

PRIVACY STATEMENT

12Group

Chamber of Commerce (KvK): 86515047

Hereinafter referred to as: "12Group"

This privacy statement explains how 12Group processes personal data collected via the website 12group.nl and through other points of contact, such as email, telephone, quotations, assignments, and business communications. 12Group processes personal data in accordance with the General Data Protection Regulation (GDPR) and relevant Dutch legislation.

1 - Controller and Contact Details

12Group is the data controller responsible for processing personal data as described in this privacy statement.

Contact details:

Email: info@12group.nl

Website: 12group.nl

2 - Scope

This privacy statement applies to all personal data processed by 12Group in connection with:

- the use of the website 12group.nl
- requesting services, quotations, and information
- performing agreements and providing services
- business communications and support
- marketing and sales activities, where legally permitted
- the use of external services and tools, such as Statcounter

3 - What Data Does 12Group Process?

12Group only processes personal data necessary for the purposes described in this statement. This may include:

- **Identification data:** name, date of birth (if relevant), gender (if relevant)
- **Contact details:** email address, telephone number, address, billing information
- **Company data:** company name, Chamber of Commerce number, VAT number, position, department

- **Communication data:** emails, chat messages, notes, correspondence
- **Assignment data:** scope, deliverables, deadlines, feedback, project information
- **Payment and invoicing data:** bank account, invoice, and payment information
- **Technical data:** IP address (partially anonymized), device and browser information, session data
- **Cookies and tracking data** (as described in the cookie policy)
- **Other data** voluntarily provided or necessary for providing the service

12Group does not process special categories of personal data (e.g., health data) unless explicitly and in writing agreed.

4 - Purposes of Processing

12Group processes personal data for the following purposes:

- Executing and managing agreements and services
- Sending quotations, invoices, reminders, and correspondence
- Maintaining customer relationships and support
- Improving services, processes, and the website
- Complying with legal obligations (e.g., tax retention requirements)
- Ensuring system security and preventing misuse
- Performing analyses and statistics (e.g., via Statcounter)
- Responding to requests from competent authorities
- Handling complaints and disputes
- Marketing activities, only where legally permitted and with consent where required

5 - Legal Basis

12Group processes personal data based on the following legal grounds:

- **Performance of a contract (Art. 6(1)(b) GDPR)**
- **Legitimate interest (Art. 6(1)(f) GDPR)**
For example, security, administration, service improvement, customer contact, fraud prevention, and compliance with laws and regulations
- **Consent (Art. 6(1)(a) GDPR)**
For non-essential cookies, marketing communications, and other processing requiring consent
- **Legal obligation (Art. 6(1)(c) GDPR)**
For example, tax retention requirements and other statutory obligations

6 - Retention Periods

12Group does not retain personal data longer than necessary for the purposes for which it was collected, unless a statutory retention requirement applies. Retention periods are

determined based on:

- contractual obligations
- statutory retention periods
- business necessity
- security and risk assessments

Examples of retention periods:

- Administration and invoices: according to tax retention obligations (usually 7 years)
- Contact details of leads: maximum 2 years after last contact, unless longer retention is necessary
- Website data and cookies: in accordance with the cookie policy and technical requirements
- Incident and security data: according to internal security procedures and legal obligations

7 - Sharing Data with Third Parties

12Group may share personal data with third parties when necessary to provide services or comply with legal obligations. This may include:

- Hosting and IT service providers
- Accounting and administrative partners
- Payment and collection service providers
- Legal advisors, accountants, and external consultants (if necessary)
- Statcounter (for analytical purposes)
- Government authorities and law enforcement agencies, when legally required
- External parties for performing (parts of) services, such as freelancers or subcontractors

12Group enters into appropriate data processing agreements with these parties or ensures another lawful basis for the transfer. If data is processed outside the EU/EEA, appropriate safeguards are applied, such as standard contractual clauses or other mechanisms recognized by the Dutch Data Protection Authority.

8 - Statcounter and Analytical Cookies

12Group uses Statcounter to collect website statistics. Statcounter acts as a processor for 12Group.

The collected data is anonymized and is not used to identify individual visitors. Statcounter may collect technical data, such as IP address (partially anonymized), device and browser information, visited pages, and timestamps.

Consent for these cookies is requested via the cookie banner. You may withdraw your consent at any time via your browser settings or via the cookie settings on the website.

9 - Security of Personal Data

12Group takes appropriate technical and organizational measures to protect personal data against loss, theft, unauthorized access, and misuse. These measures include:

- Data encryption where possible
- Secure connections (HTTPS)
- Access management and authorization controls
- Minimal data processing and data minimization
- Regular backups, updates, and security patches
- Security procedures for incidents and data breaches
- Internal instructions and employee training
- Use of reliable and secure software and systems

10 - Data Subject Rights

You have the following rights regarding your personal data:

- Right of access
- Right to rectification
- Right to erasure (if no legal retention obligation applies)
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to withdraw consent (if processing is based on consent)
- Right to lodge a complaint with the Dutch Data Protection Authority

Requests can be sent to info@12group.nl. 12Group will assess requests and respond within the statutory timeframe. If requests are unlawful, incomplete, or unclear, 12Group reserves the right to request additional information or refuse the request within the limits of the law.

11 - Automated Decision-Making and Profiling

12Group does not use automated decision-making or profiling that has legal consequences for individuals or similarly significant effects. If automated decision-making or profiling is introduced in the future, it will only be done within GDPR limits and with clear communication to data subjects.

12 - Processing Personal Data for Marketing

12Group may send marketing communications where permitted based on consent or legitimate interest. Marketing messages will only be sent to individuals who have given consent or for whom another lawful basis applies.

You may unsubscribe from marketing communications at any time via the unsubscribe link in emails or by contacting info@12group.nl.

13 - Data Breaches and Incidents

12Group has procedures to identify, assess, and report data breaches and security incidents. In case of a data breach, 12Group will comply with statutory notification obligations and, if necessary, inform affected individuals and the Dutch Data Protection Authority.

14 - Transfers Outside the EU/EEA

If personal data is transferred or processed outside the EU/EEA, 12Group ensures appropriate safeguards such as:

- Standard contractual clauses
- Processor privacy statements with adequate safeguards
- Other mechanisms recognized by the Dutch Data Protection Authority

15 - Changes to this Privacy Statement

12Group may amend this privacy statement. Changes will be published on this page and take effect from the publication date. It is the user's responsibility to review the privacy statement regularly.

16 - Contact

For questions regarding this privacy statement, please contact:

12Group

Email: info@12group.nl