Rijngard Privacy Statement

> Version 1.0, November 2026. This statement explains how Rijngard collects, uses and protects personal data. This is an English translation. The Dutch text prevails.

1. Who we are

Rijngard ("Rijngard", "we", "us") is a sole proprietorship (eenmanszaak) established in Breukelen, the Netherlands, registered with the Netherlands Chamber of Commerce (KvK) under number 42052160. Rijngard sells hardware and reports to businesses and provides market research and marketing and sales advice.

Rijngard is the controller under the General Data Protection Regulation (GDPR) for the processing described in this statement. For any privacy question, email info@rijngard.com or call +31 6 8384 6656.

2. What data we process and why

We process personal data only for a specific purpose and on a legal basis the GDPR allows. For Rijngard these are usually our legitimate interest, the performance of an agreement and compliance with a legal obligation. We rely on legitimate interest only where our interest outweighs your privacy interest. Contact us if you want to know how we weighed this in a specific case.

Whose data	Personal data	Purpose	Legal basis
People who contact us by contact form, email or phone	Name, company, job title if given, email address, phone number if given, content of the message	Answering your enquiry and following up on it	Steps at your request before a possible agreement (Art. 6(1)(b)) and our legitimate interest in answering business enquiries (Art. 6(1)(f))
Business contacts we approach	Name, job title, company, business email address, business phone number, notes of our contact	Introducing Rijngard's products and services, keeping track of our conversations	Our legitimate interest in business-to-business outreach (Art. 6(1)(f))
Contact persons at customers	Name, job title, company, business contact details, delivery and invoice addresses, quotations, orders, invoices, warranty and support correspondence	Quotations, delivery of products and services, invoicing, warranty claims, support, administration	Our legitimate interest in performing the agreement with your organisation (Art. 6(1)(f)) and our legal obligation to keep records (Art. 6(1)(c)). If you contract with us yourself: performance of the agreement (Art. 6(1)(b))

Whose data	Personal data	Purpose	Legal basis
Contact persons and users in a trial	Name, job title, company, business contact details, equipment and serial numbers loaned, handover and return records, evaluation feedback	Arranging and following up the trial, recovering the equipment	Our legitimate interest in performing the trial agreement with your organisation (Art. 6(1)(f))
Contact persons at suppliers and partners	Name, job title, company, business contact details, correspondence, orders	Purchasing, cooperation, administration	Our legitimate interest in working with your organisation (Art. 6(1)(f)) and our legal obligation to keep records (Art. 6(1)(c))
Website visitors	See section 12	Running and securing the website, measuring how it is used	Our legitimate interest in a working, secure website and in knowing how it is used (Art. 6(1)(f))

Giving us your data is voluntary. Without contact details we cannot reply to you or perform an agreement. If a law or an agreement requires certain data, we tell you at the time and explain what happens if you do not provide it.

3. Where we get your data

- **From you.** When you contact us, meet us, place an order or take part in a trial.
- **From your organisation.** For example when a colleague names you as contact person for an order, a delivery or a trial.
- **From public and professional sources.** When we approach a business contact, we collect business contact details from LinkedIn, company websites and contacts at trade events.

4. Manufacturer apps and online platforms

Some products we sell work with apps or online platforms of the manufacturer. The data in those apps and platforms is processed by the manufacturer and by the organisation that uses the products, under the manufacturer's privacy policy, not under this statement. Read the manufacturer's privacy policy before you use its app or platform. For trials, Rijngard has access to the trial accounts on the manufacturer's platform. We use that access only to set up, support and close the trial, including removing users and their data when the trial ends. Rijngard has no access to customers' own accounts.

5. Who receives your data

Rijngard does not sell personal data. We share it only where this is needed, and only the data the recipient needs.

Service providers that process data on our behalf. They may use your data only on our instructions and under their data processing terms.

- **Microsoft (Microsoft 365):** email
- **Lovable:** website platform, contact form and website statistics
- **Cloudflare:** domain name, DNS and website delivery

Manufacturers. When needed for an order, a delivery, a warranty claim or a support case, we share the name, company and business contact details of the contact person, and the delivery address, with the manufacturer of the product concerned. Some manufacturers are located outside the EEA (see section 6).

Our accountant. Receives our administration, including quotations, orders and invoices, for our bookkeeping and tax obligations.

PostNL. When we ship products, PostNL receives the name and delivery address needed for delivery.

Authorities. When the law requires it, for example the tax authorities, a court or the police.

A successor to our business. If Rijngard's business is transferred, for example to a private limited company (B.V.), your data passes to the new owner. The new owner then processes it in line with this statement.

