

## Privacy Policy Zinnovators

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## **I. INTRODUCTION**

1. In this privacy policy (hereinafter 'Privacy Policy') will be explained how Zinnovators B.V (hereinafter: 'Zinnovators') collects, uses and processes personal data related to their users and all people who are in direct contact with Zinnovators (hereinafter: 'Users' or 'you').

Personal data contains any information relating to an identified or identifiable natural person. The latter means a natural person that can be identified in a direct or indirect way.

This Privacy Policy is applicable to every kind of processing of personal data conducted by Zinnovators.

2. Your privacy is very important to us. This Privacy Policy is created to inform you about how we treat your personal data, and how you can exercise control over that data. It defines your legal rights and obligations towards Zinnovators.
3. The collection and processing of personal data is governed by strict conditions, enforced by the law. Zinnovators acts in accordance with :
  - i. the Dutch Privacy Law of 6 July 2000, and/or
  - ii. the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC;
  - iii. the Code of Conduct for mobile health applications.
4. This Privacy Policy is applicable, inter alia, to how our "Services" (being the services offered, following and linked to the Application, as defined hereafter) handle your personal data, these being:
  - A. The "Application" of Zinnovators, named the Zinnovators Mobile Alarm Platform as a (web)application
  - B. Our "Website" for both Users of the Application and visitors of our website who are not using the Application.

5. If you want to use our Services, we will first need your express approval (opt-in) of this Privacy Policy. This means you approve of how we collect, use and process your personal data.

You are not obliged to provide us with your personal data, however you must understand that we are not able to deliver you the Services in case you refuse to provide us with certain personal data.

6. We kindly invite you to read this policy carefully in order to fully understand the way Zinnovators handles your personal data.

Zinnovators can update this Privacy Policy from time to time by posting a revised version on our Website. Therefore, we recommend you to regularly consult this Policy, to make sure that you are always aware of any changes.

**II. WHO IS THE DATA CONTROLLER?**

7. Zinnovators B.V. takes responsibility of your personal data as a “data controller”. The specific company data are the following:

Zinnovators B.V.  
Peppelkade 48  
3392 AK, Houten

8. If you have questions about this Privacy Policy, or the manner in which Zinnovators collects, uses or otherwise processes your personal information, please contact us by sending an email to our DPO on by using the following e-mail address: [dpo-Zinnovators@Zinnovators.nl](mailto:dpo-Zinnovators@Zinnovators.nl)
9. Zinnovators can rely upon specialized service providers to process your personal data on behalf of Zinnovators in accordance with this Privacy Policy. Only the strictly needed data will be given to these companies (hereinafter: ‘processors of Zinnovators’).

**III. COLLECTED PERSONAL DATA**

10. Zinnovators can process data and information that has been sent by you or was provided by third parties insofar these are necessary or useful for the functioning of Zinnovators.

In order to inform you as best as possible, this Privacy Policy contains an overview of the categories of personal data that can be processed (this overview is not exhaustive, other kinds of personal data can be processed if this is needed). In this overview the context in which the personal data are collected or being processed will be given. This overview should be read together with the description of purposes for which Zinnovators processed personal data.

Category	Examples	Context
1/ Identity information of the User	Name, address, place and data of birth, nationality, mobile phone number, email address.	This kind of data is given by the User and are being processed when the User asks for information or when the data subject registers as a User in order to utilize the platform.
2/ Location status of the User	Location status via Google Maps.	The location of the User is automatically collected by using the Application.
3/ Contact information of the confidant or care institution?	Name, address, place and data of birth, nationality, mobile phone number, email address.	This kind of data is given by the User in order to contact the right

		person or institution when the emergency button is being used.
4/ Medical data	Medical information such as diseases as dementia, reasons for using the emergency button (heart attack, epileptic seizure...).	This data can be (but are not required) given to Zinnovators.
5/ The more technical aspects	IP-address, the version of the Application that is being used...	The IP-address is being linked to the version of the Application.
6/ Contact history between Zinnovators and the User	The information that regards to your contact details with Zinnovators by telephone, email etc as well as your interactions on the website with regard to Zinnovators and their services of their partners.	These data come from the interactions – of any nature – between the you and Zinnovators.
7/ Cookies on the Website	Data on clicking and viewing behavior of the User, devices of the User, IP-address, type of internet browser, type operating system or preferences.	This information is gathered by means of cookies. More on cookies in the Cookie Policy.

11. Zinnovators does not processes data that reveal race or ethnic background, or political beliefs, religious beliefs, membership of a union, sexual orientation, genetic or biometric data or medical data (unless given voluntarily).

