Privacy Policy Leviy

Version 3.2
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1. *Introduction*

Leviy takes your privacy very seriously and will process and use information about you (the data subject) in a secure manner. In this Privacy Policy, we explain which data we process and for what purpose. You can also read about your rights regarding the processing of your personal data. We recommend that you read this Privacy Policy carefully.

a. Who is Leviy

Leviy is Leviy B.V., a private limited company under Dutch law, with its registered office at Databankweg 12H, (3821 AL) Amersfoort, registered in the Dutch Trade Register under number 66628547.

b. How are you involved?

We may process your personal data for various purposes, depending on how you interact with Leviy. Therefore, we distinguish the following ways of involvement:

i. As a visitor to our website
ii. As a user of our digital solution (via website or app)
iii. As a customer of Leviy (potential, former, or current)
iv. As a job applicant

Your involvement may apply to multiple of the above situations. Please determine this yourself. For each situation, we provide relevant information regarding your privacy below. Finally, please also read section '6 General'.

c. Who is responsible for your personal data?

The party that has control over the personal data is called the Data Controller. Leviy provides a digital solution to its customers. The customers have control over the information in the digital solution and are therefore the Data Controllers. In the situation where you are a user of our digital solution, we are referred to as the Processor, and your organisation is the Data Controller. In other situations, we are the Data Controller. For questions regarding your personal data, it is best to contact the Data Controller.

Involved as: Data Controller and/or Processor

a. Visitor to the Leviy website: Data Controller: Leviy
b. User of Leviy's digital solution (website or app): Data Controller: your organisation + Processor: Leviy
c. Customer of Leviy (potential, former, or current): Data Controller: Leviy
d. Job applicant: Data Controller: Leviy

2. *Involved as a visitor to our website*

In this situation, Leviy is the Data Controller.
Our website, leviy.com, has two functions. First, it provides information about our company and the services we offer. Second, authorised users can log into a secure area through the website. This area is also directly accessible via dashboard.leviy.com. If you have access to this area, the situation as a user of our digital solution also applies to you (see section 3).

d. ***Which personal data do we process?***
   i. Information about your activities on our website
   ii. IP address
   iii. Location data
   iv. Why do we process this personal data?

Leviy analyses your behaviour on the website to improve our website and tailor our product and service offerings to your preferences. The legal basis for this is a legitimate interest, specifically a commercial interest.

e. ***How long does Leviy retain my personal data?***
   Leviy retains your personal data for no longer than is strictly necessary to achieve the purposes for which your data is collected.

3. *Involved as a user of our digital solution*

In this situation, your organisation is the Data Controller.
As a user of our digital solution, the situation as a visitor to our website also applies to you. Therefore, if you haven't already done so, please also read section 2.
Only individuals authorised by an organisation, who have a licence or other agreement with Leviy, can access our website, dashboard.leviy.com, or the Leviy app. If you have access, Leviy will process certain personal data about you on behalf of your organisation. If you gained access through a Leviy license holder and are not employed by this organisation, we refer to this licence holder of Leviy as 'your organisation'.

a. ***Which personal data do we process?***
   The personal data that is processed depends on the services your organisation purchases from Leviy.
b. ***Why does your organisation process personal data?***
   Depending on the services your organisation purchases from Leviy, your personal data may be processed for the following purposes, for example:
   i. Granting and managing access to rights and roles within the digital solution.
   ii. As a basis for the work your organisation performs for its clients.
   iii. For the correct execution of your organisation's personnel and payroll administration.
   iv. For evaluating (your) results and performance.
   v. For more information about the purposes of your organisation and the applicable legal grounds, you can contact your organisation.
c. ***How long does Leviy retain my personal data?***
   The retention period(s) for the processing we carry out on behalf of your organisation have been agreed upon with your organisation. For more information, you can contact your organisation.

4. *Involved as a customer of Leviy*

In this situation, Leviy is the Data Controller. As a customer of Leviy, we process personal data for various purposes. The purposes, involved personal data, and legal grounds are listed below.

a. Purpose: Financial administration
b. Data: Company name, billing address, bank details (bank name/IBAN/BIC), outstanding balance
c. Legal basis: Legal obligation
d. Retention period: 7 years
e. Purpose: Providing the service itself

    i. Data: Name and address details, email address, case data, financial data, data necessary to provide the service, data generated during the service
    Legal basis: Performance of the contract
    Retention period: As long as necessary for this purpose
    Purpose: Handling complaints

    ii. Data: Name and address details, email address, case data, financial data, data necessary to provide the service, data generated during the service
    Legal basis: Performance of the contract
    Retention period: As long as necessary for this purpose
    Purpose: Invoicing

    iii. Data: Name and address details, email address, case data, financial data, data necessary to provide the service, data generated during the service
    Legal basis: Performance of the contract
    Retention period: 7 years
    Purpose: CRM

