

# Privacy Policy

This is the website of Xebia Nederland B.V., a company with its principal place of business at (1213 TL) Hilversum, The Netherlands, on the Utrechtseweg 49 (“we”, “us”, and “our”) and applies to all visitors of our website (“you” and “your”). This privacy policy was last updated on November 17<sup>th</sup>, 2014.

## Your Privacy

We are committed to respecting your privacy. This privacy policy describes our privacy practices in relation to information which we collect. It explains how we may gather, track or use information we learn about you through your use of our website ([www.training.xebia.com](http://www.training.xebia.com)), our products, and our services.

Tracking is intended to improve our website, products and services. We do not sell your data to third parties nor share your information with third parties for their own external marketing purposes. However, we may share your information with third parties to improve our service provision to you, in accordance with the Section titled “**Third Parties**” below. We may collect personal data as well as non-personal data. Protecting your data is a top priority for us. The term “personal data” includes any information that enables the identification of a natural person, such as your name, physical address, company name, email address and phone number and behavior.

By visiting our website, by using our products or services, or otherwise providing us with personal information of yours, you are consenting to the practices described in this privacy policy.

## Use and Protection of Personal Data

We use personal data to process your inquiries or to provide you with access to certain information. This information may be necessary to create and verify user accounts and to process requests and transactions within our organization and with third parties for the purpose of providing our products and services to you. We will also use it to inform you of upcoming XebiaLabs products, services, promotions or events we think may interest you, to carry out online surveys, and to analyze data and trends to help improve our products and our customers’ experiences. Your permission allows us to process your personal data in order to respond more efficiently to your requests. It also allows us to personalize our services to better accommodate your needs.

We take commercially reasonable technical and organizational security measures to protect your personal data against unintended or illegitimate deletion, change or loss, as well as to protect against unauthorized transfer or access. Personal information is always stored in a secured database. Personal information is only accessed by those with the proper credentials on a “need to know” basis and the

information is kept no longer than reasonably necessary to pursue legitimate business or legal purposes. Once personal information has served its use, it is disposed of in ways that render the information unreadable and unusable.

However, we will respect your wish if you do not want to provide us with your personal data for customer service, market research or promotional purposes. If you do not wish to receive e-mailings, each e-mail sent contains a link to automatically unsubscribe. If that option doesn't work for you, you may contact us via telephone, through the US Post at the contact information below or by sending an email to [training@xebia.com](mailto:training@xebia.com) to request removal from our mailing list, and you will be removed from our mailing list at no charge.

While we promises to take commercially reasonable precautions to protect your personal information, it cannot guarantee the security of any information that you submit or warrant that the information may not be accessed, compromised, altered or destroyed through a breach of our technical or organizational security measures.

## Financial Information

Credit card or account information required to process orders for products or services placed with us is transferred over a secure connection. We will never store critical payment information for products or services on public servers. Credit card information is used solely to verify financial qualifications and to process and collect payment. We carefully selects its third party credit card processors to ensure that financial information is handled securely and confidentially.

## Privacy and Cookies Policy

"Cookies" are files that store and retrieve certain information on your computer. When you visit our website or use our services, it is possible that we will place a cookie on your computer that maintains information so that you are automatically recognized the next time you visit our website. Cookies allow us to adapt our website to your interests, to tailor the information presented to you based on your browsing preferences, such as remembering who you are for product support or personalizing pages and to save your password so that you do not need to re-enter it each visit.

If you do not want us to deploy cookies, you can set your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. Rejecting cookies however may affect your ability to use this website and some program features or services may not function properly if cookies are disabled. If you do not reject cookies, we assume that you consent to the use of cookies.

## EU Directive Compliance

Our privacy and data protection practices are made in accordance with all applicable regulations, including but not limited to the European Union Directive 2009/136/EC. Similarly, our data security practice is in accordance with, amongst others, The Dutch Personal Data Protection Act (*Wet*

*Bescherming Persoonsgegevens, WBP*). Any transfer of data beyond national borders is merely for data storage and back-up. All transfers are in strict compliance with these Directives and adhere to data security requirements.

In the event you request not to be tracked, an anonymous cookie without any personal information will be placed on your computer to prevent another permissions request. If your computer however automatically removes cookies you will be presented the permission request each time you access the website.

At your request we will send you a copy of all data stored in relationship to your individual. You can process that request at [training@xebia.com](mailto:training@xebia.com). You may ask us to correct any inaccurate information at any time by sending a comment to the address below.

## Non-Personal Data

In addition to personal data, we may automatically track general information that cannot be used to identify or reasonably identify a user, such as internet browser and operating system used, domain name of the website you are coming from, number of visits, average time of use and pages accessed. We use this information to analyze aggregate traffic patterns throughout this website to continually improve our online offerings, the website's user friendliness, its efficiency, etc. From time to time, we may disclose this aggregate or non-personal data to third parties for use in connection with our products and services. This privacy policy in no way limits our collection and use of aggregate information.

## Links to Third Party Sites

This privacy policy exclusively addresses our activities from our servers. Other sites (including those that we link to from our website, and third party sites or services which we co-brand) may have their own policies, which we do not control, and thus are not addressed by this privacy policy. We does not make any representations about third party websites and encourage users to review the contents of their privacy policies.

## Third Parties

In order for us to continue to provide its customers with our superior products and services, from time to time personal information may be shared with third parties. We take care to select and enter into agreements with third parties capable of maintaining appropriate security measures in accordance with our policies and relevant privacy laws and regulations. With your information, to the extent that it is needed, our business partners can provide services to our customers on our behalf.

## Self-Assessment

We assure compliance with our policy through periodic employee training and system security maintenance and testing. By testing the technical and organizational security measures, we can better position itself to prevent unauthorized access of personal information.

## Updates

We may update this privacy policy from time to time. If so, we will make the revised policy available through this website. Any changes to this privacy policy will take effect when they are so posted. Please check back regularly for any updates.

## Contact

We will respond to all appropriate inquiries for access and alteration, addition or deletion of personal data. If you have any questions or comments regarding data security guidelines, please do not hesitate to contact us using the contact information below. If you have any other comments on this privacy policy, please contact:

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