

PRIVACY STATEMENT SPOTS

Introduction

SPOTS takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at info@spots.today.

Who is SPOTS?

SPOTS is the besloten vennootschap SPOTS, with registered office at (9711 LD) Groningen listed at the Traderegister of the Dutch Chamber of Commerce under 74204742.

SPOTS is as the controller ultimately responsible with regard to the processing of your personal data.

SPOTS has appointed a data protection officer. You may contact Kevin Delgado at kevin@spots.today.

How does SPOTS use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data SPOTS uses for that specific purpose, the legal justification, and the amount of time SPOTS keeps this data. For clarity's sake, we have categorised the purposes.

Services, customer management and financial administration

Purpose:	Financial administration
Information:	Company name, Billing address, Bank details
Legal basis:	Legal obligation
Storage period:	As long as necessary for this purpose

Purpose:	Invoicing
Information:	Company name, Billing address, Bank details
Legal basis:	Legal obligation
Storage period:	As long as necessary for this purpose

Purpose:	Services
Information:	Email
Legal basis:	Necessary for the performance of a contract
Storage period:	As long as necessary for this purpose

Purpose:	CRM
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Information: Name, Email, Location, Order history, Social media account, Phone, Profile photo
Legal basis: Legitimate interests
importance: Commercial interests
Storage period: As long as necessary for this purpose

Marketing

Purpose: Newsletter
Information: Email Legitimate interests
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: Retargeting
Information: Email Legitimate interests
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: Social media marketing
Information: Email Legitimate interests
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: Behavioural targeting
Information: Email Legitimate interests
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Website

Purpose: Website analytics
Information: Online behaviour, Location
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: A/B testing
Information: Online behaviour, Location
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: Account
Information: Name, Email, Message content
Legal basis: Necessary for the performance of a contract

Storage period:	As long as necessary for this purpose
Purpose:	Submitting reviews or messages
Information:	Name, Email, Message content
Legal basis:	Necessary for the performance of a contract
Storage period:	As long as necessary for this purpose

How did SPOTS obtain your personal data?

SPOTS has obtained your data because you have provided this data to us.

What are your rights?

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

Access

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data SPOTS has obtained about you, you may exercise your right of access by submitting a request to SPOTS.

Making changes

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that SPOTS makes these changes for you. You may request that SPOTS modifies, corrects, supplements, erases or shields your information.

Restriction of processing of personal data

You also have the right, under certain conditions, to ask SPOTS to restrict the processing of your personal data.

Right to object

If processing of your data takes place on the grounds of 'legitimate interest' by SPOTS or a third party, you have the right to object to that processing.

Portability of data

You have the right to obtain your personal data from SPOTS. SPOTS will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

Withdrawing consent

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in SPOTS no longer being able to provide you with certain services.

Response from SPOTS

A request can be sent to info@spots.today. SPOTS will comply with your request as soon as possible and in any case no later than one (1) month after SPOTS has received such a request. If SPOTS rejects your request, we will indicate in our reply why the request was rejected.

Recipients of your personal data

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfilment of an agreement between you and SPOTS

It is possible that SPOTS is required to submit your data to a third party, for example to fulfil a legal obligation.

What are cookies and how does SPOTS use them?

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of SPOTS and then stored on the hard disk or in the memory of your device. The cookies placed via SPOTS's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

Can changes be made to this Privacy Statement?

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

Questions, remarks, and complaints

If you have any questions regarding this Privacy Statement or the way in which SPOTS uses your data, you can send an e-mail to info@spots.today. If you have a complaint about the way your data is processed, please send an e-mail to info@spots.today. Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the [Autoriteit Persoonsgegevens](#).