

## Data Protection Policy 25/05/18

### 1. This data protection policy is published on May 25, 2018.

Bird Control Group is committed and obligated to protect and respect your privacy and data in compliance with EU-General Data Protection Regulation (GDPR) 2016/679, dated April 27th 2016.

This privacy document explains the reason of your data collection, type of the data that is collected and how it is being used by Bird Control Group and/or its partners and how Bird Control Group and/or its partners keep the data secure. This Data Protection applies to the use of products, services, sales, marketing, finance, operations and customer journey of Bird Control Group and individuals applying for jobs at Bird Control Group.

#### 1.1. Data Controller and Processor

Bird Control Solutions BV, Molengraaffsingel 12, 2629 JD Delft, The Netherlands (Head office) is the data controller. In some cases, our partners (international resellers) and service suppliers (software, platforms etc) act as independent data processors but sometimes they are also acting as our data processors when it comes to handling proposals and inquiries in the country of their operation.

#### 1.2. Data Collection

This section is about when, why and on which legal basis we collect data as well as which type of data we collect and for how long we keep that data.

##### 1.2.1. When we collect your data

We collect your data:

- when you enter into a contract with us or are using our products/services;
- when you fill in the forms on our website to get bird problem assessment;
- when you interact with Bird Control Group and its partners in person, through emails, by phone, via social media, websites;
- from our partners when you give your consent to share your data with us;
- when it is in both of our interests: when you apply for jobs at Bird Control Group or leave your personal data on the websites or social media to be contacted;

##### 1.2.2. Why we collect your data

We collect your data for the following purposes:

- To fulfill the obligations we have to you under an agreement we have with you;
- To prepare tailor-made bird problem assessment for you;
- To communicate with you by emails, phone etc. to provide relevant and useful for you information;
- To follow up on incoming inquiries or requests (sales support, customer support, emails, phone calls);
- To send you information about the product and/or services you have interest in and/or purchased from Bird Control Group or its partners;
- To perform direct sales activities with legitimate interest for you and Bird Control Group or its partners;
- To share with you brochures, flyers, articles you have signed up for;
- To prepare invoices, reminders, confirmation emails;
- To make you aware of the latest news on Bird Control Group and its products and services;
- To get in touch with you for sharing your opinion on the quality of our products and services (survey, customer satisfaction evaluation etc.);
- To process your job application in our system or system of third parties ([monster.com](https://www.monster.com); [indeed.com](https://www.indeed.com));
- To improve our products and services and to do statistical analysis;

### **1.2.3. Legal basis for data collection**

We collect your data based on the following legal basis:

- Consents: we use your personal data when you give permission for us to do so, for instance by agreeing with our Terms and Conditions and Data Protection Policy. This consent could be for collecting and proceeding your personal data (via website forms or application forms for more see 1.3 chapter). We also ask for consent when collecting your behavioral information via cookies, please, check our cookies policy for that.
- Contracts: we use your personal information to enter into agreements and for performing contractual obligations such as customer order processing, order confirmations, invoices etc;
- Legitimate interest: we collect and use your data if it is in legitimate interest of Bird Control Group or/and its partners. We make sure that your personal data is used in the way that it doesn't violate your legal rights. Legitimate interest can be our commercial interests and product development;
- Legal obligation: in some cases the law requires us to process personal data, i.e. rules concerning accounting or taxes.

### **1.3. Type of personal data collected**

We collect the following personal information:

- first and last names, email, country and information about the industry where your company operates and/or has bird problems;
- feedback or service-related information from you about our products and/or services from face-to-face meetings with you, phone calls, emails or documentations;
- actions taken on the website for the optimization of the website and making it more user-friendly as well as IP-addresses which are collected by the web analytical tools we use;
- photo and video materials from the field where we installed our system (bird repellent product) for documenting user case and commercial use - making testimonials and sharing them on our social media channels;
- information about your bird problem (area, when the bird problem exists, that you or an appointment person (sales manager) from Bird Control Group or partner's company fill(s) in the survey using our online assessment tool for your bird problem;
- first and last names, email address and your CV are collected for job application purposes;

### **1.4. How long we keep your data**

Customer-related personal information is kept as long as the customer remains a customer, but for a maximum of 25 years after the relationship ends. However, obsolete data might be removed earlier.

Prospect-related personal information is stored in our CRM system as long as we find it necessary for a reasonable period of time to fulfill the purpose for which the personal data was collected unless a customer opts out. This period can include processing your inquiries or requests, helping you with the assessment of your bird problem, following up after our products and/or services were purchased or following up with you in a year, two (or any other agreed period of time) to proceed with your inquiry. Usually, we delete this after 10 years in case there is no follow up into a contract.

Job applicant's personal data is stored for no longer than a year.

When the personal collected data is no longer relevant or required, we make sure that all the information about you is securely deleted and not used by us or anyone else. We can only process data for statistical and analytical purposes but we keep the data anonymized.

### **1.5. How we secure you data**

We use appropriate technical and organizational measures to keep your data safe such as code encryptions of sensitive information or limited access to sensitive information granted to the specific individuals.

## **2. Your rights to personal data (8 rights);**

According to the latest data protection and privacy policy, the General Data Protection Regulation (GDPR) you have the following right to make certain request with respect to your personal data:

1. The right to request a copy of your personal information;
2. The right to request correction of your personal data that you consider as inaccurate or outdated;
3. The right to request deletion of your personal data;
4. The right to object to data processing, for instance to opt out and be “forgotten” so you won’t give any consent anymore to use or retain your personal information for e-marketing purposes (emailing). This can be done either by clicking on “unsubscribe” button or by contacting us directly with your request;
5. The right to data portability for transferring the personal data you supplied to us to you or another data controller ;
6. The right to request restriction on processing your private data for retaining it but not using it anymore;
7. The right to be informed on which type of data we collect, how it is used and who uses it;
8. The data subject right not to be subject to concerning you;

## **4. Is data shared with anyone?**

Your personal data is not going to be shared or disclosed with any third parties without your consent except from the following situations:

- Our resellers and partners may have access to your personal data with the purpose of providing our services to you, these resellers might be located outside of the EU in case you are located in the EU and General Data Protection Regulation (GDPR) is applicable, the resellers located outside of EU must treat your personal data according to GDPR ;
- Your data will be shared with the third parties/our suppliers including recruitment platforms if you are an applicant for our job positions, analytical tools, order processing software and etc.

## **5. Complaints and query**

If you are unhappy with the way in which your personal data has been processed, or want to make a request as described in this statement, please contact [privacy@birdcontrolgroup.com](mailto:privacy@birdcontrolgroup.com).

In case you have given us consent to process your personal data, you can at any time revoke that consent. However, we may have another legal basis to process your personal data.

You can also file a complaint with the supervisory authority.

## **6. Use of cookies**

We use a few cookies on our website to make our content more personalized. We use the collected information to better understand user behavior, which parts of our websites people have visited more often and why and measure the effectiveness of advertisements and web searches. Eventually we aim to optimize the website in the way that is most valuable for the visitors. Please, take a look at our Cookies Policy for more detailed information.