

Privacy & Cookie Policy

Version 0.1
Date 22 November 2017

1 Introduction

1.1 Why a Privacy and Cookie policy?

This document provides an overview of the measures taken by Keeper to guarantee the privacy of its customers and the confidentiality of the collected data. Processing the (personal) data in a confidential manner is pivotal. Keeper acknowledges the importance and takes sufficient measures to its best extent possible to guarantee confidentiality and privacy of the data collected. This Privacy and Cookie Policy gives clarity about the way your (personal) data is being processed.

This Privacy and Cookie Policy covers personal data from visitors of the Keeper website and of subscribers of the Keeper tool. By using the Keeper website, the Keeper tool or other services of us, we can collect data from and about you. For example, when you get a subscription to the Keeper tool and you provide us personal data for processing the contract to enable you using the Keeper tool, we process these data. Besides, also when you use the Keeper (mobile) website or if you get in contact with us via other channels (phone, email, etc.). In such a case, you are the data subject (in Dutch: 'betrokkene') – in terms of privacy laws – and we are the data controller (in Dutch: 'verantwoordelijke').

2 Privacy

2.1 Who are we (who is the data controller)?

The Keeper software and website are owned and exploited by Ruler B.V.. Ruler B.V. is an initiative of Charco & Dique B.V..

<p>Ruler B.V. Krijn Taconiskade 422 1087 HW Amsterdam</p> <p>Ruler B.V. is registered at the Dutch Chamber of Commerce with the number 69037555.</p> <p>Get into contact with Ruler by:</p> <ul style="list-style-type: none">• Calling to (+31) (0)20 41 65 403, or• Sending an email to info@ruler.nl.	<p>Charco & Dique B.V. Krijn Taconiskade 422 1087 HW Amsterdam</p> <p>Charco & Dique B.V. is registered at the Dutch Chamber of Commerce with the number 34377693.</p> <p>Get into contact with Charco & Dique by:</p> <ul style="list-style-type: none">• Calling to (+31) (0)20 41 65 403, or• Sending an email to info@charcoendique.nl.
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Get into contact with Keeper by calling to (+31) (0)20 – 41 65 403 or by sending an email to info@keeper.nl.

2.2 What type of (personal) data does Keeper collect and process?

We collect data at different moments in time. Not all data that is being gathered are personal data, but for us it is important that you understand what kind of data we may collect from you.

Below we provide you an overview of the data we collect. If you conduct more actions at the same time, for example having a subscription for Keeper and visiting the (mobile) website of Keeper, we collect all data that is related to these actions. Besides, we can also collect data from your actions relating to the Ruler website, the Ruler tool (see www.ruler.nl) and the Charco & Dique website (see www.charcoendique.nl). By collecting these types of data, a profile of your personal data and/or preferences can be developed.

You can choose to not provide certain kinds of personal data to us. Only the data that we ask and have an * icon, or when we indicate that it is obligatory to provide us, must be provided to us in order to ensure the service provision. Via your browser settings or the settings at your mobile device (e.g. phone or tablet), you can choose what kinds of data you want to share with us.

The overview of (types of) data from you that we collect and process:

- By creating a Keeper account for you at the Keeper (mobile) website we collect the personal data that you (or the administrator of your organisation) provide to us, or to which you (or the administrator of your organisation) have given us access, when creating the personal account. This involves amongst others your name, username and email address. For organisation accounts we collect data from the organisation such as organisation type, organisation registered name and license type.
- By using our (mobile) websites (i.e. Keeper, Ruler, Charco & Dique) we collect information about your activities as a user, such as the pages you visit, how long you visit the pages, the amount of times you visit the websites and the search words you use in the search engines of our websites. It is also possible that you share your browser settings with us.
- By reading emails or notification messages from Keeper (or Ruler or Charco & Dique) we collect data about for example what subjects you open and/or read, how often you open and/or read the information and whether you use search words.
- By getting into contact with us via phone, email or differently (feedback button on the websites) we collect your personal data such as contact details (e.g. name and email address) together with your question, remark or complaint.

2.3 What do we do with the collected data?

We do not collect your data without a useful purpose. We collect the data for the following goals:

- To improve our products and services continuously by analysing the collected data. By analysing the data, we are for example able to adjust our products and services to your desires. The data of users from the websites or the Keeper tool are collected and analysed in an aggregated (and often anonymised) manner. Though, it is incidentally possible that we receive reports of the analyses of the data in a manner in which personal data is described. Of course, we strive to avoid such situations.
- The data that you provide to us (or the administrator of your organisation provides to us) by subscribing to the Keeper tool, are used to send you news or notifications.
- The data that you provide to us by contacting us via email, phone or differently (feedback button at the websites) are used to answer your question, remark and/or solve your complaint.

