

Privacy Policy

Introduction

This Privacy Policy describes the practices of **Sophisticated Agency** ("we", "us" or "**the Company**") with respect to data collected from users who access our website ("**Site**"), or who otherwise share personal data with us (collectively: "**Users**").

The Site means the information on **www.sophisticatedcloset.nl**.

The processing of your Personal Data (i.e. any information from which your identity may be derived by reasonable means; hereinafter referred to as "Personal Data") is necessary for us to carry out our contractual obligations to you and to provide our services to you, to protect our legitimate interests and to satisfy our financial and legal obligations.

By using the Site, you consent to the collection, storage, use, disclosure and other use of your Personal Information as described in this Privacy Policy.

We encourage our Users to read the Privacy Policy carefully and to use it to make informed decisions.

We receive your personal data from a variety of sources:

- When you voluntarily provide personal data to us in order to register on our Site;
- When you use or access our Site in connection with your use of our services;
- From third party providers, services and public registries (such as traffic analysis providers).
- From FOCUM Solution B.V. on our specific request to check the personal data you provide us to reduce our risk to possible 'no returns' of our products. After this data is received it will not be stored after it is used to determine our risk to you.

We collect two types of data and information from Users.

The first type of information is unidentified and non-identifiable information relating to one or more User(s), which may be made available or collected through your use of the Site ("**Non-Personal Data**"). We do not know the identity of any User from whom Non-Personal Data is collected. The Non-Personal Data that is collected may include aggregate data about your usage and technical data transmitted by your device, including certain software and hardware data (e.g., the browser and operating system your device uses, your language preference, access time, etc.) to improve the functionality of our Site. We may also collect information about your activities on the Site (e.g. the pages you have viewed, your browsing habits, clicks, actions, etc.).

The second type of information is **Personal Data**.

This is individually identifiable information from which a person can be traced, whether or not by making a reasonable effort. This type of information includes:

- **Device Information:** We collect Personal Information from your device. This information may include location data, IP addresses, unique identifiers (e.g. MAC address and UUID) and other information related to your activities on the Site.
- **Registration Information:** When you register with our Site, we ask you for certain information, such as: full name, email address or physical address and other information. On address and name combination we do a financial-risk request through FOCUM Solutions B.V.

We do not rent or sell User information to third parties.

We may use the information for the following purposes:

- To communicate with you - to send you messages about our services, to give you technical information, and to respond to any customer service issues you may have;
- To communicate with you and to keep you informed of our latest updates and services;
- To display advertisements to you when you use our Site (see "Advertisements" for more information);
- To market our Sites and products (see "Marketing" for more information);
- For statistical and analysis purposes, to improve the Site.

In addition to the purposes specified in this Privacy Policy, we may also share Personal Data with our trusted third party vendors, who may be located in other jurisdictions around the world. We may do so for the following purposes:

- To host and operate our Site;
- To provide our services to you, including a personalised view of our Site;
- To store and process such data ourselves;
- To show you advertisements and to allow us to evaluate the success of our advertising campaigns and to retarget our users;

- To provide you with promotional offers and promotional materials relating to our Site and services;
- To conduct research, technical diagnosis or analysis;

We may also disclose information when we believe in good faith that it is useful or reasonably necessary to share such information in order to: (i) comply with applicable laws, regulations, legal process or governmental requests; (ii) enforce our policies (including our Agreement) and investigate possible violations thereof; (iii) investigate, detect, prevent or address illegal activities or other violations, suspected fraud or security concerns; (iv) establish and exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, you or any third party; or for (vi) co-operate with law enforcement authorities and/or where we deem it necessary to exercise intellectual property or other rights.

You can:

1. Request confirmation as to whether or not personal data about you is being processed and access to your stored personal data, along with additional information.
2. Request an overview of the personal data you have voluntarily provided to us, in a structured, commonly used and machine-readable format.
3. Request us to correct personal data that we hold about you.
4. Request us to delete your personal data.
5. Object to the processing of personal data by us.
6. Request us to limit the processing of your personal data.
7. File a complaint with a supervisory authority.

However, these rights are not absolute and may be subject to our own legitimate interests and legal requirements.

If you wish to exercise any of the above rights or would like further information, please contact our Data Protection Officer legal@vermogensmonitor.nl.

We will retain your personal data for as long as necessary to provide our services and to comply with our legal obligations, resolve disputes and enforce our policies. Retention periods are determined taking into account the type of information collected and the purpose for which the information is collected, in view of the requirements applicable to the situation and the need to destroy outdated, unused information as soon as possible. We keep records of customers' personal data, account opening documents, notices and other items as required by laws and regulations.

