

FD Mediagroep Privacy Statement

FD Mediagroep B.V., its operating companies and affiliates (hereinafter 'we') process personal data. We want to provide clear and transparent information about this to you.

This statement answers the most important questions about how FD Mediagroep processes personal data. We offer examples so as to be as clear and transparent as possible. If you have any questions about this Privacy Statement, you will also find how to contact us.

We use a number of specific terms in this Privacy Statement. The glossary below explains what we mean by some of these terms:

- **Personal data:** data that relate to you directly or indirectly, for instance your name and address, bank account number, or e-mail address. It may also be your computer's IP address or a bank transfer. Personal data covers all data that we can relate to you.
- **Processing:** anything that can be done with personal data, for instance collecting, as well as storing, using and deleting your data in and from our administration.
- **Relations:**
 - 1) All natural persons and organisations that use or have used paid and unpaid services that we provide, and
 - 2) all natural persons and organisations that have been in contact via one of our contact channels (telephone, e-mail, regular post, website, account manager) and shared information with us in the process.
- **Services:** All existing and future electronic and/or digital services we offer, such as our (mobile) websites, any web shops, all digital applications, digital news facilities (such as e-paper and RSS feeds) and archives, as well as all of the subscriptions we offer (such as the daily newspaper and other media that we publish), which are used by natural or legal persons or for which natural or legal persons have taken out a subscription.

Who we are?

We are FD Mediagroep, its operating companies and affiliates. These are:

- Het Financieele Dagblad B.V.
- Business Nieuws Holding B.V.
- Company Info B.V. /Webservices.nl B.V.*
- Energiea B.V.
- FD/IP Nederland B.V. (Pensioen Pro)
- ESB B.V. *

The aforementioned companies all have registered offices at (1097 BL) Amsterdam on Prins Bernardplein 173. Hereinafter, these companies are jointly referred to as 'FDMG'.

*With regard to the ESB (Economisch Statische Berichten) publication, the Koninklijke Vereniging voor de Staathuishoudkunde (KVS) bears partial responsibility for processing. Company Info B.V. and Webservices.nl B.V have their own joint privacy statement. Please refer to the companyinfo.nl website.

The data collected by the aforementioned companies are merged in a central FD Mediagroep data warehouse environment, which is centrally managed by Het Financieele Dagblad B.V. To realise this, data are exchanged between other operating companies and affiliates on the one hand, and Het Financieele Dagblad B.V. on the other.

Whose personal data do we process?

When you take out a subscription for one of our products or services, register, visit an event, register for an e-mail newsletter, participate in an promotion, use our digital services (website, apps, newsletters), contact us or otherwise avail yourself of our services, your personal data are registered and processed.

What personal data do we process?

Below is a list of data we process:

1. Data you supplied in order for us to provide the service you buy, such as name, address, e-mail address, telephone number, bank account number.
2. Data you supplied while creating and/or managing a digital user profile, such as date of birth, industry and position, newsletters you do or do not wish to receive, social media profile, topics and areas of interest about which you want to read more. You can manage these data in your account.
3. Derived data: we obtain data when you use our digital services (website, apps or newsletters), such as the device you use to visit our sites or apps, the pages you visit in our network, the articles you read, where you read them (at the municipal level), clicks on text links and ads, data about platform use, time, topics read, and clicks. These data are collected only after you have granted permission. We ask your permission when you visit (one of) our sites. (Please also refer to our 'Cookie Policy')
4. Data resulting from your contact history (incidental contact you have had through one of our contact channels (call centre, e-mail, regular post, website, account manager, etc)), such as conversation notes, customer queries, complaints, and participation in surveys. Such contact moments can be initiated by you or by us.

Why do we process these personal data?

We process personal data for the following purposes:

A. To provide our Services

We need your personal data to deliver the newspaper or send you an invoice, for instance. You can also reach us through multiple channels, such as telephone, post, e-mail, Twitter, LinkedIn, and Facebook. We process personal data to make this possible.

B. To comply with the law

This mainly involves personal data that are required to comply with our tax-related obligations.

C. To maintain the user accounts

You need a user account to read articles on our websites. When you create an account with our company, you can use it for Het Financieele Dagblad, BNR Nieuwsradio, Pensioen Pro, ESB, and Energiea Energienieuws.

D. To improve and innovate our services

We also use personal data to improve our products and services. We collect the click behaviour on the websites, for instance, to analyse what articles are read the most or the least. We collect preferences/areas of interest and combine this with articles read to show you relevant personalised articles or newsletters.

E. To conduct marketing activities

We like keeping you informed, for instance by means of e-mails, newsletters, promotions on our website, or apps customised for you. Or with our personalised ads on third party apps and websites, as well as social media.

