



GreenOnline

# Privacy Statement

Version 1.4 – 14/03/2023

## 1. Introduction

This privacy statement ("**Statement**") provides information on the processing of personal data by GreenOnline B.V., a company located at Gustav Mahlerlaan 1025, 1082 MK Amsterdam, registered in the Netherlands Chamber of Commerce under number 34202424 ("**GreenOnline**"). Further contact details are provided at the bottom of this Statement. Websites: Moneytoring.com, opzeggen.nl, opzeggen.be, kündigen.de, cancelar.es, resilieronline.fr, disdetteonline.it, kuendigen.ch, comment-resilier.be, contractterminator.pl are an initiative of GreenOnline BV (www.greenonline.nl).

This Statement applies to all personal data processed by GreenOnline and/or on behalf of GreenOnline ("**Users**", "**You**" or "**Your**"), based on which they may be identified or become identifiable ("**Personal Data**").

This Statement sets out the elements necessary for GreenOnline's compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation ("**Applicable Laws**"). GreenOnline reserves the right to review and/or amend the Statement periodically, in order to comply with (local and/or European Union) legislation, and for any other purpose deemed reasonably necessary by GreenOnline.

Please find below an overview of the subjects which will be discussed in this Statement.

- Categories of Personal Data
- Purpose, legal ground and retention period of data processing
- How we will use your data?
- Security of Personal Data
- Transfer of Personal Data
- Rights in relation to Personal Data
- What are cookies
- Who places what types of cookies
- Questions and inquiries



## 2. Categories of Personal Data

GreenOnline processes certain Personal Data, depending on the subscription that is cancelled. This entails that specific Personal Data is only requested if this is required by the service provider with whom you have a subscription that You want to cancel ("**Service Provider**").

## 3. Purpose, legal ground and retention period of data processing

GreenOnline is processing Personal Data based on the following legal grounds and for the following purposes:

- We process Your Personal Data in order to cancel the subscription You want us to cancel ("**Cancellation Services**").
- Because of the nature of the Cancellation Services, i.e. to cancel subscriptions, we sometimes receive special categories of personal data such as political opinion or trade union membership when you want to cancel your membership of a political party or trade union. In addition, some of the Service Providers require a copy of ID to cancel a subscription. We want to stress we only ask for a copy of your ID when this is required by Your Service Provider. Please make sure you only upload a copy of ID where your photograph and Tax Identification Number are blurred because that information is not required. Our legal ground for this processing is Your explicit consent.
- In addition, we process Your Personal Data for our legitimate interest to improve the Cancellation Services. In doing so, we ensure that the impact on Your privacy is as limited as possible, by, amongst others, aggregating Your Personal Data to the extent possible.

GreenOnline will only process Personal Data to the extent necessary for the described purposes. If there is a need to process Personal Data for other purposes, GreenOnline will only do so if such processing is compatible with the original purposes or if You give consent to such processing. GreenOnline will in any event provide You with further information on such purpose prior to the further processing.



#### 4. How we will use your data.

GreenOnline collects your data so that we can:

- Process your letter cancellation
- Sent emails to you regarding cancellation of contracts for you specific or in general (we will offer you the option to opt-out of these emails).

#### 5. Security of Personal Data

GreenOnline handles Personal Data carefully and uses appropriate technical and organizational measures to preserve the integrity and security of Your Personal Data. Our implemented technical and organizational measures include, amongst others:

- access controls, on a "need to know"-basis;
- access audit trail;
- pseudonymization;
- encryption; and
- measures that prevent reading, copying, changing or removing during the storing, processing and transporting of personal data.

