

## Privacy Policy

### 1. Introduction

Kelson Marketing & Content's (henceforth be known as "Kelson") mission is to support organizations within the shipping and transport sector to fully exploit the marketing potential and to contribute to a more progressive sector. We do this by helping B2B organizations to develop an (online) marketing strategy and take responsibility for their implementation. Quality, flexibility and custom solutions: this is what Kelson stands for. The client is the key focus of our operating company. That's why the privacy and security of our visitors is of paramount importance. Kelson is committed to protecting the data you share with us. This privacy policy explains how Kelson processes information that can be used to directly or indirectly identify an individual ("Personal Data") collected through use of its website and services.

Any information stored by Kelson is treated as confidential. All information is stored securely and is accessed by authorized personnel only. Kelson implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use.

### 2. Collection and use

#### 2.1 General

If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. You can withdraw your consent at any given time.

Kelson may collect data that you actively provide, such as when you register for events, use our services, contact us or sign up for information and newsletters. We will process your first and last name, your email address and phone number and any additional info provide by you. Please note that we will only send you information if you have opted in for this. You can withdraw your consent at any given time.

#### 2.2.1 Purpose of processing personal data

Kelson uses your personal information in a number of ways to offer you the expected service. As written below in more detail. We will collect your consent prior to processing your data where required by applicable law.

**Administration:** We use your personal information to administer programs in which you participate, including providing you with access to your account information, such as rewards status and offers for which you are eligible.

**Marketing:** Where permitted we may use your personal information to provide or offer you newsletters, promotions and featured specials, as well as other marketing messages in accordance with any communications preferences you have expressed. We use your information to send you marketing messages. We may provide these communications via email, postal mail, online advertising, social media, telephone and text message (including SMS and MMS). With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our website.

**Service Improvements:** We may use your personal information to improve our services and to ensure that our site, products, and services are of interest to you.

We use the collected data to communicate with you, to update you or to provide requested services. Those purposes are based on our legitimate interests, the performance of a contract or your consent. Your consent can be withdrawn at any given time.

Your data will be stored no longer than is necessary for the purposes for which the personal data are processed. This means that we delete the data after the expiration of the retention of official authorities, unless there are circumstances that justify a period of a longer extent.

#### 2.2.2 Sharing personal data

Kelson may also share such information with service vendors or contractors in order to provide a requested service or transaction. We will only share information with such parties if they can guarantee the safety of your data. If needed we will use contracts that ensure that processing is in accordance with the highest security regulations.

**Service Providers:** We rely on third parties to provide services and products on our behalf and may share your personal information with them as appropriate. Generally, our service providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law. However, our fraud detection service providers may use, but not share, your personal information for fraud detection purposes. We may use service providers to communicate news and deliver promotional and transactional materials to you on our behalf, including personalized online and mobile advertising in accordance with your preferences and applicable law. Kelson will only work with parties that offer a method to opt-out of such advertising.

**Transactions:** As we develop our business, we might sell, buy, restructure or reorganize businesses or assets that is currently part of our portfolio. In such circumstances, we may transfer or assign information collected, including, without limitation, other information and personal information, to one or more affiliated or unaffiliated third parties in connection with these business transactions. To the extent that the law require it, we will provide notice of our intent to transfer personal data to a third party for this purpose, and explain how you can object to such transfer.

In addition, Kelson may disclose personal information in order to: (i) comply with applicable laws, (ii) respond to governmental inquiries or requests from public authorities, (iii) comply with valid legal process, (iv) protect the rights, privacy, safety or property of Kelson, site visitors, employees or the public, (v) permit us to pursue available remedies or limit the damages that we may sustain, (vi) enforce our websites' terms and conditions, and (vii) respond to an emergency.

#### 2.2.3 Links to other sites

Please be aware that while visiting our site, visitors can follow links to other sites that are beyond our sphere of influence. Kelson is not responsible for the content or privacy policy of these other sites.

### 3. Cookies

When you visit and interact with Kelson's website, we collect other information that does not directly identify you about your use of the site, such as a catalog of the site pages you visit, and the number of visits to our site. We use this information, as well as data received from third parties, to deliver you email, online (on our site) and mobile advertisements.

We use cookies and other technologies (such as "Google Analytics") to collect this information. If you want to remove or block cookies from your device at any time, you can update your browser settings (consult your browser's "help" menu to learn how to remove or block cookies).

We may use information we have collected and aggregated, or anonymized personal information received from third parties, to understand more about our users. This includes demographic data, such as date of birth, gender and marital status, inferred commercial interests, such as favorite products or hobbies, and other information we may collect from you or from third parties.

Because this information does not personally identify you, such information may be disclosed for any purpose where permitted by law.

#### **4. Sensitive information**

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations.

#### **5. Children**

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

#### **6. Controller**

Kelson processes Personal Data both as a Processor and as a Controller, as defined in the GDPR.

Kelson adheres to the GDPR from May 25th, 2018. Complaints about the processing of your data can be submitted to the supervisory authority in your country.

All data collected by Kelson will be stored in secure hosting facilities provided by ViewonIT. Kelson its contract with her hosting provider ensures that all hosting is performed in accordance with the highest security regulations.

#### **7. Change of Privacy Policy**

We presume that you have carefully read this document. We reserve the right to change our privacy policy as necessity dictates. This privacy policy is an integral part of Kelson's terms of use.

#### **8. Our Legal Obligation to Disclose Personal Information**

We will reveal your personal information without your prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to Kelson. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

#### **9. Your rights**

You have the right to inquire about your Personal Data, but you can also ask us to erase or change your data. Send us your request by email or by letter, accompanied with a copy of your passport or ID. Please shield the photo and the identifying number on your passport or ID. We will handle your request within four weeks.

#### **10. For Further Information**

If you have any further questions regarding the data Kelson collects, or how we use it, then please feel free to contact us by email at: [marketing@kelson.nl](mailto:marketing@kelson.nl).

