



## Privacy Policy

Last modified on 23-03-2020

This is the Privacy Policy of T.C.P.A. Consultancy (hereinafter referred to as “T.C.P.A. Consultancy”, “we”, “us” or “our”), a company with address; Bielsenstraat 12, 2316 KA Leiden, Netherlands. T.C.P.A. Consultancy is registered with the Chamber of Commerce under number: 53858018. This Privacy Policy explains how we collect, use, share and protect data in relation to our website [www.tcpaconsultancy.com](http://www.tcpaconsultancy.com) (the “Website”), and any other subpages that they fall under that.

Processing of the personal data is done in a manner that is in accordance with the General Data Protection Regulation and the national legislation that provides further details.

Our Privacy Policy applies to all visitors, users and all others who have access to the Website (“Users”). By using of our Website you agree with this privacy policy. We are not liable for any risk or damage you suffer as a result of use from our website.

What kind of data do we collect?

When we collect data from you, it will be the following data that you provide to us via a form or email:

1. Name;
2. Telephone number;
3. Email address;
4. Address;
5. Communication between T.C.P.A. Consultancy and you (we are allowed to send relevant emails).

In addition, by using our website, you agree for us to collect the following data if necessary.

Log file information

We may collect information that your browser sends when you visit our Website. This log file may contain information such as your IP address, browser type, browser version, the pages of our Website you visit, the time and date of your visit, your location information if you share it, the time you spend on it pages and other statistics.

We cannot collect your IP address by default. We can therefore not see your IP address, even if you have that option turned on. You can easily change this in your browser settings. We can not identify you as a person. We will not compare the non-identifiable information with other information available to us to establish your identity.

Analytical services

We can eventually use analytical services from third parties. This one could possibly help us with the traffic and trends on the Website to measure. The tools can collect information sent by your computer or other devices to our Website. This is about the web pages you visit, add-ons we use and the functionalities of our website that you use. These tools can use 'cookies'. These are simple text files that are stored on your hard drive or in its memory of your computer. Cookies can be saved in your computer and cookies do not damage your computer. Cookies collect information anonymously about your log information and log behavior. We cannot identify you in any way. You can easily remove these cookies from your computer by removing them from the system folder 'Cookies'. You can also access your browser settings indicate that you do not want to automatically allow cookies. When we use Google Analytics it installs a persistent cookie on your web browser, however it cannot identify you. The cookie cannot be used by anyone other than Google. Google's authority to use and share information is limited by the 'Google Analytics Terms of Use' and the 'Google Privacy Policy'. You can prevent Google Analytics from recognizing you by disabling cookies. T.C.P.A. Consultancy reserves the right to use remarketing services to advertise on third party websites after you have visited our Website. We, and third parties that we may work with, may use cookies to control the ads that are shown based on your previous visits.

When you visit our website for the first time, we will ask you to allow cookies. You can refuse this. Failure to do so may affect the functionality of the website.

Google: Google recommends using the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - to be installed for your web browser. Analytics Opt-out Browser Add-on offers visitors the opportunity to prevent their data from being collected and used by Google Analytics. For more information about Google's privacy policy, please visit the visit next page: <http://www.google.com/intl/en/policies/privacy/>.

Other services (see below) that we (may) use to collect data about the behavior of visitors to our website. This one information cannot be linked to a person and only gives us insight into the quality of our website and our services. We use this information to optimize our website and services. Google Analytics: Analyzes your visit to our website. Provided on that statistical data that is in no way identifiable;

Mailchimp: The moment you leave your name and email address on the website and you sign up for the T.C.P.A. Consultancy newsletter, these become data also eventually shared with Mailchimp to send newsletter to you.

Why do we collect this data?

We may collect this data in accordance with Article 6 paragraph 1 sub f jo. Recital 47 last sentence of the General Regulation Data protection. For collecting and processing this data we do not need to ask permission in accordance with the above mentioned GDPR provisions, without prejudice to the requirements and other rules of apply.

In case you have an agreement with us, we may also collect data pursuant to Article 6, paragraph 1, sub b of the General Regulation Data protection. For collecting and processing this data we do not need to ask permission in accordance with the above mentioned GDPR provisions, without prejudice to the requirements and other rules of apply.

How do we use this information?

All information that we may collect goes to our supporting and improving our Website by:

1. improving and testing the effectiveness of the website and services;
2. to map statistics, such as the total number of visitors and traffic on the website;
3. to solve or diagnose technical problems;
4. test or develop new products and features;

Communication

We may use your information to contact you with newsletters or marketing and promotional purposes that may be of interest to you. You can unsubscribe from this communication by sending us an e-mail or clicking on the unsubscribe button if available.

How is this information shared?

