our systems and software are effectively secured in order to prevent unauthorized parties inside and outside our organization from gaining access to your personal data. Access to your personal data is limited to persons who require this access for the purposes of the performance of their work. If you have reason to believe that your personal data is not properly secured or have indications that your personal data may have been abused, please contact us immediately.

Your personal data is not processed outside the European Economic Area.

WHAT ARE YOUR RIGHTS?

You have the right to request us to allow you to review, correct or add to your personal data. Under certain circumstances you can also request us to delete your personal data, limit the processing of your personal data or to invoke your right to have the personal data we have concerning you transferred to another party (“data portability”).

Objection:

You can also object to:

- the processing of your personal data on the basis of a justified interest (article 6(1)(f), GDPR) due to reasons relating to your specific situation.
- the use of your personal data for direct marketing (for example, for our newsletter). If you object to the processing of your personal data for direct marketing purposes, we will stop using your personal data for that purpose.

A detailed description of your other rights is given below:

1	Right to review	You can request the opportunity to review the personal data and certain other information that we have on you.
2	Right to rectification	You have the right to have your personal data corrected if it is incorrect or incomplete.
3	Right to deletion	This is also referred to as “the right to be forgotten”. Under certain circumstances, you can request us to remove or delete your personal data.
4	Right to restriction of the processing	Under certain circumstances you have the right to block further use of your personal data. If there are restrictions on the processing, we may still save your personal data, but not continue to use it.
5	Right to data portability	Under certain circumstances you have the right to obtain and reuse your personal data in a structured, commonly accessible, and machine-readable form.

We point out that the rights listed above that you derive from the GDPR are not absolute. There may be circumstances that prevent us from fulfilling or fully fulfilling your request if one of the exceptional grounds under the GDPR or under article 41 of the Dutch GDPR Implementing Act (*Uitvoeringswet Algemene Verordening Gegevensbescherming*) applies. This may, for example, be a situation in which a restriction of the right in question is necessary in order to protect the rights and freedoms of others.

You may send us a request to exercise one of these rights by e-mail to info@rtiblockchain.nl or by post to RTI Blockchain, Valk Business Center Amersfoort, Ruimtevaart 24, 3824 MX Amersfoort, the Netherlands, to the attention of the Legal department. We may request additional proof of your identity in order to be sure that your request pertains to your own data. This is in the interests of the protection of your privacy.

You are at all times entitled to submit a complaint to a competent data protection authority if you believe that we are not processing your personal data in accordance with the GDPR. In the Netherlands, the regulatory authority for data protection is:

Autoriteit Persoonsgegevens

Website: <https://www.autoriteitpersoonsgegevens.nl>

Correspondence address: Postbus 93374, 2509 AJ The Hague, the Netherlands