

April 2019

Article 1 Definition

The following definitions are used in this Privacy Policy:

True Value:	the private company True Value BV, established at Oude Rijkstraatweg 12a, 3941 BR Doorn, registered with the Chamber of Commerce under number 50775804;
Data subject:	the natural person to whom the Personal data relates;
Personal data:	any information relating to an identified or identifiable natural person that is processed by True Value;
Agreement:	the agreement between True Value and the Data subject where the Data subject uses the service of True Value;
Website:	the website www.meplusu.nl , www.portal.meplusu.nl and the associated application (s) managed by True Value;

Article 2 Personal data

1. Dealing carefully with Personal data is of great importance to True Value. Regarding the processing of Personal data, True Value acts in accordance with the applicable laws and regulations.
2. True Value takes great care with your Personal data and will always treat such data confidentially.
3. True Value collects Personal data from the Data subject as provided to True Value through the Website or when the Data subject visits the Website or has contacted True Value by telephone or email.
4. True Value collects and processes the following Personal data:
 - first and last name;
 - email address;
 - answers to questions.
5. True Value does not process any special Personal data of the Data subject.
6. The Website and / or service do not intend to collect data on Data subjects who are younger than 16 years, unless they have consent from a holder of parental responsibility over the child. True Value shall make reasonable efforts to verify in such cases that consent is given or authorised by the holder of parental responsibility over the child, taking into consideration available technology. If, however, it appears that Personal data on a person below the age of 16 is collected without this consent the holder of parental responsibility can contact True Value using the contact details included in Article 11.1 and True Value will terminate the processing and erase Personal data. Even so, True Value advises holders of parental responsibility over an child to be involved in the child's online activities in order to prevent data on the child is being collected without their consent.

Article 3 Offer

1. The basis for processing is that it is necessary for the execution of the Agreement or in order to take steps at the request of the Data subject prior to entering into an agreement.
2. True Value collects and processes Personal data for the following purposes:
 - generating Drive profiles (“drijfveerprofielen”);

- handling a question and / or comment from the Data subject;
 - in order to be able to contact the Data subject for the execution of the Agreement;
 - to fulfil administrative duties.
3. The provision of the name and email address of the Data subject is a contractual obligation. Without the name and e-mail address no agreement can be reached.
 4. True Value will not store Personal data for longer than is strictly necessary to achieve the purposes, as described in Article 3.2, for which Personal data is processed.
 5. True Value only processes Personal data for the period necessary for the purposes for which it was provided. True Value aims for data minimisation.
 6. True Value will not process Personal data for purposes other than those described above.

Article 4 Newsletters

1. Newsletters are only sent to the Data subject after unequivocal consent of the Data subject.
2. True Value will not approach the Data subject for direct marketing purposes if the Data subject has not given his or hers consent.

Article 5 Unsubscribe from newsletters

1. The Data subject can unsubscribe from newsletters in the following ways:
 - by clicking on the link in the e-mail which includes the newsletter;
 - by contacting True Value (see Article 11.1 for contact details).
2. In every newsletter that is sent to the Data subject, a link to unsubscribe is included.

Article 6 Erasure of Personal data

1. True Value will erase Personal data from its systems without undue delay, if:
 - Personal data are no longer needed for the purposes for which they were processed;
 - the Data subject objects to the processing of his Personal data and this objection is justified;
 - the personal details are incorrect or outdated.
2. True Value is not obliged to erase Personal data in case a legal exception to 'the right to be forgotten' occurs.

Article 7 Providing Personal data to third parties

1. True Value will not provide Personal data of the Data subject to third parties until:
 - True Value has explicitly obtained prior consent from the Data subject;
 - there is a legal bases for the transfer of Personal data to a third party;
 - it is necessary for the execution of the Agreement;
 - the Personal data is provided to a processor brought in to execute the Agreement which obliges the processor to ensures sufficient guarantees for technical and organizational security measures with regard the processing.
2. The Data subject may withdraw his consent to provide Personal data to third parties at any time.

Article 8 Right to access, right to data portability, rectification and erasure

1. Upon request, True Value grants the Data subject access to all Personal data processed by True Value and True Value provides the Data subject with a free copy of this data in such a form that the Data subject can provide the Personal data to a third party.
2. True Value offers the Data subject the possibility to have any incorrect Personal data rectified or erased free of charge.
3. The request for access, rectification or erasure of data can be submitted to True Value in writing or by email (see Article 11.1 for contact details). True Value will respond to such a request as soon as possible and in any case within 4 weeks.

