

# PRIVACY POLICY VAN PASSE B.V.

Located at Ellermanstraat 12, 1114 AK Amsterdam, Netherlands

Registered with the Chamber of Commerce under number 94604835

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Van Passe BV (hereinafter: “we,” “us,” or “our”) offers bookkeeping services as an accounting firm. This includes processing and maintaining financial administration, preparing and filing VAT returns, preparing income tax returns, conducting personal consultations, and providing advice on accounting and administrative matters.

Visitors to our website ([www.vanpasse.nl](http://www.vanpasse.nl)) can contact us and inquire about our services via the email addresses listed on our website or schedule an appointment through the online calendar. In the course of providing our services and the functionalities on our website, we process personal data of our clients and website visitors (hereinafter: “you,” “your”), as well as of any contractors, clients, and employees.

This privacy policy contains information about our policy regarding the processing (collection, storage, use, sharing, and disclosure) of your personal data by Van Passe BV, for example, when you visit our website, contact us, or enter into an agreement with us, and the choices you have regarding the processing of that data by Van Passe BV.

By using our services, you agree to the processing of your personal data in accordance with this policy.

## 1. DEFINITIONS

In this Privacy Policy, the following terms, written with an initial capital letter, shall have the meanings set forth below:

- Personal Data:** All information about an identified or identifiable natural person. This means information either directly about someone or that can be traced back to that person.
- Usage Data:** Automatically collected data that is generated through the use of our website, such as the duration of visits to pages on our website. Usage data is only collected if you consent to cookies.
- Data Controller:** The natural or legal person who (alone, jointly, or in conjunction with others) determines the purposes and means of processing personal data. Under this Privacy Policy, we are the Data Controller of your personal data.
- Data Processors:** The natural or legal persons who process personal data on behalf of Van Passe BV. We may use different Data Processors to process your data to support our services and products.
- Data Subjects:** The Data Subject is any living individual who uses our services and whose personal data is processed by us.

## 2. DATA COLLECTION AND USAGE

We collect various types of data for multiple purposes, such as to communicate with you regarding the execution of agreements, as well as to analyze and improve our services and offerings.

### Personal Data

When you use our services or website, we may ask you to provide certain personally identifiable information. This information may be used to execute an agreement, contact you, or identify you. This personally identifiable information may include, but is not limited to:

Type of Person	Personal Data	Purposes of Processing
Client / Contractor	Full name Preferred name Phone number Email address Residential address Citizen Service Number (BSN) Date of birth, Place of birth Nationality, Gender Marital status Business name Business address Chamber of Commerce (KVK) number VAT identification number Tax number Business bank account number	Contact details such as name, preferred name, phone number, email address, and residential address are used for communication with you as a client, as well as to communicate with government institutions such as the tax authorities.  Additionally, we use this personal data for: <ul style="list-style-type: none"> <li>• Setting up, processing, and maintaining financial business administration</li> <li>• Bank account linking</li> <li>• Compliance checks, PEP sanction checks</li> <li>• Verifying company details</li> <li>• Preparing and filing tax returns</li> <li>• Payroll administration</li> </ul>
Visitor of our website	IP address Name Phone number Email address	The IP address is stored via a cookie to recognize visitors, enhance security, and for administrative purposes.  Name, Phone number, and Email address are processed when you fill in the appointment form on our website to schedule an online meeting.
Your contractors or clients	Name Address Phone number Email address Business name Chamber of Commerce (KVK) number	Invoicing and collection, reference in communication.
Your employees	Full name Phone number Email address Residential address Citizen Service Number (BSN) Date of birth Place of birth Nationality Gender Marital status	Payroll administration.

Potential clients (leads)	Name Phone number	Processed upon first contact via various channels, such as WhatsApp, email or the website, for the purpose of intake and qualification
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### Special and Sensitive Personal Data

We process your Citizen Service Number (BSN) only when we are legally required to do so, for example, in the context of tax returns and payroll administration. We handle the BSN with care and take appropriate measures to prevent unauthorized access.

We process data regarding race or ethnic origin only if necessary and with a valid legal basis, such as your explicit consent or a legal obligation under labor law.

We implement strict security measures to protect this data. This means that only employees who genuinely need access to this special or sensitive personal data (e.g., for payroll administration or tax filings) can access it. Sensitive data is stored encrypted, pseudonymized, or protected.

### Processing of Financial Data

Although financial data, such as bank account numbers, payment details, assets, and debts, fall under general personal data and are not classified as special or sensitive data, we handle your financial data with extreme care. We acknowledge that financial data contains sensitive information and process bank account numbers and payment details exclusively for invoicing, tax filings, and administration. These data will be retained for as long as you are a customer of ours and for 5 years after you cease to be a customer. This retention period is required by law under the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft).

