

Privacy Statement

Max and Sons Reforestation Company N.V. (Max and Sons)

Version: 2.6

It goes without saying that Max and Sons Reforestation Company N.V. (Max and Sons) takes the right to privacy and the protection of personal data very seriously and attaches importance to treating your personal data carefully and confidentially. That is why Max and Sons is happy to explain in this privacy statement which personal data about you is processed when you visit our website, contact Max and Sons or use our services, for what purpose and what rights you have with regard to the processing of your personal data.

This privacy statement may be changed from time to time. The most recent version of the privacy statement can be found on our website. In the event of significant changes that could significantly affect you, we aim to inform you immediately.

The most recent version of this privacy statement is dated July 2024.

About Max and Sons

Max and Sons Reforestation Company N.V. (Max and Sons), located at 38, Avenue du Dix Septembre, L – 2550 Luxembourg, is responsible for the processing of personal data as shown in this privacy statement.

Contact details

<https://maxandsonsforests.com/>

38, Avenue du Dix Septembre

L – 2550 Luxembourg

welcome@maxandsonsforests.com

+31 85 303 26 86

All questions about the processing of personal data by Max and Sons can be directed to

welcome@maxandsonsforests.com

To whom does this privacy statement apply?

This privacy statement applies to persons who visit and use the website of Max and Sons, contact Max and Sons, use the services of Max and Sons or register or create a user account through the website.

In this privacy statement we also explain how we use your personal data if you apply for a position or internship at Max and Sons. In addition, we can obtain your personal data in the context of our services, for example if you contact us.

For certain forms of service, we place advertisements to which a relation can respond. It is also possible that we personally approach relations by telephone, e-mail or at the office.

This privacy statement also applies to the use of any other websites owned by Max and Sons.

How does Max and Sons process your personal data?

Below you will find an overview of the purposes for which Max and Sons processes personal data about you. In each case, it is indicated which personal data Max and Sons uses for that specific purpose, what the legal basis is for being allowed to process that data and how long the data will be kept.

Services

If you give an order to Max and Sons, your contact details will in any case be requested, including your name and address. In order to serve clients, it may also be necessary to process other data, for example information you provide to us for your file and documentation that contains data from third parties. This depends on the nature of the case and the work that Max and Sons performs. It may also be necessary to process data to be able to complete your request or to be able to offer and deliver the right product in the right way.

The processing of your personal data for this purpose is necessary for the execution of the agreement between you and Max and Sons.

We may also request a copy of a valid identity document/ID card. We will always request you to provide us with only those personal data that are strictly necessary to achieve the purpose, in particular to verify your identity and to prevent fraud, abuse or other unlawful behaviour. Make your citizen service number (BSN) illegible in this copy. You can use the [CopyID](#) app from the Dutch government for this.

The processing of personal data contained in these documents is necessary for the execution of the agreement between you and Max and Sons (e.g. regarding your participation in an activity/action or investment). The processing is also necessary for the representation of Max and Sons' legitimate interest, in particular to verify your identity and to prevent fraud, abuse or other unlawful behaviour.

We can also process data because we are required to do so by law. There are many rules and regulations that apply to our business. For example, we can take measures to combat fraud, tax evasion, terrorist financing and money laundering. This also includes identifying you and demonstrating that we know who you are. That is why we keep a copy of your identity document or perform searches in third-party databases for the purpose of compliance with your data.

Financial administration

In order to be able to invoice you for services rendered, we process your contact details.

The processing of personal data for this purpose is necessary for the execution of the agreement between you and Max and Sons.

We may provide paid products and/or services as In-App Purchases. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

We will store the history of credits that were awarded, deducted and/or purchased through the App.

Relationship management

Max and Sons values maintaining contact with (potential) clients and other business relations. Your (contact) data may be used to invite you to meetings or other events. We also use data to maintain central customer records, conduct marketing activities, prevent fraud, and for risk management. The processing of your personal data for the aforementioned purposes is justified on the basis of Max and Sons' legitimate interest.

