

Processing Personal Data

Your privacy matters to us. This statement forms the basis on which personal data that we collect from you or that you provide us with is processed by RC-BKA BV (hereafter "RC-BKA", "we", "us" or "our"). Please read this document thoroughly to know how RC-BKA handles your personal data.

The term 'Personal Data' refers to information about you personally (name, license plate, phone number, email, etc.). Please keep in mind that both changes in the law as well as the ever changing state of current technology mean that our privacy statement is subject to change. Anytime a change in our Privacy Statement occurs, we will update this document without informing you. The most recent version of our Privacy Statement applies. We therefore advise you to check this statement regularly.

We process your personal data with the utmost care and in accordance with the GDPR (General Data Protection Regulation). The fundamental idea when processing personal data is that the data that is processed is sufficient, not excessive and relevant.

Who is responsible for the data?

RC-BKA, its statutory seat in Amersfoort, is the Controller for the Processing of your data. The statement pertains to the gathering and more in general the processing of personal data by RC-BKA, with the main goals of processing payments and providing the mobility services of RC-BKA.

Retention

We don't retain the personal data we collect longer than is necessary for the purposes for which it was collected, with a maximum of 18 months, unless otherwise stated in this Privacy Statement. After the retention period mentioned here, all your personal data will be removed, unless the data has to be retained longer due to legal obligations. Removal implies anonymizing, destroying or process in such a way that it's no longer possible to identify you.

What data is collected and for what purpose?

You can provide us with information by filling in forms on our website(s), by using our website or our app, by contacting us through telephone or email, by using third-party services or otherwise. This includes information that you provide when registering on our websites, when using third-party mobility services, when sending us a request, when contacting our customer service, when concluding a contract for delivery of services, when participating in promotions or questionnaires and when reporting a problem with our website. The personal data you provide, which is necessary to provide our services and/or provide you with an answer can include your name, address, email address, phone number, trip information (location, date, supplier, customer number), and bank data. We will not use your personal data for other purposes than mentioned in this Privacy Statement. We will never sell your personal data.

More specifically, to comply with your request to supply, amend or update one or more (mobility)services, we need to collect your data in the following cases.

Providing an OV-chipcard

To be able to provide you with an OV-chipcard, we share the necessary personal data with Trans Link Systems B.V. (hereafter 'TLS'), our card producer. We take measures to prevent a personal data breach from happening. In this context we only exchange data with TLS that is necessary for them to perform their services. In some cases this is just your card number, on other cases your name and contact data is passed on. We receive travel information and trip data from TLS. Consider location, date, supplier and price of a transaction.

TLS is considered an independent controller in this process. By using the services offered by TLS through RC-BKA you agree to the terms and conditions and the privacy statement of this/these party/parties. We only collaborate with parties that have been thoroughly vetted and that adhere to strict privacy demands. Nevertheless the party in questions is the controller after receipt of your data. We are not responsible for the content, privacy and security practices and the policy of third parties with which we exchange data. We advise you to study the privacy and security practices of TLS before you provide them your data. You can find these on the website of TLS, if necessary you can ask TLS to provide these documents to you.

The basis for the exchange of data with TLS is the performance of a contract. We process your data until 18 months after termination of your user account. The retention period of TLS can be found in their privacy policy.

Customer contact and (electronic) messages

To be able to answer your questions or help you with something it is sometimes necessary for us to use your data. This concerns for example your contact data, your trip data or your device data. To be able to process complaints or requests it can be necessary for us to use your bank data.

The basis for processing this data is the performance of a contract. We retain your customer contact data and electronic messages to a maximum of 18 months after the termination of your user account.

Reports

To create reports and to perform statistical research RC-BKA receives your travel data from TLS. This data is then passed on to Mobility Services B.V.

The basis for processing this data is the performance of a contract and looking after the legitimate interests of RC-BKA. We retain reports until 18 months after termination of the contract.

Improving RC-BKA

RC-BKA continuously works to improve its services and your user experience. To improve our services your data is analyzed. For example, your travel data, website and app usage, and system and account data is analyzed.