We will not rent or sell your (personal) data to third parties. We may provide non-identifiable information, which is in the view of our justifiable interest, to third parties insofar as this does not conflict with the General Data Protection Regulation, in order to use the services of these third parties, without prejudice to the responsibility of these third parties and us to handle this data responsibly. We can also share (personal) data available to us for the sake of an order issued by a competent government agency, or in any other legal case orders.

We are not responsible for data that third parties without our consent, through an infringement or legal violation or crime have stolen / copied or otherwise, without prejudice to our responsibility to take adequate measures to prevent this from happening.

Change of control

When T.C.P.A. Consultancy, or part of it, is sold, transferred whether one of our assets ends up with another organization (for example if as a result of a merger, takeover, bankruptcy, dissolution or liquidation), then the data collected through the Website can fall among those sold or transferred things. The buyer or transferee will have to follow this Privacy Policy.

Legal request and prevention of damages

On the basis of a legal request, we are obliged to grant access to and/or share information available to us (such as a search warrant, court order, or subpoena). We are also obliged to keep and/or share your information when we believe it is necessary for detecting, preventing and reporting fraud or other illegal activities and to protect us, you and others. Information we received from/about you can be opened, edited and saved for longer period when this is necessary because of a legal request or legal obligation, an investigation related to our terms, policies or to otherwise prevent any sorts of damage.

Security and safety

T.C.P.A. Consultancy has appropriate technical and organizational measures taken to protect your data against loss or any form of unlawful processing. We use security measures to ensure that information through the Website is secured. However, it is not possible for T.C.P.A. Consultancy to ensure that the information on the Website is not accessed, disclosed, changed or destroyed. You are at all times responsible for self managing the emails between you and T.C.P.A. Consultancy. We are not responsible for the functionality, privacy or security measures of any other organization. The use of the website and the information exchanged, collected and analyzed there is encrypted with an SSL certificate. You can recognize this by the lock and the green letters in the URL bar.

International transfer

Collected data and statistics may by the aforementioned third parties be transferred and maintained on computers and / or servers located outside of The Netherlands and where data protection laws can differ. This is about non-identifiable information.

Retention period

In accordance with the law, T.C.P.A. Consultancy stores personal data no longer than is necessary for the realization of the purpose for which they are collected or processed, without prejudice to our responsibility for and obligation to conduct a sound administration and data policy.

#### Right to Inspection, modification, objection and oblivion

When you want to view your data or if you want to change your data or if, for example, they are incorrect, irrelevant or incomplete, then you can request this by sending an email to [info@tcpaconsultancy.com](mailto:info@tcpaconsultancy.com) or send a letter to:

T.C.P.A. Consultancy  
Bielsenstraat 12  
2316 KA, Leiden  
The Netherlands

#### Third-party applications, websites and services

We are not responsible for the practices of applications, websites or third party services linked to or from our Website. Our Privacy Policy does not apply when you use a link to or from our Website to an other application, website or service. Your behavior on an application, website or service of a third party, including the parties that have a link on our website, are subject to their own rules and policies.

#### Children's privacy

Our website does not specifically and consciously request information from persons younger than 16 years ("Children"). If we find out that we have personal data collected from Children without the consent of their parent (s) or guardian, then we will take steps to delete this information from our servers. If you have any suspicions that your child has provided us with information without your permission, you can contact us at [info@tcpaconsultancy.com](mailto:info@tcpaconsultancy.com) or by letter addressed to:

T.C.P.A. Consultancy  
Bielsenstraat 12  
2316 KA, Leiden  
Netherlands

#### Information from abroad

Legislation from abroad can deviate from Dutch legislation regarding data. The General Data Protection Regulation, which applies throughout the European Union applies is not concrete about all privacy-related Affairs. Legislation and case law may differ per country, for example for what concerns who is a minor. On the use of our website and our services Dutch law applies. Testing the collection and processing of data will also always take place on the basis of Dutch law.

#### Amendments

T.C.P.A. Consultancy may adjust or update this Privacy Policy from time to time. You are therefore advised to consult this Privacy Policy regularly. Amendments to this Privacy Policy will take effect when they are published on the Website. This Privacy Policy also is updated to comply with legislative changes and other requirements and obligations.

#### Applicability

Dutch law applies to this Privacy Policy. In case of a legal procedure, the court in The Hague, located at the Prins Clauslaan 60, is authorized to take note and to handle the case.

#### Contact

If you have any questions about this Privacy Policy, please contact T.C.P.A. Consultancy, attn. Alvin Leito by sending an e-mail to [info@tcpaconsultancy.com](mailto:info@tcpaconsultancy.com)



T.C.P.A. Consultancy  
T.C.P.A. Family - since 2011