#### IV. PURPOSES OF THE PROCESSING OF DATA

12. Zinnovators wants to highlight that it collects and processes your personal information for one overarching goal, i.e. to offer you a safe, comfortable and personalized Zinnovators-experience.
13. That being said, your personal data will only be processed for the next purposes, in particularly but not limited to:

Category	Processing purposes
1/ Identity information	<p>Phone number and identity information will be used when the User makes use of the emergency button. The processing of the phone number is necessary to make a conversation possible between the User of the emergency button and the contact persons.</p> <p>Furthermore, identity information will be used to carry out the agreement or to maintain the relation with the customers. These identity information can also be used for the following purposes:</p>

	<ul style="list-style-type: none"> <li>-</li> <li>- To send newsletters, if the User has given consent through the website or by email.</li> <li>- If the consent has been given for direct marketing purposes, these identity information can be used to keep the User posted of Zinnovators her services or products.</li> </ul>
2/ Location status of the User	In order to get the contact person informed about the location where he or she can find the person in need.
3 / Contact information of the confidend or care institution?	In order to make a conversation between the person in need and the confident person or trusted institution possible.
4/ Medical data	<p>This data can be processed to make sure the Application is adapted to the needs of the User.</p> <p>Moreover, this kind of data can be received and processed by the monitoring care center of Zinnovators in case the User has chosen this option.</p>
4/ The more technical aspects	In order to guarantee an optimal service.
6/ Contact history between Zinnovators and the User	In order to make sure the relation between Zinnovators and their User is been carried out as good as possible and if needed, can be adapted to the needs of the User.
7/ Cookies on the Website	More on cookies in the Cookie Policy.

## V. SHARING OF DATA

### 14. Zinnovators can disclose your personal data to the next receivers:

- third parties who assist Zinnovators in the execution, management and control of its activities, including reporting, support and computer security or the provision of specific services and products. It may happen that a third party is given the assignment to collect, process and / or analyze the personal data. Furthermore, it may be necessary to provide the personal data to a third party so that Zinnovators is able to deliver a product or service you have ordered. These third

parties may only use the data for the above purposes. Any other use is not included and is forbidden.

- Zinnovators will never provide your personal data to other third parties without prior permission, unless it is obliged to do so on the basis of a statutory provision or court order.

In the aforementioned cases, Zinnovators ensures that third parties only have limited access to the personal data necessary to perform the required specified tasks. Zinnovators will also ensure that third parties commit to using and using the personal data in a secure and confidential manner in accordance with the instructions from Zinnovators and its data protection policy.

15. Zinnovators stores your personal data within the EEA. Data is transferred to countries outside the EEA, however the necessary contractual safeguards have been taken in order to guarantee an adequate level of protection.
16. The personal data will also be used for direct marketing, provided you have given an additional explicit permission for this ("opt-in").
17. If you are already included in our mailing list for receiving marketing material in electronic form, Zinnovators can use your data for sending marketing related to Zinnovators's services.
18. In addition, Zinnovators can also pass on your data to its partners, in view of direct marketing.
19. This permission can be withdrawn at any time, without justification and free of charge, for example by clicking on the provided unsubscribe link, at the bottom of each promotional e-mail. You can also contact [dpo-Zinnovators@Zinnovators.nl](mailto:dpo-Zinnovators@Zinnovators.nl) or through the following address:

Zinnovators B.V.  
Peppelkade 48  
3392 AK, Houten

## **VI. HOW LONG WILL WE HOLD YOUR DATA?**

20. Zinnovators will not store your personal data longer than is necessary for the realization of the abovementioned purposes in the context of the contractual relationship. That is why we keep your personal data as long as your user account is active, or as long as it is necessary to keep the personal data to provide a certain service. When the contractual relationship comes to an end, most stored personal data will also be deleted. The data that will not be deleted will only be used for statistical or scientific research.

## **VII. SECURITY OF PERSONAL DATA**

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3992 AK Houten  
Nederland

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[info@zinnovators.nl](mailto:info@zinnovators.nl)  
[www.zinnovators.nl](http://www.zinnovators.nl)

KVK: 65157729  
BTW: 854149910B01  
IBAN: NL03 RABO 0308 8867 04

21. Zinnovators applies strict standards to protect the personal data under its control against unauthorized or unlawful processing and against unintentional loss, destruction or damage.

Zinnovators therefore takes technical and organizational measures such as encryption, antivirus, firewalls, access controls, strict selection of employees and suppliers, to prevent and detect inappropriate access, loss or disclosure of your personal data.