### Usage Data

We may collect data that your browser sends when you visit our website. This Usage Data may include information such as your Internet Protocol address (IP address), your device type, browser type, browser version, the pages you visit on our website, the time and date of your visit, the time spent on those pages, the unique device ID, and other diagnostic data.

When you use our website via a mobile device, this Usage Data may also include information such as the type of mobile device you use, the unique device ID of your mobile device, your mobile IP address, your mobile operating system, the mobile browser you use, the unique device ID, and other diagnostic data.

We use Usage Data for various purposes, including:

- To analyze and collect valuable data that we can use to improve our website and services.
- To detect, prevent, and address technical issues.

### AI Chatbot

Van Passe BV uses an AI-driven assistant for the initial handling of messages via WhatsApp and other communication channels. Personal data shared during this contact is processed via Respond.io. Users are informed where possible that they are communicating with an automated assistant.

### Newsletter

Just like the information we indirectly collect, we may use the Personal Data you provide to send you our newsletter or other marketing communications, such as promotional emails about offers similar to those you have previously purchased or may be interested in. We use your first name, last name, and email address for this purpose. You can unsubscribe from our emails at any time. Follow the unsubscribe instructions included in every email you receive from us.

### Use of Data for Personalized Advertising

In addition to the purposes mentioned above, we may use customer data (such as name, email address, and phone number) to display personalized advertisements through advertising platforms such as Google or Meta (Customer Match). We only do this for customers who have entered into an agreement with us, so that we can provide them and similar audiences with more relevant information.

You can object to this at any time by sending an email to [info@vanpasse.nl](mailto:info@vanpasse.nl). In that case, we will no longer use your data for this purpose.

### **3. LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)**

If you are a resident of the European Economic Area (EEA), the legal basis for collecting and using your Personal Data, as described in this Privacy Policy, depends on the type of Personal Data we collect and the specific context in which we collect it.

We may process your Personal Data because:

- You visit our website, contact us, enter into an agreement with us, or otherwise use our services
- You have given your consent
- The processing is in our legitimate interest and does not override your rights
- We are legally required to do so

### **4. STORAGE AND RETENTION OF DATA**

We will take all reasonable steps to ensure that your Personal Data is processed in accordance with this Privacy Policy.

#### Transfer of Personal Data Outside the European Economic Area (EEA)

In some cases, it may be necessary to transfer your Personal Data to service providers or partners outside the EEA. When this occurs, we ensure that an adequate level of protection is guaranteed, as required by the General Data Protection Regulation (GDPR). This may include:

- An adequacy decision by the European Commission (if applicable);
- The conclusion of standard contractual clauses (Standard Contractual Clauses – SCCs) approved by the European Commission with the relevant party;
- Other appropriate safeguards, such as binding corporate rules or specific contractual agreements.

If you need more information about the measures we take regarding international data transfers, you can contact us at [info@vanpasse.nl](mailto:info@vanpasse.nl).

We retain your Personal Data for as long as necessary for the purposes described in this Privacy Policy. We store and use your Personal Data only to comply with our legal obligations (e.g., if we are required to retain certain data for compliance with applicable laws), resolve disputes, and enforce our legal agreements or policies.

We retain your Usage Data only for internal analytical purposes. Usage Data is stored in an anonymized format whenever possible, unless we are legally required to store this data non-anonymously.

All Personal Data is deleted once it is no longer necessary for the purposes for which it was processed, unless we are legally required to retain it for a longer period.

### **5. DISCLOSURE OF DATA**

#### Disclosure for Law Enforcement Purposes

In certain circumstances, we may be required to disclose your Personal Data, for example, if we are legally obligated to do so or upon request from government authorities (e.g., a court or regulatory body).

#### Legal Requirements

We may disclose your Personal Data if, in good faith, we believe that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights and property of Van Passe B.V.
- Prevent or investigate potential misconduct in connection with our website or services
- Protect the personal safety of website visitors, our clients, or the public
- Protect against legal liability

## 6. DATA SECURITY

The security of your Personal Data is important to us. However, we want to emphasize that no method of transmission over the internet or electronic storage is 100% secure. While we strive to use commercially acceptable measures to protect your Personal Data, we cannot guarantee absolute security.

## 7. YOUR RIGHTS REGARDING DATA PROTECTION UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain rights regarding data protection. We strive to take reasonable measures to enable you to correct, modify, delete, or restrict the use of your Personal Data.

