HarrimanSteel B.V. (“**HS**”) Privacy and Cookie Statement (“**Privacy Statement**”)

Last updated: 10 November 2022

**DEFINITIONS**

To make meanings clearer in this document the following words have the following meanings:

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| “Agreement” | shall mean any agreement between Client and HarrimanSteel B.V. |
| “Agency”, “our”, “us” and “we” | shall mean HarrimanSteel B.V (registered in the Netherlands under company number 61831484) of Herengracht 320, 1016CE Amsterdam |
| Client”, “you, “your” and “yours” | shall mean the person or entity that has instructed us to undertake the Project and with whom we enter into an Agreement; |
| “Deliverables” | shall mean the output of any services provided or materials supplied, including without limitation printed material, graphics, drawings, models, artwork, photographs or negatives or any other work or material prepared or created pursuant to this Agreement; |
| “Fee” | shall mean the fees for the Project which shall be invoiced to you in accordance with the Agreement |
| “Project” | shall mean the work that we carry out for you in accordance with these Terms and Conditions which shall result in the Deliverables |
| “Quotation” | shall mean the approximate cost of the Project |

This is HS’s privacy statement. This Privacy Statement explains how we deal with personal information that we receive when you make use of our services.

HS is committed to your privacy and ensure that any personal information we process is protected and treated confidentially. We appreciate that you trust us with your information. In this statement we explain what personal information we collect from you and for what exact purposes we use your information. Our privacy policy is in accordance with the GDPR (EU General Data Protection Regulation).

If you have any question related to your privacy or this Privacy Statement in particular, please contact us at hallo@harrimansteel.com.

**THE COLLECTION OF INFORMATION BY HS**

When you make use of our services, we may collect your information in order to create and deliver the Project and the Deliverables. We receive your information because you directly provide it to us or because our systems collect this from you. We only process personal data if it is necessary to perform our Agreement, or it is necessary because we are required to do so by law.

Here are the specifics or what we collect and why we do it:

**Personal information and address**

When you contact us for a Quotation or Proposal and/or when you enter into an Agreement with us, we collect and use your personal details you provide us with such as: your full name, your e-mail, Client’s company name, your role/position at Client, phone number, the Client’s VAT number, Client’s address, and Client’s payment details. We process these details for general contacting purposes, to deliver the Project to you, to send any informational e-mails and updates about the delivery of the Project, to invoice the Fee and other payment purposes. We may also use your e-mail address to notify you of changes to our terms and conditions and changes to this Privacy Statement.

**Technical information and metadata, cookies**

We only collect necessary cookies, that enable us to operate our website. We collect functional and analytical cookies when you visit our website. Information that may be processed include: browser type, IP address, operating system details (version number and hardware ID) and network metrics (routes and latency).

We use this technical information to correctly provide our website and to optimize your experience. Our websites uses Google Analytics to count visitor number statistics.

We process technical information on the basis of our legitimate interest to do so, namely our legitimate business interest to provide our services and improve our services for the benefit of our Clients.

**DURATION**

We will retain your personal information no longer than is necessary for the purposes for which they are processed, unless we need to comply with legal obligations, in which case we might store your information for a longer period of time.

**SHARING YOUR INFORMATION**

We will only share your personal data with third parties if this is necessary for the provision of our Projects and Deliverables, our other services and the improvement of these services. We will explicitly never sell your personal data to third parties.

Furthermore, we may share your personal data with third parties as an exception if we have a legal obligation to do so. Currently, no such obligations are applicable to our services and thus we do not share any information with third parties based on this exception.

**NEWSLETTER**

We send news updates by email to inform interested parties of developments. You will only receive newsletters if you have subscribed to them yourself, thereby giving your consent according to art.6 (1)a GDPR. Every newsletter features a link at the bottom that you can click in order to unsubscribe. You can also (un)subscribe to the footer of our website. We send our newsletters through MailChimp, a system in which only your name and email address are stored.

**YOUR RIGHTS**

The General Data Protection Regulation (GDPR) applies to our processing of your information. Under the GDPR, when we process your information, you have certain rights as a Data Subject, namely the right to:

* Access your personal data and Data portability. This means that you have the right to receive your personal information in a structured, accepted and machine-readable format.
* Rectify any personal data which is in accurate;
* Deletion of any of your personal data we store;
* Object to the processing of your personal data by us;
* Restrict the processing of your personal data to certain situations;
* Withdraw consent that previously given.

When HS is the data processor of your personal information, you can exercise any of these rights directly against us.

For more information on how to exercise your rights as a data subject, or to actually exercise one of your rights against us, please email us at hallo@harrimansteel.com.

If you have a complaint about the way we process your information, you have the right to file a complaint with the Autoriteit Persoonsgegevens (the Dutch Data Protection Authority). A complaint can be filed [here](https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap).

**SECURITY**

We take reasonable administrative, physical and electronic security measures that are designed to protect your information from unauthorized access, use, disclosure or any other form of unlawful processing of personal data. In particular, we make sure that all information on our hardware and software is encrypted to prevent unauthorized access.

**CHANGING THIS PRIVACY STATEMENT**

We may update this Privacy Statement. Any change to this Privacy Statement shall be announced on the website of HS.