In the unlikely and unfortunate case that your personal data under the control of Zinnovators are compromised by a breach of information security, Zinnovators will immediately act to identify the cause of such breach and take action through appropriate remedial measures. If necessary, Zinnovators will, as well as the the Dutch Authority for the Protection of Personal Data, inform you of this incident in accordance with the applicable legislation.

## VIII. YOUR RIGHTS AS A DATA SUBJECT

### 1. RIGHT OF ACCES, RECTIFICATION, ERASURE, PORTABILITY OF DATA AND RIGHT TO OBJECT

21. For the purposes mentioned above you have:

- **Right of access** to your personal data that Zinnovators possesses. This means that you can ask Zinnovators: whether it processes your personal data, for what purposes this data is processed, which categories of data are processed, and to whom they are communicated.
- **A right to rectification** if you think your personal details are incorrect or incomplete.
- **A right to erase** your personal data. At the end of the contract that you have concluded with Zinnovators, you have the right to ask us to stop using your data. Zinnovators may, however, in the context of this declaration, keep track of the personal data required for the purpose of proof of transactions. Under this right to erase, you also have the right to ask Zinnovators at any time to stop using your personal data that is being processed on the basis of your permission or the legitimate interest of Zinnovators. Due to its legitimate interests, Zinnovators can still process your personal data after balancing your interests with that of Zinnovators, unless you decide to terminate the relationship with Zinnovators;
- **A right of portability of data** that you have provided to Zinnovators if your personal data are processed on the basis of an agreement or on the basis of your permission to send electronic communication and this personal data is processed by means of automated processes. Under this right you can ask Zinnovators to send your own personal data to yourself or send it directly to another data processing officer, as far as this is technically possible for Zinnovators.
- You have **the right to object** to the processing of your data for the purposes stated in Article IV.4. In this event, Zinnovators will stop processing your personal data, unless Zinnovators invokes compelling, justified and heavier weighing grounds for processing that outweigh your interests, rights and freedoms, or for instituting, exercising or substantiating a legal claim.

You can exercise your rights by sending a written request by mail, which is dated, signed and attached with a copy of your identity by e-mail to [dpo-zinnovators@zinnovators.nl](mailto:dpo-zinnovators@zinnovators.nl).

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KVK: 65157729  
BTW: 854149910B01  
IBAN: NL03 RABO 0308 8867 04

## 2. RIGHT TO OBJECT AGAINST DIRECT MARKETING

22. As indicated under IV.5, Zinnovators requests your permission to send you commercial information, advertising or personal proposals (via direct marketing campaigns or electronic newsletters). This applies in particular to communication to your mobile telephone number and e-mail address.

23. You have the right to object to the processing of your data for direct marketing purposes if you no longer wish to receive such communications from Zinnovators. In that case Zinnovators will no longer process your data for direct marketing purposes. Your application will be executed as soon as possible.

You can inform us of your objection in the following ways:

- By sending an e-mail with a copy of your identity card to [dpo-Zinnovators@Zinnovators.nl](mailto:dpo-Zinnovators@Zinnovators.nl)

However, the exercise of the right of retention cannot prevent Zinnovators from contacting you for any other purpose, including a legal obligation or performance of the contract, in accordance with this statement.

## 3. RIGHT TO SUBMIT A COMPLAINT

24. If you have complaints regarding the processing of your personal data, you can contact us as follows:

- By email : [dpo-Zinnovators@Zinnovators.nl](mailto:dpo-Zinnovators@Zinnovators.nl)

You can also submit a complaint to the Dutch Data Protection Authority, by post via the Bezuidehouthoutseweg 30 PO Box 93374 2594 AV The Hague or by telephone on 088 - 1805 250.

## IX. COOKIE POLICY



**X. CHANGE IN THE PRIVACY POLICY**

24. Zinnovators may decide in the future to change this privacy statement if it will, to the extent permitted by law, to process other (personal) data and / or provide this information to third parties not mentioned in this privacy statement.

**XI. APPLICABLE LAW AND JURISDICTION**

25. Dutch law applies to this privacy statement. Any disputes arising from this or otherwise related to this website will be submitted to the competent court of the registered seat of Zinnovators.

**XII. QUESTIONS OR REQUESTS?**

If you have any questions or requests about the privacy policy of Zinnovators, please contact:

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Peppelkade 48  
3392 AK, Houten  
[dpo-Zinnovators@Zinnovators.nl](mailto:dpo-Zinnovators@Zinnovators.nl)