However, for specific direct marketing activities governed by the e-privacy Directive and the Dutch Telecommunications Act, we will rely on obtaining your free and explicit consent before engaging in such activities, such as targeted ads, emails, text messages, WhatsApp messages and phone calls. You will have the option to provide your consent for these specific activities and you will also have the option to, at any given time, withdraw your consent again. Please note that the processing of your personal data for other purposes, such as maintaining customer records, carrying out general marketing activities, fraud prevention, and risk management, will continue to be based on Max and Sons' legitimate interest.

We have a central relationship administration within our group of companies. Our customer service uses this administration to see which products you have with us, so that we can answer you properly and quickly. The information we use in our records includes your name, your date of birth, your address, other contact details, information about the product or products you have with us, payment information and marketing information.

We may also share your data within the group of companies of which Max and Sons is a part. In addition to all subsidiaries of the shareholder of Max and Sons, this also includes the organizations of the direct shareholders and participating interests of the holding company (the "Group"). Within the Group, we share data for internal administrative purposes or to improve our service to you. The sharing of data in this context may also take place with Max and Sons' Affiliated Entities, and as a relationship with all other entities with which Max and Sons is (contractually) bound.

In connection with this Agreement and its Terms, you acknowledge that Max and Sons will process your personal, payment, and transaction data solely for the purpose of fulfilling the Agreement. This processing is carried out based on the legal ground outlined in GDPR Article 6.1(b) – 'processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.'

This processing includes sharing your information with Stichting De Bewaarder, acting as a data processing entity and/or payment office, and any other (legal) entities within the economic group or holding structure of Max and Sons or its Affiliated Entities.

Additionally, your data may be shared with any (legal) entities to which Max and Sons is (contractually) bound, in whole or in part.

This acknowledgment extends to the necessary sharing of information with third parties for ATF/AML (“Wwft”) compliance monitoring services, payment service providers, and data storage services. Max and Sons will make the necessary efforts to identify such third parties, which may change over time, on its Site or in this Privacy Statement.

Sometimes we may have to ask for your permission separately to use data. If you have given permission in such a case, you can also withdraw it. You do not have this right when we use your data on other possible bases.

Data about payments to Max and Sons, invoices, agreements, statements, etc. are kept for a longer period of time to the extent that we are legally obliged to do so.

Contact

You can get in touch with Max and Sons in various ways, via the contact form or the chat function on the website, by e-mail and by telephone.

With a view to improving the quality of service, training, coaching and assessment of employees, we record some of the telephone conversations. When talking about your products or services, we can also save these recordings as a record of our agreements. We also record the content of chats.

We use the information we obtain from you for this contact to answer your question and to be of service to you, or to provide evidence to comply with legal obligations, to prevent fraud and to improve the quality of telephone conversations and chats.

The processing of your personal data is necessary for the representation of Max and Sons' legitimate interest.

Cookies

A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website.

Functional and analytical cookies are processed on the basis of the legitimate interest of our organization, in particular optimizing our web applications and your user experience. Marketing cookies are processed on the basis of your free consent.

Read more about it in our [cookie statement](#).

Newsletter

Max and Sons would like to keep you informed about developments in our field of activity. You can sign up for the newsletter. Max and Sons processes your e-mail address for sending newsletters.

The processing of your e-mail address in the context of digital direct marketing is always based on your free, informed and explicit consent. You can always unsubscribe from the newsletter by clicking on the unsubscribe button in the newsletter.

Blogs

The Max and Sons website may contain links to share blogs on social (media) networks or third-party websites, such as X (formerly: Twitter), LinkedIn or Facebook. Before using those services of third parties, it is advisable to first read the privacy statement of those third parties.

Working at Max and Sons

Personal data provided to Max and Sons by an applicant will only be used by Max and Sons to enable a responsible, effective and efficient recruitment and selection process.