    iv. Data: Name, email address, location, order history, social media data, phone number, appointments, profile picture
    Legal basis: Legitimate interest
    Interest: Commercial interest
    Retention period: As long as necessary for this purpose
    Purpose: Newsletter (e.g., for marketing purposes)

    v. Data: Name and address details, email address, phone number
    Legal basis: Legitimate interest
    Interest: Commercial interest
    Retention period: As long as necessary for this purpose
    Purpose: Technical newsletter (to inform you about changes to our services and products)

    vi. Data: Name and address details, email address, phone number
    Legal basis: Performance of the contract
    Retention period: As long as necessary for this purpose
    Purpose: Verification and support (to contact you if needed for the execution of our services)

    vii. Data: Name and address details, email address, phone number
    Legal basis: Consent
    Retention period: As long as necessary for this purpose

5. *Involved as a job applicant at Leviy*

This applies when you send us a cover letter, possibly with a CV. In this situation, Leviy is the Data Controller. Our goal is to compare various candidates and make a selection based on your personal data. We share your data with various employees at Leviy.

a. Which personal data do we process?
   Name, address, city
   Date of birth
   Email address and phone number
   Social media data – CV
   The legal basis for this is a legitimate interest, specifically recruitment.
b. How long does Leviy retain my personal data?
   Leviy retains the personal data for up to 4 weeks after the conclusion of the recruitment process.

6. *General information*

a. With whom does Leviy share personal data?
   If you are a user of our digital solution, Leviy, as the Processor, shares your personal data with your organisation. The organisation may then share your personal data with third parties through Leviy. For more information, you can contact your organisation. In consultation with your organisation, we enter into a data processing or sub-processor agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality for your data. Leviy may engage external consultants. These consultants are bound by the same confidentiality obligations as our own employees.
b. What happens with transfers to third countries or international organisations?
   For technical and operational reasons, it may be necessary for your personal data to be transferred to a company affiliated with Leviy outside the European Economic Area. Since privacy protection rules there may not provide the same level of protection as within the European Economic Area, Leviy will use the Privacy Shield or EU Standard Contractual Clauses to protect your privacy as much as possible.
c. What are cookies and how does Leviy use them?
   A cookie is a small text file stored on your computer, tablet, or smartphone when you first visit this website. The cookies used by Leviy are necessary for the technical operation of the website and for your convenience. They ensure that the website functions properly, for example, by remembering your preference settings. It also allows us to optimise our website. Leviy only uses technical, functional, and analytical cookies that do not infringe on your privacy. You can opt out of cookies by setting your internet browser not to store cookies. You can also delete any previously stored information through your browser settings.
d. What are my rights?
   Under the European General Data Protection Regulation (GDPR), you have certain rights regarding your data and its processing. To exercise your rights regarding personal data processed on behalf of your organisation, you should contact your organisation to determine the conditions for such a request. To exercise your rights regarding personal data for which we are the Data Controller, you can send an email to info@leviy.com. These rights include the following:
      i. Right of access: You can always access your personal data and, if necessary, make changes to your account. If you wish to view the personal data Leviy has recorded about you, you can submit a request for access to your organisation if Leviy is the Processor, or to Leviy if we are the Data Controller.

ii. Right to rectification: If, following an access request, you wish to rectify your personal data but cannot do so yourself in your account, you can submit a request to your organisation or to Leviy. You can ask your organisation or Leviy to modify, correct, complete, delete, or block your data.

iii. Right to restriction of processing: You also have the right, under certain conditions, to request your organisation or Leviy to restrict the processing of your personal data.

iv. Right to object: If a certain processing is based on Leviy's or a third party's legitimate interest, you have the right to object to that processing.

v. Right to data portability: You have the right to obtain your personal data from your organisation or Leviy. Leviy will provide this data in a structured and commonly used format, which can be easily opened in other widely used digital systems.

vi. Right to withdraw consent: In all cases where your consent is the legal basis for a specific data processing, you have the right to withdraw that consent. This will not affect the lawfulness of processing based on consent before its withdrawal, but it means that we will no longer be able to process that data. As a result, Leviy may no longer be able to provide certain services to you.

vii. Leviy's response
You can send a request to info@leviy.com. Leviy will respond to your request as soon as possible and, in any case, within one (1) month of receiving the request. If Leviy denies your request, we will explain the reasons for the refusal in our response.

viii. Can this Privacy Policy be modified?
This Privacy Policy is subject to changes. Therefore, we recommend that you review the Privacy Policy regularly for any updates.
Where can I go for complaints and questions?
If you have questions about this Privacy Policy and how Leviy uses your data, you can send an email to info@leviy.com. If you have a complaint about how Leviy processes your data, you can also email this address. Additionally, you can always contact the relevant national supervisory authority for privacy protection. In the Netherlands, this is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).