

1 Definitions

Legal Basis

The foundation on which data is processed. This may include consent, vital interests, legal obligation, performance of a contract, public interest, or legitimate interest.

Legitimate Interest

A balancing of the interests of BIT and the interests of the individuals whose personal data is being processed.

2 Principle

Your privacy is respected by BIT. The principles of privacy-by-design and privacy-by-default are adhered to. Unless necessary for the provision of services to you, no attempt is made to identify personal data to a specific natural person. Except in cases of legal obligation or where sharing is essential for service delivery, BIT will never sell, rent, or otherwise share your personal data with third parties. BIT does not transfer your data to processors located outside the European Union. No automated decision-making is performed based on your data, nor is profiling of natural persons conducted.

3 Rights

You are the owner of your personal data. This means you also have rights concerning this data, even when it is processed by BIT. The rights you may exercise include:

- **Right of access:** You may request access to the personal data processed by BIT about you. Most of your personal data can be viewed by you via BIT's portal. You will need an account for this portal to access your data.
- **Right to rectification:** You may request correction of personal data processed by BIT if it is inaccurate.
- **Right to data portability:** You may request the personal data processed by BIT in a machine-readable format, enabling you to transfer services provided by BIT to another provider.
- **Right to erasure:** You may request the deletion of personal data processed by BIT if you withdraw your consent and no other legal basis for processing remains.
- **Right to object:** You may object to the processing of your personal data by BIT. Based on your objection and BIT's interests, it will be assessed whether processing can be ceased or modified.
- **Right to lodge a complaint:** You may file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, AP) if you believe BIT is not handling your personal data appropriately. Complaints can be submitted via the AP's website: autoriteitpersoonsgegevens.nl.

4 Contact Details

If you wish to exercise one or more of the rights described in this statement, please contact BIT, the data controller:

BIT B.V.

Subject: processing personal data

PO Box 536

6710 BM Ede

The Netherlands

T: +31 318 648 688

E: info@bit.nl

If you have questions about the processing of your data, this privacy statement, or wish to report a data breach, please contact the Data Protection Officer (DPO) of BIT. This officer is registered with the Dutch Data Protection Authority under AP FG number FG002803. Contact details are:

BIT B.V.

Attn.: Data Protection Officer

PO Box 536

6710 BM Ede

The Netherlands

T: +31 318 648 688

E: dpo@bit.nl

5 Security

BIT has implemented the following general security measures to ensure the safety and availability of your data:

- **Flooding and water damage:** Data is stored in data centers located at least 6 meters above sea level (NAP), equipped with water detection systems and water pumps connected to emergency power supplies.
- **Lightning strikes:** Lightning protection systems installed and certified according to NEN standard 1014, class LP4.
- **Fire:** Fire detection systems (checked monthly, fully tested annually), automatic alerts to the RAC, cooperation with fire departments, gas extinguishing systems, emergency response officers (BHV), certified fire alarm managers, quarterly evacuation drills.
- **Power outage:** N+1 or N generators per location, UPS redundancy, monthly generator testing, UPS support for offices.
- **Burglary:** Security zoning, electric fencing, intrusion detection and alarm systems, armed monitoring, video surveillance, dual independent security services, VEB Class 4* certified.
- **Climate control:** Separate BMS for each location, N+1 redundancy in cooling and humidification.
- **Cabling (interference):** Structured cable ducts, separate ducts for power and data, especially for heavy connections.
- **Network redundancy:** Distributed equipment between locations, dynamic routing, geographical separation of critical links.
- **Backup:** Redundant storage infrastructure, separate hardware for backup, encryption in transit and at rest.
- **Load balancing:** Standard and optional load balancing with geographic separation.
- **Logical access:** Enforced password policy, IP-based access control, RBAC, VPN with MFA, firewalls, centralized logging, intrusion detection.
- **Organizational:** ISO 27001 and NEN 7510 certifications, confidentiality agreements, VOG for staff, dedicated security and privacy officers, awareness training, encryption policy.

You can find a more detailed overview of the specific security measures taken for each type of data processing activity below.

6 Processing Register

The processing register specifies the processing activities for which BIT acts as the data controller. It includes:

- The purpose of the processing.
- The legal basis on which the processing is conducted.
- In the case of consent as the legal basis, the consequences of withdrawal of that consent.
- The type (category) of personal data being processed.
- The data subjects (owners) of that data.
- The recipients of the data and/or parties who may access it.
- The data retention period.
- The methods used to secure the data.

BIT processes more personal data than what is included in this register. However, for those processing activities, BIT acts solely as the data processor and not the data controller. For any questions regarding such processing activities, please contact the respective data controller.