The data and documents provided by you, including contact details, CV and motivation letter, will be processed by Max and Sons to determine your eligibility for the vacancy for which you have applied or, in the case of an unsolicited application, to determine whether you qualifies for a position within Max and Sons, other group companies, Max and Sons' Affiliated Entities, or as a relationship with all other entities with which Max and Sons is (contractually) bound.

These processing operations are necessary for the representation of Max and Sons' legitimate interest. In this case, that interest consists of recruiting suitable new staff.

Data from persons under the age of 16

Our website and/or service does not intend to collect data about website visitors who are younger than 16 years old. However, we cannot check whether a visitor is older than 16. We therefore advise parents to be involved in the online activities of their children, in order to prevent data about children from being collected without parental consent.

If you are convinced that we have collected personal information about a minor without this permission, please contact us at welcome@maxandsonsforests.com and we will delete this information.

Automated decision making

Max and Sons does not make decisions based on automated processing on matters that can have (significant) consequences for people.

This concerns decisions that are taken by computer programs or systems, without involving a person (for example an employee of Max and Sons).

How long we keep the personal data

Max and Sons does not store your personal data for longer than is strictly necessary to realize the purposes for which your data is collected.

Max and Sons uses the following retention periods for your personal data:

- Personal data that you provide to Max and Sons when registering and registering for a user account or with other services, Max and Sons stores as long as necessary for related activities. Your personal data will then be deleted within 36 months.
- Under the Dutch General Tax Act, Max and Sons is obliged to keep financial data for a period of seven years.
- Max and Sons will keep data that Max and Sons processes from you if you contact us for as long as necessary to handle your question, request or complaint. Max and Sons will then delete this data within one month.
- Max and Sons saves your e-mail address for sending the newsletter as long as you are subscribed to the newsletter and will delete your e-mail address no later than one month after unsubscribing.
- Analytical data about your activities on our website is kept for a maximum of 12 months.
- Max and Sons stores the personal data of applicants during the recruitment and selection procedure. Your application data (in the event of a rejection) will be deleted by Max and Sons no later than 12 months after the termination or completion of the application procedure. With your permission, Max and Sons will store your application data for a period of 36 months in order to be able to inform you if a suitable position becomes available for you at a later date.

Sharing personal data with third parties

Max and Sons uses the services of external companies, subcontractors and/or suppliers (so-called processors) who perform specific tasks or assignments at the request of Max and Sons and with whom your personal data can be shared. These service providers only process your personal data on behalf of Max and Sons. A so-called processing agreement applies to the processing by service providers, in which Max and Sons has ensured that the service provider will only process the personal data on behalf of Max and Sons. This concerns the following categories of service providers:

- External hosting providers, including cloud providers for the storage and management of your data;
- Third parties with applications/tools that allow us to better protect our systems against unauthorized access and/or loss of data;
- Payment Processors for In-App Purchases, such as Apple store (see privacy policy: <https://www.apple.com/legal/privacy/en-ww/>) and Google Play (see privacy policy: <https://policies.google.com/privacy?hl=en>);
- External parties with applications/tools in the field of accounting, recruitment, personnel management and management;
- Other specific tasks that are outsourced in the context of IT support, such as administration and e-mail marketing.

We may also share your personal data with third parties who qualify as controllers. For example, we may use external consultants, independent auditors and competent authorities, who process personal data for their own purposes. The processing of personal data by these parties is subject to the privacy statement of the relevant party.

Where are your personal data processed?

In principle, your personal data will only be processed within the European Economic Area (“EEA”).

If we use a supplier that is located outside the EEA, we will primarily use suppliers that are located in a safe third country, for which the European Commission has issued an adequacy decision.

When we use a supplier located in another third country, in this case the United States, we will ensure that the (potential) transfer of your personal data is protected by appropriate safeguards (e.g. Standard Contractual Clauses, Binding Corporate Rules, etc.) and take the necessary additional technical, legal and organizational safeguards to ensure the same level of security and confidentiality of your data that applies within the EEA.

