

Privacy statement

The background of the entire page is dark blue. It is decorated with several patterns of small white squares. In the top right corner, there is a curved pattern of squares. In the bottom left corner, there is a semi-circular pattern of squares. In the bottom right corner, there is a semi-circular pattern of squares that partially overlaps a white rectangular box.

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Scope privacy statement

1. INTRODUCTION

- 1.1 Scope products and services are offered to you by Scope (hereinafter: "Scope"), located at Spicalaan 1-59, 2132 JG Hoofddorp, and registered with the Chamber of Commerce under number 34063903.
- 1.2 Scope can be reached at the address listed above, as well as by email (privacy@scope.nl)
- 1.3 This statement is intended to inform you about the processing of your personal data in connection with your use of Scope products and services and in connection with your communication with Scope.
- 1.4 In most cases, the data controller is not Scope itself but Scope's client, unless Scope itself determines the purpose and means of processing personal data. If you have any questions or wish to exercise your rights, please contact the data controller first.

2. CATEGORIES OF PERSONAL DATA

- 2.1 We process at least the following categories of personal data:
 - 2.1.1 First and last names
 - 2.1.2 Aliases
 - 2.1.3 Gender
 - 2.1.4 Date of birth
 - 2.1.5 Place of birth
 - 2.1.6 Nationality
 - 2.1.7 Address(es)
 - 2.1.8 Country of residence
 - 2.1.9 Document number (passport, ID card, or driver's license)
 - 2.1.10 Personal identification number
 - 2.1.11 Expiration date of identification document
 - 2.1.12 Date of issuance of ID card
 - 2.1.13 Insolvency information
 - 2.1.14 Status and status history regarding sanctions, PEP, and similar lists
 - 2.1.15 Disqualification as a director
 - 2.1.16 Information regarding law enforcement and financial involvement
 - 2.1.17 Existence of negative media coverage
 - 2.1.18 Email address
 - 2.1.19 User's phone number (optional, for 2FA)
 - 2.1.20 User's name (optional)
 - 2.1.21 Financial information (optional)
 - 2.1.22 UBO identification (ownership/control relationship)
 - 2.1.23 Company information (activities)
 - 2.1.24 Information about employer(s) (optional)
 - 2.1.25 Location data if you visit our websites or use our services.
- 2.2 We may process personal data regarding the following categories of data subjects:
 - 2.2.1 Users of Scope products and services
 - 2.2.2 (Potential) clients of Scope's clients
 - 2.2.3 Employees of (clients of) Scope's clients

- 2.2.4 The data subject who is directly or indirectly the subject of an investigation under the AML conducted using Scope products and services on behalf of a data controller.

3. PURPOSES OF PERSONAL DATA PROCESSING

- 3.1 When we act as the data controller, we process your contact information to stay in touch with you, answer your questions, fulfill our agreements with you, and enforce our terms and conditions regarding the use of our products and services.
- 3.2 If you have subscribed to receive them, we also use your email address to send you updates such as newsletters, announcements, and information about new features.
- 3.3 Other purposes for which Scope acts as a processor are determined by the data controller; these purposes typically include the processing of personal data in connection with a legal obligation under the Anti-Money Laundering and Counter-Terrorist Financing Act (AML) when using Scope products and services.

4. LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

- 4.1 The legal basis for processing operations in which Scope is the data controller is generally the performance of a contract with the data subject or Scope's legitimate interests, unless a data subject has successfully exercised his or her right to object to such processing.
- 4.2 The legal basis for the processing of personal data in which Scope acts as a processor will generally be that the processing is necessary to comply with a legal obligation incumbent on the data controller, in particular under the Money Laundering and Terrorist Financing (Prevention) Act (AML) and related laws and regulations. It is also possible that the processing will be necessary for the performance of a task carried out in the public interest or in the exercise of official authority. Among other things, with regard to data subjects whose (professional) personal data are processed because they are or have been employees, processing may be necessary for the performance of an (employment) contract to which the data subject is a party. Finally, processing may be necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Under the GDPR, the data subject has the right to object.
- 4.3 Voor het gebruik van uw locatie en het sturen van de nieuwsbrief is de grondslag uw toestemming, dat we uw vragen vóór dit gebruik. De verstrekking van uw persoonsgegevens is niet wettelijke verplicht, bij het niet verstrekken van de gegevens kunnen echter sommige diensten en functionaliteiten niet of niet optimaal worden geboden.

5. COOKIES

- 5.1 On our websites and/or apps, we use technologies that can read information from your device or store information on your device (hereinafter: "cookies").
- 5.2 For example, we use cookies to track statistics on the number of visitors to the Websites and Apps, and which pages are viewed most frequently. We use a Google cookie to track statistics as part of the "Analytics" service. This includes, for example, statistical information about the number of visitors, the most visited pages, and the duration of visits. Google stores this information on servers in the EU/EEA.

- 5.3 We may also share this usage behavior with advertising networks. The advertising networks combine this usage behavior with similar information they obtain from your visits to other websites on which they advertise. Based on this, an interest profile is created for you so that relevant advertisements tailored to this interest profile can be displayed to you on other websites.
- 5.4 You can delete cookies stored in your browser and disable the acceptance of (certain) new cookies. The following links provide more information on how to configure these settings in various web browsers: [Chrome](#) [Microsoft Edge](#) [Firefox](#) [Safari](#).
- 5.5 For more information about cookies, please refer to our cookie policy here: <https://cddondemand.com/cookie-statement/>.

6. RETENTION PERIODS

- 6.1 Scope will not retain your personal data for longer than is necessary for the purposes for which such personal data is processed.
- 6.2 Notwithstanding the first paragraph, your personal data will be retained for a longer period to the extent necessary to comply with legal obligations, such as, but not limited to, tax retention periods.

7. THIRD-PARTY SERVICE PROVIDERS

- 7.1 Scope uses third-party service providers to host your personal data and to carry out the processing activities described under "Cookies." Third-party service providers may receive and process your personal data to the extent necessary to perform their tasks on our behalf.

8. YOUR RIGHTS

- 8.1 You have the right to request that the data controller grant you access to, correct, delete, or restrict the processing of your personal data, or to object to the processing based on legitimate interests. In addition, you have the right to data portability under certain circumstances.
- 8.2 You also have the right to file a complaint with the Dutch Data Protection Authority.
- 8.3 You have the right to withdraw any consent you may have given for the processing of personal data at any time. This does not affect the lawfulness of processing based on consent that took place prior to such withdrawal. Withdrawal of your consent may result in certain services no longer being provided.
- 8.4 Exercise your rights by contacting the data controller. If Scope is not the data controller itself, Scope will forward any requests to the data controller.
- 8.5 Data Protection Officer SCOPE marketing technology B.V. has appointed a Data Protection Officer (DPO). For questions regarding the processing of your personal data or the exercise of your rights, you can contact the DPO at mbverhoef@consignium.nl or by mail: Larikslaan 14, 3833 AM Leusden.

9. CHANGES

- 9.1 We may amend this privacy statement. We publish the most recent version of this statement online.