The basis for processing this data is looking out for the legitimate interests of RC-BKA. We retain your data up to 18 months after termination of your user account.

Keeping RC-BKA secure

In the interest of fraud prevention and detection we can use your contact and travel data. We can also use your account and system data, including your IP addresses for security purposes.

The basis for the processing is looking out for the legitimate interests of RC-BKA. We retain your data up to 18 months after the data was created. In case of fraud or unauthorized access we retain the data up to 10 years after the time of the incident.

To whom do we provide personal data?

We can provide you with the personal data that applies to you. Next to Mobility Services B.V. we also provide your data to the following categories of recipients:

- We are required to provide your personal data should we be obliged by law for any reason.
- We can provide your personal data to Processors as known under the GDPR. These are suppliers that perform activities commissioned by us. When we collaborate with partners we – as Controllers – make sure that personal data is processed properly and accurately in accordance with the GDPR by our suppliers. This involves the following types of Processors:
 - Hosting parties
 - Analytic software
 - Security software for keeping our services secure
 - Filesharing
 - Research software and services

Storage data

We store your personal data within the European Economic Space.

Links to third-party sites

Our service may contain links to third-party sites, apps and advertisements, that may collect information about you. We do not control such sites or their activities. All data, including personal data you provide to these third parties, are provided directly to these parties and are subject to the privacy statement of these third parties. We are not responsible for the content, privacy- and security practices and the policy of third parties to which these links refer or redirect. We advise you to study the privacy and security practices and the policy of the third party before you provide them with data. You can find these on the third party's website, if necessary you can ask the third party to provide you with these documents.

Security

We've taken physical, technical and organizational measures to protect your personal data. We do everything we can to ensure the complete reliability, accuracy and integrity of your personal data in our databases and to protect the privacy and

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security of our applications and databases. At least the following measures are in place:

- We have set up physical and technical measures and management procedures that were designed to prevent unauthorized access, and/or loss or abuse of personal data as much as possible;
- Sensitive information or personal data, like account passwords and other payment related identifiable information is encrypted before being transmitted;
- Sensitive information is encrypted and/or hashed (this includes your password) when retained; we limit the internal access to personal data to employees who need this information to be able to perform their job;
- Our employees are bound by a confidentiality clause;
- Our information management systems are designed in such a way that employees who are not authorized to access certain information or personal data, in principle don't have access to that information;
- Our servers are located in a secured environment in datacenters. You only gain access to our servers front-end and only by logging in with a user name and password. You are personally responsible for the safe keeping of your login data;
- The personal data is regularly backed up.

Seven rights

The personal data that we use of course is and remains your property. Therefore you have the right to view, amend, delete, limit or transfer the data we have of you to someone else. In some cases this is possible through the web portal of the service provider or via the request form on their service page. You can apply for the following from us:

- A request to **data portability** based on your right to transfer your personal data to another party;
- A request to **erasure** with which you can enforce your right to be forgotten;
- A request to **access** based on your right to view the personal data we have of you;
- A request to **rectify** and complete which gives you the right to amend the personal data we work with;
- A request to **restriction of processing** with which you can utilize your right to have less of your personal data processed; and
- A request to **objection** with which you can enforce your right to object to the data processing.

We will ask you to proof your identity as soon as we've received a written request to make sure we don't report your personal data to others. Next we will offer you an overview of all the personal data that we retain of you and/or correct, amend, export or remove personal data. Your request will be handled within 30 days. We would like to inform you that your request may have consequences for the use of our services.

Questions or complaints?

Everyone has the right to ask a question or file a complaint with us about the processing of their personal data by contacting us in any of the ways mentioned hereafter. If you want to correct your data, if you have a question or in case you object to us processing your data, you can send us a message. We, RC-BKA, are located in Amersfoort and hold office at Utrechtseweg 9, 3811 NA. Our service desk is available via phone: 088 9343428.

In case of any complaints about the processing of personal data or the handling of complaints pertaining the processing of personal data by RC-BKA you can contact the Autoriteit Bescherming Persoonsgegevens directly, through phone number: (088) 18 52 50, or via: <https://autoriteitpersoonsgegevens.nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>.