For more information about international transfer safeguards, please contact us using the contact details provided in this privacy statement.

What are your rights?

Right of access

You have the right to obtain confirmation from Max and Sons about whether or not your personal data is being processed and, if that is the case, to obtain access to that personal data and additional information about the processing of your personal data. Max and Sons therefore provides you with a copy of your personal data.

Right to rectification

You have the right to obtain rectification of inaccurate or incomplete personal data. If possible, you can provide additional personal data to complete the collection of personal data.

Right to erasure (right to be forgotten)

Under certain circumstances you have the right to submit a request to delete your personal data. Max and Sons will delete your personal data, for example if your personal data is no longer necessary for the purposes for which it was collected, if you withdraw consent on which the processing is based and there is no other legal basis for the processing, if you object to the processing and your interests outweigh, or if Max and Sons is legally obliged to delete your personal data.

Right to restriction

In some cases you have the right to obtain from Max and Sons the restriction of the processing of your personal data. This means that Max and Sons temporarily pauses the processing of your personal data, for example if you have contested the accuracy of your personal data or have objected to the processing of your personal data. If the request is granted, Max and Sons will not further process the personal data in question during the term of the restriction, unless this is permitted on the basis of the GDPR.

Right to object

You have the right to object to the processing of personal data based on Max and Sons' legitimate interests. Max and Sons will then no longer process the personal data, unless Max and Sons demonstrates that there are compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or that are related to verifying your identity and to prevent fraud, abuse or other unlawful behaviour.

Objection to direct marketing

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing purposes. In that case, Max and Sons will no longer process your personal data for those purposes.

Data portability

You have the right to receive your personal data that you have provided to Max and Sons in a structured, commonly used and machine-readable form and you have the right to forward this data to another controller, where the processing is based on your consent or on an agreement .

Withdraw permission

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing before it has been withdrawn.

NTD-procedure

Max and Sons values the protection of rights of individuals and organisations on the internet and makes every effort to delete any unlawful or infringing content or information from its platform. In order to do so Max and Sons uses the following procedure:

1. Submitting a request for deletion

If you are of the opinion that content or information on our platform is unlawful or infringing, you can submit a request for deletion to Max and Sons. The request must be submitted via the contact form on our website and has to contain the following information:

- A detailed description of the content or information for which the request for deletion is being submitted;
- The reason(s) why the content or information is unlawful or infringing;
- The location of the content or information on our platform;
- Any possible pieces of evidence supporting the request;
- Your contact details, including your name, address, e-mail address and phone number.

2. Evaluation of the request

After receiving the request, Max and Sons will evaluate the request and seek contact with you as soon as possible to further discuss and verify the request. Max and Sons will also seek contact with the person or party that posted the content or information to notify them of this request.

3. Deleting the content or information

If the request for deletion is granted, Max and Sons will remove the relevant content or information from its platform as quickly as possible. If necessary, Max and Sons will also block access to its platform for the person or party in question. Max and Sons will inform the requesting party of the deletion as soon as possible.

4. Objection to the request

If the person or party who posted the content or information objects to the request for deletion, Max and Sons will review the objection and make a decision. Max and Sons will inform the requesting party of its decision as soon as possible.

Exercising your rights

To exercise your rights, we ask you to send a request to welcome@maxandsonsforests.com

To ensure that the request for access has been made by you, we may ask you to send a copy of your proof of identity with the request. Make 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 in this copy. This is to protect your privacy.

We recommend using the [CopyID app](#) from the Dutch government to make a safe copy of your identity card.

We will respond to your request as soon as possible, but within four weeks.

Max and Sons would also like to point out that you have the opportunity to file a complaint with the national supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can do that via [this link](#).

How we protect personal data

Max and Sons takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized changes.

If you have the impression that your data is not properly secured or there are indications of misuse, please contact welcome@maxandsonsforests.com