If you want to know which Personal Data we process about you or if you want certain Personal Data to be deleted from our systems, you can contact us.

You have the following legal rights regarding data protection:

- The right to access, modify, or delete the Personal Data we process about you. Where possible, you have access to your Personal Data and can modify or delete it directly within your account settings. If you are unable to perform these actions yourself, you can contact us for assistance.
- The right to rectification. You have the right to correct any information that is inaccurate or incomplete.
- The right to object. You have the right to object to the processing of your Personal Data.
- The right to restriction. You have the right to request a restriction on the processing of your Personal Data.
- The right to data portability. You have the right to receive a copy of the information we process about you in a structured, machine-readable, and commonly used format.
- The right to withdraw your consent. You also have the right to withdraw your consent at any time if we process your Personal Data based on your consent.

To protect your privacy, we may ask you to verify your identity before complying with such requests.

You also have the right to file a complaint with the Data Protection Authority regarding our collection and use of your Personal Data. For more information, please contact the Data Protection Authority.

## 8. SHARING PERSONAL DATA

As part of our business activities, we engage external companies to execute agreements we have with you, to process your Personal Data (if necessary), or to assist in analyzing how our services and website are used or can be improved.

With all Data Processors we engage and with whom your Personal Data is shared, we have entered into data processing agreements. Van Passe B.V. remains responsible for the processing of Personal Data that these Data Processors handle. These Data Processors only have access to your Personal Data to perform these tasks on our behalf and are not permitted to disclose them to others or use them for other purposes:

Data Processor	Purpose
Docusign	Creating, signing, and managing documents and contracts
WhatsApp	Customer service and business communication
Salesforce	CRM management and customer relationship management
Pipedrive	CRM management and customer relationship management
OneDrive	Storage and backup of documents and data
Make	Automating workflows and integrating applications

Zapier	Connecting and automating data flows between applications
MailChimp	Email marketing and customer communication
Voys	Business telephony and communication
MoneyMonk	Accounting and invoicing
Microsoft Teams	Online meetings and internal communication
Calendly	Online appointment scheduling and calendar integration
Wordpress	Website management and content publication
Webhost (Hostinger)	Web hosting and mail server (our mail server is on Microsoft, hosting with Hostinger)
OpenAI	Automating customer communication and AI-supported interactions
Claude (Anthropic)	AI-supported text processing, content creation and internal automation
Logius	Access to verification via government services (e.g., DigiD, eHerkenning)
Visma Nmbros	Payroll administration and HR processing
Timelines	Customer service and business communication via WhatsApp.
Respond.io	Management of customer communication via WhatsApp and other messaging channels, including AI-driven intake and lead processing
Teams Telephony	Business telephony via Microsoft Teams, including incoming and outgoing calls, voicemail, and call groups.
Other Service Providers	When Van Passe BV engages external specialists or business service providers to support the provision of services, personal data may only be shared to the extent necessary for the execution of the agreement and subject to appropriate contractual and organisational safeguards

We do not sell your Personal Data to third parties.

#### Business Transactions

If Van Passe B.V. is involved in a merger, acquisition, or sale of assets, your Personal Data may be transferred. We will inform you before your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **9. SOCIAL MEDIA AND LINKS TO OTHER SITES**

#### Use of social media buttons

On our website, we use social media buttons that allow you to share content or visit our company pages on social networks. When you click on these buttons, the respective social network may collect personal data, such as your IP address and information about the page you are visiting.

We have no control over how these social networks handle the collected data. For more information on how your personal data is processed by these networks, please refer to the privacy policies of the respective platforms:

- Facebook – <https://www.facebook.com/privacy/explanation>
- LinkedIn – <https://www.linkedin.com/legal/privacy-policy>
- Instagram – <https://help.instagram.com/519522125107875>
- Twitter/X – <https://twitter.com/en/privacy>

If you do not want these networks to collect data about you, we recommend that you stay logged out of these services before visiting our website or limit the use of tracking cookies via your browser settings.

#### Links to other websites

Our website may contain hyperlinks to third-party websites. We are not responsible for how these third parties handle your data. Please review the privacy policy, if available, of the website you are visiting.

#### **10. CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy at any time. We will inform you of any changes by publishing the new Privacy Policy on our website.

#### **11. CONTACT US**

If you have any questions about this Privacy Policy or wish to exercise your rights, you can contact us via the contact form on our website, by phone at 085 – 11 55 065, or via email at [info@vanpasse.nl](mailto:info@vanpasse.nl).