

Privacy Statement

1. Introduction

RIWI Investments B.V., trading under the name Noverra Consultancy, located in Maassluis and registered with the Dutch Chamber of Commerce under number 98530720 processes personal data in the course of its advisory and consultancy activities. This privacy statement explains which personal data we process, for what purpose, and how we protect it.

2. Personal Data We Process

We only process personal data necessary for our services, including:

- Name, position, and contact details (address, phone number, email address)
- Company name and invoicing information
- Financial data for payments and administration
- Communication and correspondence details (such as emails or meeting notes)

We do not process special categories of personal data unless strictly necessary and only with your explicit consent.

3. Purposes of Processing

We use your personal data for the following purposes:

- Execution of an agreement or assignment
- Administrative processing and invoicing
- Communication regarding projects and assignments
- Improvement of our services
- Compliance with legal obligations, including fiscal retention requirements

We do not use your data for commercial mailings or automated decision-making.

4. Legal Bases for Processing

The processing of personal data is based on one or more of the following legal grounds:

- The performance of a contract (Article 6(1)(b) GDPR)
- Compliance with legal obligations (Article 6(1)(c) GDPR)
- Legitimate interest in maintaining client relationships and ensuring efficient business operations (Article 6(1)(f) GDPR)

5. Retention Periods

We do not retain personal data longer than necessary for the purposes for which it was collected.

- Administrative and financial records: 7 years (statutory fiscal requirement)
- Other data: a maximum of 2 years after completion of the assignment, unless longer retention is required by law or agreed with the client.

6. Sharing with Third Parties

We only share personal data with third parties when necessary for the execution of an agreement or to comply with legal obligations, such as:

- Accounting or bookkeeping services

- IT and hosting providers
- Legal or tax advisors, where applicable

We enter into data processing agreements with these parties in accordance with the GDPR. We do not share data with third parties for commercial purposes.

7. Security and Responsibility

We take appropriate technical and organizational measures to protect your data from loss, misuse, or unauthorized access.

These include:

- Secure (SSL) connections and encrypted storage
- Access restrictions and two-factor authentication
- Regular backups and security updates

The management of RIWI Investments B.V. is ultimately responsible for compliance with this privacy statement and for overseeing the proper protection of personal data within Noverra Consultancy.

8. Your Rights

Under the GDPR, you have the following rights:

- Right of access to your personal data
- Right to rectification or erasure
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to withdraw previously granted consent

You may submit requests using the contact details below. We will respond within 30 days.

9. Data Transfers Outside the European Economic Area (EEA)

If personal data is transferred to parties outside the EEA, this will only occur where the country provides an adequate level of protection (as determined by a European Commission adequacy decision) or where the European Commission's Standard Contractual Clauses are used.

10. Complaints and Supervision

If you believe that we are not handling your personal data properly, please contact us. You also have the right to lodge a complaint with the Dutch Data Protection Authority via www.autoriteitpersoonsgegevens.nl.

11. Contact Details

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RIWI Investments B.V., trading under the name Noverra Consultancy

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