We may correct, supplement or delete incomplete or inaccurate information at any time at your sole discretion.

We and our trusted partners use cookies and other technologies in our related services, including when you visit our Site or use our services.

A "cookie" is a small piece of information that a website gives to your device when you are viewing a website. Cookies are very useful and can be used for many different purposes. For example, they can help you navigate from page to page efficiently, enable certain features automatically, remember your preferences, and make it faster and easier for you to interact with our Services. Cookies are also used to ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

The Site uses the following types of cookies:

- a. **'Session Cookies'** which are stored only temporarily during an internet session to allow you to use the system normally. These cookies are deleted from your device when the browser is closed;
- b. **'persistent cookies'** which are only read by the Site, are stored on your computer for a certain period and are not deleted when the browser is closed. These cookies are used when we need to know who you are for repeat visits, so that we can, for example, save your preferences for the next time you log in;
- c. **'third party cookies'** set by other online services that provide content on a page you view, for example by third party data analysis companies that monitor and analyse our web access.

Cookies do not contain any information that can be used to identify you personally, but the Personal Data we store about you can be linked by us to the information stored in and retrieved by cookies. You may delete cookies by following the instructions in your device preferences, but if you choose to disable cookies, certain features on our site may not work properly and your online experience may be limited.

We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information about how often users access the Site, what pages they visit, and so on. We use the information obtained from Google Analytics to improve our Site and services. Google Analytics collects your IP address on the day you visit Sites, rather than your name or other information that could be used to identify you. We do not combine the information collected by Google Analytics with any personal data. Google's ability to use and share the information collected by Google Analytics about your visits to this Site is limited by the Google Analytics Terms of Use and Privacy Policy.

Collection of information by third parties

Our policy only addresses the use and disclosure of information that we collect from you and **FOCUM Solutions B.V.** If you disclose your information to other parties or on other sites on the Internet, different rules may apply to their use or disclosure of the information you have provided to them. Therefore, we encourage you to read the terms and conditions of any third parties to whom you provide information.

This Privacy Policy does not apply to the practices of companies that we do not own or control or of persons that we do not employ or direct, including third parties to whom we provide information as set forth in this Privacy Policy.

How do we protect your information?

We implement and maintain the security of the Site and your information with great care. We use industry-standard procedures and policies to ensure the security of the information we collect and maintain and to prevent unauthorised use of such information, and we require all third parties to comply with similar security requirements in accordance with this Privacy Policy. While we take all reasonable steps to protect all data, we cannot accept responsibility for the actions of any persons who gain unauthorised access to or misuse our Site and we cannot guarantee, either implicitly, explicitly or otherwise, that we will prevent such access.

Transfer of data outside the **EEA**.

Please note that some recipients of data are located outside the EEA. In such cases, we only share your data with countries which have been approved by the European Commission as offering an adequate level of data protection or conclude a legal agreement to ensure an adequate level of data protection.

We may use your Personal Data, such as your name, e-mail address, telephone number, etc., ourselves or with the help of our external subcontractors to provide you with promotional materials relating to our services that we think you may be interested in.

Out of respect for your right to privacy, we provide you with the opportunity within these promotional materials to indicate that you do not wish to receive future

promotional offers from us. If you opt out, we will remove your e-mail address or telephone number from our advertising list.

Please note that even if you have unsubscribed from our promotional emails, we may send you other important email messages for which we do not offer you the opportunity to unsubscribe. These may include customer service announcements or administrative notices.

Business Transaction

We may share information in the event of a business transaction (e.g. sale of a substantial part of our business, merger, consolidation or sale of assets). Should such a case arise, the recipient or acquiring company assumes the rights and obligations set forth in the Privacy Policy.

Minors

We understand how important it is to protect the privacy of children, especially online. The Site is not intended for or directed at children. We do not intentionally collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided Personal Information to us without consent, he or she should contact us via info@sophisticatedcloset.nl.

Updates or changes to this Privacy Policy

We reserve the right to update or revise the Privacy Policy from time to time. Substantial changes will become effective immediately upon posting of the revised Privacy Policy. The latest version will appear in the "Last Modified" section. Your continued use of the Platform following the posting of such changes on our website will signify your acknowledgement and acceptance of these changes to the Privacy Policy and your agreement to the terms of these changes.

How to contact us

If you have any general questions about the Site or the information we collect about you and how we use it, please contact us by **info@sophisticatedcloset.nl**.