

# Privacy statement Signum Interfocus

This privacy statement has been drawn up by Signum Interfocus B.V. (Chamber of Commerce number 64098184). Signum Interfocus is located at the address Stationsweg 46 in Oosterbeek.

Signum Interfocus can be reached via:

- [Our website](#)
- [Our e-mail address](#)
- Our postal address: Stationsweg 46, 6861 EJ Oosterbeek
- Our telephone number: +31(0)85-4890206

## Background and contents of this privacy statement

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Signum Interfocus is aware that appropriate processing of personal data is of great importance. Processing is about everything that can be done with personal data, from saving to destroying. The General Data Protection Regulation (GDPR) lists 'collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction' as examples of processing data. In this privacy statement you can read which personal data Signum Interfocus processes and with which purpose we process data. The way in which Signum Interfocus operates is in accordance with the GDPR.

This privacy statement is structured as follows:

1. Controller
2. Personal data that we process;
3. Special and / or sensitive personal data that we process;
4. Purpose of data processing;
5. How long we store your personal data;
6. How we protect your personal data;
7. Sharing your personal data with third parties;
8. Cookies, or similar techniques, that we use
9. View, modify or delete your personal data
10. Submitting a complaint
11. Updating our privacy statement

### 1. Controller

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Mr M. Boekhorst is the Controller of Signum Interfocus and can be contacted for questions about the way in which data are processed. He can be reached via the contact details above.

### 2. Personal data that we process

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Signum Interfocus processes your personal data for the services we provide and/or because we obtained your personal data in the context of an investigation or other assignment. Below is an overview of examples of the personal data we process:

- First and last name(s)
- Sex
- Date of birth
- Place of birth
- Nationality
- Information on proof of identity (e.g. document number)
- (Former) address details
- Telephone number (both business and private)
- E-mail address

- Location data (e.g. during observation)
- Bank account number(s)
- Information on partner and other family members
- Details of companies in which you are involved
- Payment experiences and credit information
- Salary data
- Training data (diplomas, certificates, etc.)
- Cadastral data
- Work history (including on the basis of curriculum vitae)
- Current job
- License plate(s)
- IP address
- Video recordings
- Photos and images
- Sound recordings
- Social media(posts)
- Website(s)

**Please note:** Signum Interfocus does not process all personal data listed above in all cases. The personal data we process, depends on the nature and purpose of the assignment we carry out. Signum Interfocus processes personal data provided to us by you or by our client. In addition, Signum Interfocus also collects personal data from public sources.

### **3. Special and / or sensitive personal data that we process**

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If necessary, Signum Interfocus B.V. processes special and / or sensitive personal data, i.e. data about criminal past. Signum Interfocus B.V. is allowed to process this data, because it has a permit under the ‘Wet particuliere beveiligingsorganisaties en recherchebureaus’. A unique number is linked to each license. Signum Interfocus B.V. is registered under license number 1790.

### **4. Purpose of data processing**

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Signum Interfocus processes personal data for the following purposes:

- Activities in the context of background investigations, fraud investigations and screening or other investigations aimed at (preventing) dishonest behaviour and fraud, which are carried out on behalf of third parties;
- Activities in the context of providing advice to third parties in the area of fraud prevention, governance, ethics and personal safety or in the field of other matters relating to fraud risks, risk management and integrity management;
- Activities in the context of giving advice to third parties in the field of cybersecurity or in the field of other matters related to (the use of) ICT and digital means;
- For the communication of findings to our clients;
- To execute our agreements;
- For sending invoices and making payments;
- Establish and manage the relationship with our customers (e.g. newsletter);
- Expanding our services (e.g. newsletter, marketing);
- If we are legally obliged to do so, such as information we need for our tax return;
- To answer your questions or to handle your complaints via social media, e-mail, by mail or by telephone;
- To process applications.

Signum Interfocus processes personal data solely on the basis of the principles stated in the GDPR.