#### 6. Transfer of Personal Data

GreenOnline transfers Your Personal Data – as necessary in view of the listed legal grounds – to the following recipients:

Recipient	Purpose	Privacy Statement
<b>Mailgun</b>	To provide our e-mail services towards end users	<a href="https://www.mailgun.com/legal/privacy-policy/">https://www.mailgun.com/legal/privacy-policy/</a>
<b>AWS</b>	The provision of the Services initiated by Customer from time to time like platform hosting, storage and other Services	<a href="https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf">https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf</a>
<b>Sniptech</b>	To provide our customer support service	<a href="https://www.sniptech.com/privacy-policy">https://www.sniptech.com/privacy-policy</a>



<b>CM.com</b>	To provide our e-mail and newsletter services	<a href="https://www.cm.com/nl-nl/app/legal/cm-com/privacy-policy/">https://www.cm.com/nl-nl/app/legal/cm-com/privacy-policy/</a>
<b>Google</b>	Use of Google services supporting our day by day business, like e-mail and file sharing	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
<b>10KB</b>	To develop and improve websites and services	<a href="https://10kb.nl/Nederland%20ICT%20Voorwaarden.pdf">https://10kb.nl/Nederland%20ICT%20Voorwaarden.pdf</a>
<b>Molly</b>	To process secure online payments	<a href="https://www.mollie.com/nl/privacy">https://www.mollie.com/nl/privacy</a>
<b>GoCancel</b>	To provide cancellation services; GoCancel handles the cancellation process towards organizations	<a href="https://gocxl.com/wp-content/uploads/2022/08/20220606_GoCancel_Privacy-Statement_V1.1_ENG.pdf">https://gocxl.com/wp-content/uploads/2022/08/20220606_GoCancel_Privacy-Statement_V1.1_ENG.pdf</a>
<b>Zendesk</b>	To provide customer support service directly to end users and 2nd line support for Sniptech customer support	<a href="https://www.zendesk.nl/company/agreements-and-terms/privacy-notice/">https://www.zendesk.nl/company/agreements-and-terms/privacy-notice/</a>

GreenOnline does not transfer Personal Data to a third country or international organizations outside of the European Union/European Economic Area ("EU/EEA")

Aforementioned organizations may process Your Personal Data outside the EU/EEA countries. These transfers of Personal Data only take place in compliance with the Applicable Laws and where appropriate safeguards are in place that ensures the level of protection of Data Subjects as required by these Applicable Laws (e.g. transfers on the basis of EU Model clauses).

## 7. Rights in relation to Personal Data

Data Subjects have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier given consent), as well as the right to data portability.



The procedure of GreenOnline that enables Data Subjects to exercise these rights, is described below.

Data Subjects may file a request to access Personal Data processed by GreenOnline and GreenOnline shall respond as soon as possible, and in any event within one (1) month, about:

- whether GreenOnline holds any Personal Data relating to You; and,
- provide information on the purposes of the processing, the categories, the recipients (if applicable) the envisaged period for which the Personal Data will be stored, or the criteria used, the existence of the right to request rectification, erasure, restriction or to object to such processing, the right to lodge a complaint with a supervisory authority, the appropriate safeguards and the source(s) of the Personal Data.

GreenOnline will comply with a legitimate request of a Data Subject for rectification, addition and erasure, if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the Applicable Laws.

GreenOnline informs the Data Subject within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection. Information provided shall be free of charge. Data Subjects can exercise these rights at reasonable intervals. Data Subjects can exercise their rights by contacting the Privacy contact person in writing or per e-mail at (see address below).

Please note GreenOnline may at times be unable to fully comply with a request to erase Personal Data. This is because of compliance with legal obligations such as to comply with a law enforcement request or because such information is needed for the exercise of legal claims.

## **8. What are cookies?**

By using the GreenOnline websites, cookies are placed on Your device. Cookies are small text files that enable tracking information about Your use of the platform. For example, if You use the same device as before, cookies remember Your preferences and the content You see is loaded faster. There are different types of cookies; functional, analytical and tracking cookies.



## 9. Who places what types of cookies?

GreenOnline places functional and analytical cookies on Your device when You submit a letter cancellation – as further set out below.