We do not collect data regarding the documents that you store in the front end of the Keeper tool, for example when uploading evidence for a finished task. These documents are of course visible and accessible for you (the user), but are not visible and/or accessible for the Keeper employees. Please keep in mind that certain (third) parties have a legal audit authorisation and can force Keeper to get access to your usage of Keeper including the data in the Keeper tool.

2.4 How does Keeper secure the collected data?

We have taken measures to guarantee the confidentiality and privacy of the data. Keeper makes use of security protocols (such as the secure socket layer) that guarantee the confidentiality of the communication between the user and Keeper. Keeper aims to warrant the confidentiality of the communication with its products and services by the correct usage of such security protocols. The data is also stored in a secured manner via a hosting provider that has taken the necessary control measures to ensure the integrity and confidentiality. Also, personal

data and statistical data about the usage of Keeper is not provided to third parties, unless it is necessary for the execution of the contract with the user (this includes amongst others hosting activities and invoicing) or a lawful injunction from a judicial authority.

2.5 What is the retention period for the data collected?

As long as you use the Keeper tool or the website we process and store the data for you. When you resign the contract the data about your usage of the Keeper tool and website are deleted. As maximum retention period, we employ a two-year period after you have resigned the contract. Retention of the data for a longer period is only allowed when the personal data are necessary to comply with a retention period that is legally obligated.

2.6 Do you have questions or remarks regarding the use of your personal data? (your rights as data subject)

This Privacy and Cookie Policy concerns your personal data. That is the reason why you have influence on how we can use your data. You have the right of viewing, rectification, deletion and limitation of using the data we have about you. In certain circumstances, you can object that we use your data. You can also request, if technically possible, for transfer of your data to other parties.

The above means that you can request us what personal data we process from you. Within the rules of the game of the law, we provide you an answer on such requests. You also have the right on correction or removal of your data. To a significant extent, you can manage this yourself via your account and your browser settings and (mobile) device. If we have asked you consent for processing your data, you are always able to revoke your consent.

2.7 Do we share your data with other third parties?

Yes, we share data. Mainly because we have not developed the product Keeper ourselves as we are no software company. Therefore, we make use of the services of Microsoft (Azure), Universal IT and Webbeat for hosting, the management and support of Keeper and the Keeper website. According to the law, we share your data with these parties when using their services. These parties are instructed by us.

Personal data can also be shared with parties in countries outside the European Economic Area. In case we do so directly, we will take measures that are reasonably necessary to guarantee the security of your data.

2.8 Changes in this Privacy and Cookie policy

Everything in life is subject to change, also our Privacy and Cookie policy. If we make fundamental changes to the policy that (can) have a significant influence on your rights or the consent you have given us to process your data, we will inform you personally (if possible). You can see the date and version number to check whether this is the version of the policy you have read before.

3 Cookies

Cookies are small and simple text files that we place at your computer, mobile phone or tablet when you visit our websites. The cookies track information about your visits on the websites. During your next visit on one of our websites with the same device, the information from the text file (cookie) will be consulted so we can recognise you.

You can configure your browser to prevent cookies being installed at your device. This still allows you to visit the Keeper home page. Unfortunately, you will not be able to log in at Keeper without cookies being installed at your device. Cookies are used to assess whether you are still logged in in Keeper and your session is still valid. Besides, cookies are used to improve the service provision and your user experience. Finally, Keeper makes use of functional and analytical cookies (such as Google Analytics and social media cookies) to improve the services/products you use.

The information that is stored in the cookies will only be used by Keeper and the parties that provide services to us based on the cookies. These parties are described in this policy. Of course, your data will not be shared with third parties without your consent.

The following table provides a schematic overview of the cookies that Keeper uses:

Name script / cookie	Technique	Description
Analytical cookies	Cookie	Cookie to improve the user experience
Google Analytics	Cookie	Cookie to gather statistical data
Social media cookie	Cookie	Cookie to enable you to share content via social media buttons
Session cookie login	Cookie	Cookie to remember that you are logged in
Settings	Cookie	Cookie to save your most recent (temporary) settings such as arrange settings.

4 Contact

In case you have questions about this Privacy and Cookie policy or your data (request to view, rectification or delete your data), please let us know via info@keeper.nl.