Article 9 Right to object

The Data subject has the right to object to processing his Personal data on grounds relating to his or her particular situation. After True Value has received the Data subject's objection, True Value will stop processing Personal data of the Data subject, unless True Value has legitimate interests in the processing of Personal data that outweighs the interest of the Data subject.

Article 10 Right to restriction

If a request has been submitted by the Data subject for rectifying, supplementing or erasing his Personal data or if an objection concerning the processing of his Personal data has been submitted and processing and execution of this request or that objection will take some time, the Data subject may request True Value to restrict the processing of his Personal data.

Article 11 Contact

1. Questions regarding the processing of Personal data, withdrawal of consent, access to the Personal data, request for a copy of Personal data, request for rectification or erasure of Personal data, request for restriction the processing of his Personal data or filing an objection against the processing of his Personal data, can be addressed to True Value through:
 - Post address: True Value B.V. , Oude Rijkstraatweg 12a, 3941 BR Doorn;
 - E-mail:
 - Mobile phone: +31 (0)651065409.
2. True Value will inform the Data subject if True Value, due to a request of the Data subject, has rectified, supplemented or erased Personal data or terminates or limits the processing of Personal data or if True Value has processed a withdrawn consent.

Article 12 Security measures

1. To prevent unauthorized access to Personal data, loss, theft and unauthorized use of Personal data, True Value has taken various security measures, including measures against unauthorized access, use, alteration, unlawful and unintended destruction and unintended loss of Personal data.
2. Data provided to True Value through the Website is encrypted. True Value uses an HTTPS connection.

Article 13 Third party Privacy Policy

This Privacy Policy does not apply to third party websites, such as social media websites that are linked to the Website. True Value does not accept any responsibility or liability for the way these websites handle personal data. For further information on how these third parties handle personal data and suchlike, the privacy policy of the particular website must be consulted.

Article 14 Changes

True Value reserves the right to make unilateral changes to this Privacy Policy. The Website contains the latest version of the Privacy Policy of True Value.

Article 15 Data breach

1. If a security incident has occurred at True Value where sensitive personal information has been leaked or as a result of which there is a serious adverse effect on the protection of the processed Personal data for another reason, True Value will, if possible, report the data breach to the Dutch Data Protection Authority within 72 hours after and act in accordance with the AVG (Algemene Verordening Gevensbescherming).
2. If there is a data breach at True Value that has unfavourable consequences for the privacy of the Data subject, True Value will inform him or her immediately.

Article 16 Cookies

1. True Value makes use of functional and analytical cookies.
2. A cookie is a small text file that is stored in the browser of the Data subject's device on the first visit to the Website.
3. The Data subject may opt out of cookies by selecting the appropriate settings on his internet browser. In addition, the Data subject can also delete all information previously saved by selecting the appropriate settings of his browser. Further information about switching on and off and removing cookies can be found in the instructions and / or with the help of his browser's Help function. Functional cookies are necessary for the correct functioning of a website. If the Data subject removes functional cookies, this may have consequences for the correct functioning of the Website and it is possible that True Value cannot provide its service properly or not at all.
4. Type of cookies and purpose:

Party storing the cookies	Type of cookie	Purpose
True Value	Functional cookie	Functional cookies ensure that the website functions properly. These cookies are used, for example, to make sure that the Data subject can log in to the website. With functional cookies the website can recognize the Data subject when he or she visits the website again. This is convenient for the Data subject, so he or she does not have to log in to the website every new visit.
True Value for the use of Google Analytics	Analytical cookie	By using analytical cookies, True Value can see how the Data subject uses the website, so True Value can improve the website. Analytical cookies are not shared with third parties, are not used by third parties and are not linked to the name or e-mail address of the Data subject. True Value has set Google Analytics in such a way that visitors to the website remain anonymous.

Article 17 Complaints

If the Data subject believes that the processing of Personal data by True Value is not in accordance with this Privacy Policy and / or with the applicable laws and regulations, the Data subject can lodge a complaint with the Dutch Data Protection Authority.