### 9.1. Functional and analytical cookies.

These cookies are essential to enable you to use the GreenOnline websites regarding cancellation or the collection of (aggregated) statistics on such use.

In particular, functional and analytical cookies are used to:

remember your chosen country, language settings and other preferences, enabling you to effectively use the GreenOnline website; and.

help GreenOnline understand how you use the services on the websites and improve them.

### 9.2. Tracking Cookies.

GreenOnline might use tracking cookies for marketing purposes. Users are able to decline these cookies on the websites.

### 9.3. Permanent and session cookies

Two types of cookies are used on the GreenOnline B.V. websites: session and permanent cookies. Session cookies are temporary cookies that remain on Your device until You leave the GreenOnline B.V websites. A permanent cookie remains on Your device for a longer period of time.

### 9.4. Does GreenOnline also process Personal Data?

Cookies may involve the collection of Personal Data, as further set out in this Statement.

GreenOnline B.V collects the following Personal Data when You sign up for the newsletter:

- First name
- Last name
- E-mail address

### 9.5. How can you disable or delete cookies?

You can always change your cookie settings. You can also change the settings regarding cookies in your browser. This way you only need to do it once for all visited websites. Please note that disabling cookies may cause problems with functionality on our website.



Depending on your browser, instructions can be found on the following websites:

- [Internet Explorer: https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies](https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies)
- [Microsoft Edge: http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq](http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq)
- [Chrome: https://support.google.com/chrome/answer/95647](https://support.google.com/chrome/answer/95647)
- [Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences](https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences)
- [Safari: https://support.apple.com/nl-be/guide/safari/sfri11471/mac](https://support.apple.com/nl-be/guide/safari/sfri11471/mac)

## 10. Questions and inquiries

For queries and about this Statement of GreenOnline or complaints, please contact the privacy point of contact: [privacy@greenonline.nl](mailto:privacy@greenonline.nl)

If you are unhappy with the way we treat your complaint you may file a complaint with the relevant Data Protection Authority.

Country	Data Protection Authority	Website
Netherlands	Autoriteit Persoonsgegevens	<a href="https://www.autoriteitpersoonsgegevens.nl/">https://www.autoriteitpersoonsgegevens.nl/</a>
France	Commission Nationale de l'Informatique et des Libertés	<a href="https://www.cnil.fr/">https://www.cnil.fr/</a>
Germany	Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	<a href="http://www.bfdi.bund.de/">http://www.bfdi.bund.de/</a>
Italy	Garante per la protezione dei dati personali	<a href="https://www.garanteprivacy.it/home">https://www.garanteprivacy.it/home</a>
Ireland	Data Protection Commission	<a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>
Spain	Agencia Española de Protección de Datos	<a href="https://www.aepd.es/es">https://www.aepd.es/es</a>
Poland	Polska Agencja Ochrony Danych	<a href="https://paod.pl/">https://paod.pl/</a>



Belgium	Autorité de protection des données Gegevensbeschermingsautoriteit	<a href="https://www.dataprotectionauthority.be/citizen">https://www.dataprotectionauthority.be/citizen</a>
Switzerland	The Federal Data Protection and Information Commissioner (FDPIC)	<a href="https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html">https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html</a>
Great Britain	The Information Commissioner's Office (ICO)	<a href="https://ico.org.uk/">https://ico.org.uk/</a>
Austria	Österreichische Datenschutzbehörde	<a href="https://www.data-protection-authority.gv.at/">https://www.data-protection-authority.gv.at/</a>
Norway	Datatilsynet	<a href="https://www.datatilsynet.no/en/about-us/">https://www.datatilsynet.no/en/about-us/</a>
Sweden	Integritetsskyddsmyndigheten	<a href="https://www.imy.se/other-lang/">https://www.imy.se/other-lang/</a>
Denmark	Datatilsynet	<a href="https://www.datatilsynet.dk/english">https://www.datatilsynet.dk/english</a>
Ireland	DPC	<a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>