6. Transfers outside the European Economic Area

Some service providers or manufacturers are located outside the European Economic Area (EEA), for example in the United States, or use subcontractors there. We allow a transfer of personal data outside the EEA only when:

- the European Commission has decided that the country, or the part of it concerned, ensures an adequate level of protection, such as the EU-US Data Privacy Framework for certified US companies, or
- we have agreed the European Commission's Standard Contractual Clauses with the recipient, with additional safeguards where needed.

Contact us if you want to know which safeguard applies to a specific transfer.

7. Security

Rijngard takes appropriate technical and organisational measures to protect personal data against loss, unauthorised access, disclosure, alteration and destruction. Access to personal data is limited to people who need it for their work, and they are bound to confidentiality.

8. How long we keep your data

We keep personal data no longer than needed for the purposes in section 2, or than the law requires. After that we delete or anonymise it.

Data	How long we keep it
Enquiries and emails that do not lead to business	24 months after our last contact
Business contacts we approached who did not become customers	24 months after our last contact
Contact persons at customers	For the duration of the business relationship, then 24 months
Trial records	24 months after our last contact
Contact persons at suppliers and partners	For the duration of the business relationship, then 24 months
Quotations, orders, invoices and other administration	7 years, as required by Dutch tax law
Do-not-contact list (name and email address only)	As long as needed to respect your objection

"Last contact" means the most recent email, call or meeting between you and Rijngard. If you object to being contacted, we delete your data without delay and keep only your name and email address on a do-not-contact list, so that we do not approach you again.

9. Your rights

Under the GDPR you have the following rights regarding your personal data.

- **Access.** You can ask for a copy of the data we hold about you, with information on the purposes, the source and the recipients.
- **Rectification.** You can have incorrect or incomplete data corrected.
- **Erasure.** You can ask us to delete your data, for example when we no longer need it, when you have objected to its use, or when it was processed unlawfully. In some cases the law requires us to keep it, for example for tax records.
- **Restriction.** You can ask us to store your data but not use it further, for example while we check a complaint about its accuracy or lawfulness.
- **Data portability.** You can ask us to give data you provided to us in a structured, common, machine-readable format, or to send it to another organisation, where we process it on the basis of an agreement or consent.
- **Objection.** You can object to processing based on our legitimate interest. If you object to business outreach, we always stop. For other processing we stop unless we have compelling legitimate grounds that override your interests, or need the data for a legal claim. In that case we explain our grounds.
- **Withdrawal of consent.** Where we rely on your consent, you can withdraw it at any time. This does not affect processing that took place before the withdrawal.
- **Complaint.** You can file a complaint with the Dutch Data Protection Authority, the Autoriteit Persoonsgegevens, or with the data protection authority in the EU country

where you live or work. We would appreciate the chance to resolve your concern first, so please contact us beforehand.

10. How to use your rights

Send your request to info@rijngard.com or call +31 6 8384 6656. Using your rights is free of charge. If a request is clearly unfounded or excessive, for example because it is repeated, we may charge a reasonable fee or refuse it.

We may ask for information to confirm your identity before we act on a request. We respond without undue delay and within one month of receiving it. For complex or numerous requests we may extend this by two months. In that case we tell you within the first month.

11. Data breaches

If a personal data breach occurs, we report it to the Autoriteit Persoonsgegevens within 72 hours where the GDPR requires this. If the breach is likely to result in a high risk to your rights and freedoms, we inform you without undue delay.

12. Our website and cookies

- Messages you send through the contact form on rijngard.com reach us at info@rijngard.com.
- Cloudflare processes visitors' IP addresses to deliver the website and protect it against attacks.
- The website stores your language choice in your browser.
- The website loads its font from Google Fonts. Your browser then sends your IP address to Google.
- The website uses Lovable's statistics script. It records the pages you visit, what you click, the page you came from and a random session identifier, and sends this to Lovable through our own web address. Lovable receives your IP address with each request. The script itself stores nothing on your device.
- Lovable, which hosts the website, sets a technical cookie named "__dpl". It makes sure that all files of a page come from the same version of the website. It holds the ID of that website version, not an identifier of you, and expires after 24 hours.

13. Changes to this statement

We may update this statement when our processing, the technology we use or the law changes. The current version is always published on rijngard.com, with its version date at the top. If we make material changes, we make this clear on the website. This statement is published in Dutch and English. In case of any difference, the Dutch text prevails.

14. Contact

For questions about this statement or about how Rijngard handles personal data, contact us:

Rijngard, Breukelen, the Netherlands

- Email: info@rijngard.com
- Phone: +31 6 8384 6656
- Website: rijngard.com
- KvK: 42052160
- VAT ID: NL005458570B48