

Pay attention:

- The AVG only applies to living natural persons. However, on average people think that companies should also handle data from deceased persons with care. In my opinion, you should incorporate this principle into your privacy statement as much as possible.
- The problem is that this should not be too much. You process health data about deceased persons. The processing of health data (special personal data) is subject to very strict requirements. This is expensive and puts great pressure on the organization (technical, organizational, process-based). You must therefore indicate that you process the data of living people carefully and that you also use the data of deceased persons as much as possible.
- From our telephone consultation I understood that you are not processing any special personal data of living people. Medical and special personal details will only be provided after death.
- I have transferred everything made blue in your own version to the version below.
- Of course you don't have to use this but it gives you an overview of what it should contain.
- Basically this is a simple privacy statement since you only process a limited amount of data from living natural persons.
- If you are going to process medical data from living persons (so also a question such as: "are you in good health yes / no") then you should look at this very carefully from the privacy aspect.
- You can only process a social security number with a legal basis. If this is missing, it is wise to make this black and not to process it.
- A copy of an ID proof may not, in principle, be processed unless.... For the time being it is wise to make the photo and the BSN number black. A process adjustment is actually desirable (as you already suggested) whereby you receive a copy of the ID of the next of kin if the person has already died to comply with the legal obligations.
- I can imagine that you want to elaborate further on how carefully you handle the personal data of the deceased person. Since this is going to be personal data, this leads to confusion (see above). I would therefore further elaborate this in a separate heading. This is of course allowed in the privacy statement, I suggest that you put this at the bottom.
- You can also take a look at point 5 of the statement below regarding the goals. The crossed-out sections belong, for example, to the above part of the deceased person.

Privacy declaration

1. RISE Labs BV and personal data

In this privacy statement, RISE Labs BV (hereinafter: RISE Labs) describes how they will treat your personal data with the aim of being able to offer high-quality and safe products and services and customers and interested parties. When performing its activities, RISE Labs is responsible for processing personal data as stated in this privacy statement

2. What is personal data?

All information about an identified or identifiable natural living person is personal data in accordance with applicable privacy legislation.

3. Data from deceased persons?

RISE Labs also processes data from the deceased. The AVG does not apply to this data and is therefore not covered by this Privacy Statement. RISE Labs, however, will exercise the same degree of care when processing data relating to deceased persons. RISE Labs processes this data;

- For the safety of our employees and that of scientists, researchers and (future) doctors
- To assess the suitability of donations for scientific research, development, training and education.

4. Which personal data are processed?

The personal data that we process is always provided by you. RISE Labs does not process any personal data from you that comes from third parties. The data that we process includes, but is not exclusive;

- First and last name
- Sex
- Date of birth
- Birthplace
- Address data
- Telephone number
- E-mail address
- IP address
- Copy ID proof

Other personal data that we process and that you actively provide, for example by creating a profile on this website, in correspondence and by telephone include, but are not exclusive;

- Location data
- Information about your activities on our website
- Internet browser and device type.

5. Processing: foundations and legitimate interests RISE Labs processes personal data on the basis of one of the following principles:

1. execution of an agreement;
2. permission;
3. legal obligation;
4. legitimate interest.

Our legitimate interests include: marketing, security, IT management, market research, analysis of products or services, business management, legal affairs and internal management.

6. Purposes for processing personal data RISE Labs processes your personal data for the following purposes:

- Being able to call or e-mail you if this is necessary to be able to perform our services to you
- Verify your identity, even after death
- Executing an agreement with the customer.
- Inform customers and interested parties about products and services.
- Inform customers and interested parties about relevant current events, meetings, investigations and similar activities.
- Complying with legal obligations.
- Analyzing the use and functionality of our website (types of use, click behavior, etc.).
- Discovering trends to develop new products and services (whether or not based on them) or to optimize our existing products and services.

7. Sharing with third parties RISE Labs does not sell your data to third parties and only provides this if this is necessary for the implementation of our agreement with you and to comply with any legal obligations.

We conclude a processing agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality of your data. RISE Labs remains responsible for these processes.

8. Transfer of personal data outside the EEA

The personal data collected by RISE LABS is stored on a server within the EEA. If personal data is sent to a recipient outside the EEA, this will only be done to a recipient in a country that, according to the European Commission, offers a level of protection that is appropriate for personal data.

If personal data is sent to a recipient in a country that does not offer an adequate level of protection, RISE Labs will ensure that the legally required safeguards are taken as stated in the AVG.

9. Storage periods RISE Labs stores personal data in accordance with its internal retention policy as long as:

- A customer relationship with RISE Labs is present or you continue to show interest in the work of RISE labs.
- RISE Labs is required by law to store your data.
- RISE Labs believes it is allowed to store your data on the basis of necessity.

10. Your rights, including the right to object

You have the right to know which personal data RISE Labs has recorded about you and to whom we provide your personal data. In addition to the right to view, you also have the following legal rights with regard to our processing of your personal data:

- The right to withdraw your consent, insofar as our processing of your personal data is based on it.
- The right to submit a complaint to the Dutch Data Protection Authority.
- The right to rectify / correct your data.
- The right to delete your personal data.
- The right to limit the processing (s) concerned.
- The absolute right to object to direct marketing.
- The right to object to processing that takes place because of the justified interests of RISE Labs.

You can send your request to info@riselabs.eu. To ensure that the request for inspection has been made by you, we request that you send a copy of your proof of identity with the request. Make in this copy your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and Citizen service number (BSN) black. This is to protect your privacy. We will respond to your request as quickly as possible, but within four weeks.

11. Revoke permission

In the context of the use of products and services from RISE Labs, as well as in the event of a shown interest in products and services, you may receive information from us. If you no longer wish to receive this, you can use the unsubscribe option at the bottom of every message you receive.

12. Cookies

RISE Labs only uses technical and functional cookies and analytical cookies that do not infringe your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and, for example, remember your preferences. We can also use this to optimize our website. You can opt out of cookies by setting your internet browser so that it no longer stores cookies. In addition, you can also delete all information that was previously saved via the settings of your browser.

13. Security

RISE Labs takes the protection of your data seriously and takes appropriate technical and organizational measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. If you have the impression that your data is not properly protected or there are indications of abuse, please contact our customer service or via info@riselabs.eu

14. Contact For questions and / or comments regarding the topics covered in this privacy statement you can always contact our data protection officer Kelly Dunlap. She can be reached at info@riselabs.eu. RISE Labs BV Benit 30a 1043BB Amsterdam <https://www.riselabs.eu>

15. Changes to this privacy statement

The way RISE Labs processes personal data, the purpose, the composition or the amount of data that is processed can change. That is why RISE Labs reserves the right to adjust this privacy statement.