We also sell available ad space to advertisers. Personalised ads from these advertisers are also displayed on our sites.

We also use 'custom audiences' via social media platforms, such as Facebook, Twitter, and LinkedIn. (Personalised) ads can be shown on these platforms, too. We do not divulge personal data to external parties for these purposes unless you have granted us permission.

If you do not want ads to be shown via these platforms, you can let us know via the contact details below. You can also unregister for these ads on the aforementioned platforms. You can find out how on the following pages:

- [Facebook](#)
- [LinkedIn](#)
- [Twitter](#)

Please note: you may still see our ads after unregistering because you are part of a general audience to which we tailor our ads.

Special data

We process 2 types of special personal data: gender and ethnicity (photo). We process gender so we can address you as 'Mr', 'Mrs' or 'Ms'. We process photographs to set the mood for our content on websites or in e-mails. Such processing operations are always voluntary and are not used for other purposes.

How do we ensure your personal data are protected during processing?

Your personal data are stored with all due care for no longer than is strictly necessary for the purpose for which they are processed, and for as long as the law requires us to retain your data. The retention term may vary.

The collected data are stored in several source systems. These source data are usually located in our Amsterdam offices but are sometimes stored locally at one of our service providers (e.g. Selligent or Amazon Web Services).

Our policy is based on data storage on the European mainland.

Much of the data from source systems is consolidated in a single data warehouse environment, which is hosted by Amazon Web Services. Here, too, data is always physically stored on the European mainland. Moreover, Amazon complies with all the most common and robust

security standards (cf. <https://aws.amazon.com/compliance/eu-data-protection/>)

Within the data warehouse, we implement the following measures and privacy safeguards in addition to Amazon's standards:

1. No more than a very limited, minimum required number of employees have access to the data. Access is granted only if required for the position. Moreover, data access is authorised only for the part of the data required for any single position.
2. Employees who have access to the personal data have all signed a strict confidentiality agreement.
3. All information that can be traced back to persons directly or indirectly (e.g. name, address details, e-mail address, telephone number) is encrypted on a permanent basis so that it can no longer be traced back to specific persons.
4. We will not use the data in any way aiming to lend, lease, sell or otherwise divulge the data.

Third party recipients

Sometimes we are required by law to provide personal data to external parties, such as the Tax Office. Otherwise we will only supply your data to third parties with your permission.

We also rely on third parties who process personal data on our behalf, for instance a printing company that handles a customer mailing for us and prints your name and address details on the envelopes. We are only allowed to call on third parties if the purpose coincides with the purpose for which we have processed your personal data. Furthermore, such third parties can only receive our assignment if they can demonstrate that they have implemented suitable security measures and guarantee confidentiality.

External countries

Countries outside the European Union (EU) do not always offer the same protection for your data as EU member states. In some cases, we rely on third parties (Google Analytics and Optimizely) that may require us to transmit your information to countries outside Europe, for instance because (the servers of) the companies which support us or on which we rely to execute the Services are located there. We are authorised to transmit your personal data to non-EU countries to execute the Services. We only transmit personal data if suitable safeguards are in place based on the 'Privacy Shield' (United States).

What are my rights relating to processing of my personal data?

You have the following rights:

- **Information and consultation:** We are happy to tell you which of your personal data we are storing and for what purposes.
- **Rectification:** Please let us know if you want to have your personal data corrected or supplemented because they are incorrect and/or incomplete. We will change them accordingly.
- **Deletion:** You can also submit a request for us to delete your data. We cannot delete data when the law requires us to retain the personal data in question. We may also have to be able to process the data for other purposes (administrative).



- **Limitation:** You can impose limits on processing of your data if you feel that your data are processed unlawfully or incorrectly.
- **Objection:** You can submit an objection against processing of your data. If this relates to processing for direct marketing purposes, we will terminate the processing as quickly as possible.
If you no longer wish to receive direct mail, you can:
 - Unsubscribe via any marketing mail
 - Change your account settings
- **Transferability:** If you want us to transmit your data to a third party, please contact us at privacy@fdmediagroep.nl.

In order to exert your aforementioned rights, please contact us at privacy@fdmediagroep.nl.

Who can I contact if I have questions or a complaint?

If you have questions or complaints about processing of your personal data, please contact us at privacy@fdmediagroep.nl. After 25 May 2018, you can also lodge a complaint at the Autoriteit Persoonsgegevens (Dutch Data Protection Authority at www.autoriteitpersoonsgegevens.nl).

Can we change this document?

Yes, our Privacy Statement may be reviewed from time to time. If there are new data processing methods, we will amend the Privacy Statement accordingly. If these changes are relevant to you, we will notify you or alert you to the changes. The most current version of our Privacy Statement can be found at www.fdmg.nl.

[23 May 2018]