### **5. How long we store your personal data**

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Signum Interfocus does not store your personal data longer than is strictly necessary to achieve the purpose(s) for which your data is collected. We use the following retention periods for the following categories of personal data:

- Customer and business relations: up to ten years after execution of the assignment, unless the law prescribes to keep them for a longer period. During this period it may be necessary that we still contact you or perhaps you would like to make use of our services again. Your contact details can also be kept longer if you have indicated that you wish to remain informed;
- Background- or fraud investigations: at least one year and a maximum of five years after execution of the assignment, unless a (possible) ongoing (legal) procedure takes longer;
- Pre Employment Screening: four weeks after execution of the assignment, all data will be destroyed, unless a (possible) ongoing (legal) procedure takes longer;
- Application information: up to a maximum of four weeks from the date on which the data was received, unless the applicant has given permission to keep the data for a longer period of time (in that case, a maximum of one year);
- Audio and video recordings: up to a maximum of four weeks from the date of admission, unless a (possible) ongoing (legal) procedure requires longer.
- Contact form or e-mail: if you fill in a contact form on the website, or send us a question by e-mail, we will only use your data to contact you and to handle your question or complaint. This data is not saved unless you become a client of Signum Interfocus.

## **6. How we protect your personal data**

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Signum Interfocus has taken appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification of your personal data. Data carriers in use at Signum Interfocus, its employees and any third parties involved are protected against unauthorized access. The digital data carriers on which personal data is stored are secured with encryption. Signum Interfocus also uses encrypted data transmission when exchanging data (both sending and receiving) with third parties. If you have the impression that your data is not properly secured or there are indications of abuse, please contact us.

With regard to conducting private investigations and the use of hidden cameras, Signum Interfocus performed a data protection impact assessment (DPIA).

## **7. Sharing your personal data with third parties**

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Signum Interfocus will not sell your information to third parties and will only provide this information to them if this is necessary for the execution of our agreements or to comply with a legal obligation. Signum Interfocus has concluded a processor agreement with companies that process your data on our behalf, to ensure the same level of security and confidentiality of your data. Signum Interfocus remains responsible for these processing operations.

## **8. Cookies, or similar techniques, that we use**

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Signum Interfocus uses technical and functional cookies. And analytical cookies that do not infringe your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly. We can also optimize our website with this. You can opt out of cookies by setting your internet browser so that it does not store cookies anymore. In addition, you can also delete all information previously saved via the settings of your browser.

Signum Interfocus websites can show links to external websites and organizations. Signum Interfocus has no responsibility with regard to the use of your personal data by those organizations. Always read the privacy statement of the website that you visit.

## **9. View, modify or delete your personal data**

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You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by Signum Interfocus. You also have the right to data portability. This means that you can submit a request to us to send the personal information we hold in a digital file to you or another organization. You can request access, correction or deletion; a request for the transfer of your personal data; withdrawal of your consent; or object to data processing by sending an e-mail to [info@signum-interfocus.nl](mailto:info@signum-interfocus.nl).

To ensure that the request for access has been made by you, we ask you to send a copy of your ID with the request. Your photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and social security number can not be visible on this copy. This is to protect your privacy. We will respond to your request as soon as possible, but in any case within four weeks.

## **10. Submitting a complaint**

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If you believe Signum Interfocus has made a mistake while performing its work, you can file a complaint. The director of Signum Interfocus will deal with your complaint, hear about your complaint and will make a decision about your complaint.

If you believe that your complaint has not been dealt with satisfactorily after completion of the procedure, you can send a complain to the Dutch national supervisory authority (Autoriteit Persoonsgegevens) within 6 weeks of receiving the decision of the director of Signum Interfocus. You can do so [here](#).

## **11. Updating our privacy statement**

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Signum Interfocus reserves the right to change this privacy statement at any time. Changes will be published on our website. We recommend that you regularly visit our website for the most recent version of this document.

This statement has been drawn up in both Dutch and English. If the English version shows differences with the Dutch version, we adhere to the Dutch version of this statement.