



## **PRIVACY STATEMENT BRIGHTSTORMING**

This is the privacy statement of Brightstorming, a trade name of the general partnership company "HatRabbits", registered at the Chamber of Commerce under number 59534281, trading from the address Gustoweg 45 H, 3029 AR in Rotterdam.

### **Definitions**

#### Brightstorming

Trade name of HatRabbits, a general partnership company, registered at the Chamber of Commerce under number 59534281;

#### Customer/User:

The natural or legal person who has signed up for the Services of Brightstorming, or has signed up for the newsletter of Brightstorming, or who has visited the Website(s);

#### The Service / Service(s):

The Service containing the provision and maintenance of a web application through which the Customer/User can hold brainstorming sessions, whether or not guided by a facilitator;

#### Personal Data:

Every detail pertaining to an identified or identifiable natural person;

#### Website(s):

The websites [www.brightstorming.com](http://www.brightstorming.com) / [www.brightstorming.nl](http://www.brightstorming.nl);

## **Use of our services**

This privacy policy applies to the processing of (Personal) Data of the Customer/User via the Websites [www.brightstorming.com](http://www.brightstorming.com) / [www.brightstorming.nl](http://www.brightstorming.nl), as well as for using the services of Brightstorming. This privacy policy also applies when the Customer/User registers for the newsletter.

Under the GDPR, Brightstorming is designated as controller. That is why the Customer/User can find in this privacy statement which (Personal) Data Brightstorming processes and what Brightstorming does with this (personal) data.

The (Personal) Data and the associated privacy are collected, processed and, if necessary, kept with the utmost care.

## **Purpose of the data processing**

When the Customer/User purchases services from Brightstorming, Brightstorming will ask the Customer/User to provide (Personal) Data. This Data is stored in the customer system of Brightstorming and used to deliver the Services to the Customer/User.

The (Personal) Data can be used by Brightstorming to inform the Customer/User about the Services. Brightstorming will only do so when the Customer/User has explicitly given permission for this. The Customer/User may at any time stop receiving mailings using the method specified in the particular mailing.

The (Personal) Data will only be used by Brightstorming. Brightstorming does not provide the (Personal) Data to third parties without the permission of the Customer/User, unless Brightstorming is obliged to do so on a legal basis or a court order, or if this is necessary for the execution of an agreement between the Customer/User and Brightstorming.

### **The (personal) data**

The (Personal) Data that Brightstorming collects / processes depends on the type of registration / type of Service of the Customer/User.

When the Customer/User registers for a demo, the following information must be entered via the registration form on the Website:

- First and last name;
- Company Name;
- Phone number;
- E-mail address;

When Brightstorming gives the Customer/User an account for a trial period, Brightstorming collects and processes the following Data:

- First and last name;
- E-mail address;
- Company name (only when the Customer/User is an organization);
- Telephone number (only when the Customer/User is an organization);
- Usage data, including the number of sessions performed by the Customer/User per unit of time and the chosen setup for each generated session.

If an organization is already Customer/User at Brightstorming, new users can be added for the organization in question. This can take place via the Website(s). For this, Brightstorming collects and processes the following Data:

- First and last name;
- E-mail address;
- Usage data, including the number of sessions performed by the Customer/User per unit of time and the chosen setup for each generated session.

Brightstorming also stores the e-mail address of everyone who registers via the Website for the Brightstorming newsletter.

### **What does Brightstorming do with this Data?**

All above mentioned (Personal) Data is used to provide or improve the Product(s)/Service(s) of the Customer/User. The Data can, for example, be used to better structure the Service to the personal wishes of the Customer/User. Brightstorming can also use Data to provide new Service(s), to develop products or to communicate with the Customer/User.

In addition to the above situations, Brightstorming can also share (Personal) Data when necessary:

- In a legal procedure;
- to protect Brightstorming's legal rights;
- to enforce acceptance of our Terms and Conditions in case of security issues, or when the Customer/User is suspected of carrying out fraudulent activities.

### **The GDPR principles**

Brightstorming processes (Personal) Data on the basis of the following principles:

#### Principle 1 – Consent

Brightstorming requests permission from the Customer/User for the use of the (Personal) Data. Brightstorming requests this permission by having the Customer/User fill in some fields designated for that purpose before the Customer/User registers for the relevant Products / Services.

## Principle 2 – Necessary for the execution of an agreement

Brightstorming processes (Personal) Data because this is necessary for the execution of the agreement concluded with Customer/User. The purpose of the agreement is not to process the (Personal) Data, but has a different purpose, namely providing the Services. The Customer/User has the possibility to view, change or delete the (Personal) Data at any time. There will be more information about this below.

### **The retention periods**

Brightstorming complies with the retention periods that are set for the processing of the (Personal) Data. Brightstorming keeps the (Personal) Data for as long as this is necessary for the performance of the service, but no longer than 3 years after the completion of the relevant Services.

The (Personal) Data will only be stored if the chosen Products/Services require this. The (Personal) Data provided by the Customer/User can at all times be viewed or changed by the Customer/User.

### **The register of processing activities**

Brightstorming has drawn up a register of processing activities.

### **The security measures**

Brightstorming has taken various security measures to protect the (Personal) Data. For example, Brightstorming uses secured computers and a secured server.

## **The rights of the Customer /User**

Under the GDPR the Customer/User has the following rights:

- Right of access;
- Right to rectification and supplementation;
- Right to oblivion;
- Right to limit processing;
- Right of objection

Brightstorming has drawn up a procedure in case the Customer/User requests to exercise a right accruing to the Customer/User. If the Customer/User wants to use one of the rights mentioned above, the Customer/User can indicate this by sending an email to [support@brightstorming.com](mailto:support@brightstorming.com). Brightstorming will respond within no more than 14 days.

## **Cookies**

General Data is stored on the Brightstorming Website(s). Brightstorming does this for statistical purposes, to make Customer/User use of the Website(s) as straightforward as possible. Brightstorming makes this Data as anonymous as possible and this Data is not forwarded to third parties.

Brightstorming's Websites uses Google Analytics to track how our Websites are used. The resulting information is stored on Google's own servers via the use of cookies. Google may also transfer this information to third parties where Google is legally required to do so, or where third parties process this information on Google's behalf. Brightstorming has no influence as regards these circumstances and is not liable for any damage resulting thereof.

By using the Brightstorming Website(s), the Customer/User consents to the processing of information by Google in the abovementioned manner and purposes.

Should Brightstorming add links to third party content in its Service, Brightstorming has no influence as regards the content of these third-party sites. Brightstorming is not liable for the content of third party websites. These third parties use a different privacy policy to that of Brightstorming.

### **Contacting Brightstorming**

Should the Customer/User have any questions relating to Brightstorming's privacy policy, the Customer/User may send an email to: [info@brightstorming.com](mailto:info@brightstorming.com). Should the Customer/User wish to ask for information regarding which of their (Personal) Data Brightstorming has stored, the Customer/User may ask for an overview of this (Personal) Data by sending an email to: [support@brightstorming.com](mailto:support@brightstorming.com).

### **Adjustments**

This privacy policy is applicable on all the Services of Brightstorming and the Website of Brightstorming. Brightstorming reserves the right to make changes to its privacy policy at any time. The Customer/User can find the most recent version on the Brightstorming Website(s).

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