

## Privacy statement Mediahuis NL B.V.

### Introduction

This privacy statement is applicable to all products and services of Mediahuis NL B.V. and its subsidiaries (Mediahuis) unless they expressly apply their own privacy statement. Click [here](#) for an overview of Mediahuis products and services.

In this statement, we explain which of your personal data Mediahuis processes, for what purposes and the basis for that processing. We also explain how long we retain your data, the parties with which we share data and what your rights are in respect of these data, for example a right of access or erasure.

The controller for the data processing is Mediahuis NL B.V., Basisweg 30, 1043 AP Amsterdam. Mediahuis has appointed Mr Marc Cox as data protection officer.

### Processed personal data

#### *Data provided by you*

If you order or subscribe to one of our products or services, register, sign up for a newsletter, participate in a marketing campaign or survey, contact Mediahuis or otherwise use the services of (a part of) Mediahuis, the personal data you provide, such as your name, address, contact details, age and gender, will be recorded and processed.

#### *Data obtained via cookies and similar technologies*

In addition to the personal data that you provide to Mediahuis yourself, Mediahuis may also collect, record and process (personal) data by using cookies and similar technologies. This concerns the following data, which may (in combination with other data) be considered as personal data:

- online identifiers, such as IP address, advertising ID of a mobile device or cookie ID;
- information on your device, operating system and browser, with which access to a service was obtained. For example, this could be the version of the operating system and the type of browser you use to gain access to a service;
- information on your use of a service, such as your browsing behaviour, at what time you use a service and the type of service used, which information can be linked to your account when you are logged in;
- location data originating from your device or derived from your IP address which is transmitted to us when you use a particular service. Prior to the installation of apps that transmit the location of the (mobile) device, you will be asked for explicit consent for the processing of the location data of the (mobile) device.

You can find more information about cookies and similar technologies and the use thereof on the platforms of Mediahuis on the relevant platform.

#### *Automatically generated data*

When using our digital services, it is possible that an account is automatically created for you. You can also create an account yourself by registering for one of our products or services. In both cases an account ID is automatically generated, which is linked to your account.

#### *Data received from third parties*

Lastly, Mediahuis may collect, record and process personal data that it receives from third parties. This concerns the following personal data:

- data that you have provided to one of Mediahuis partners for the purpose of these data being transferred to Mediahuis, for example if you register for a Mediahuis newsletter via a partner;
- when you log in on a Mediahuis platform using your social media account via a third party, Mediahuis receives your email address and public profile information;
- data for the verification and enrichment of the data we have, including your address, telephone number, gender and age. This is done via Mediahuis data partners, such as [CDDN](#);
- data shared with us by a third party, such as an advertiser, to show you personalised ads on our platforms, as described below under 'provision for the purpose of advertisements';
- information about your browsing behaviour on platforms of affiliated companies with whom Mediahuis entered into a partnership for the compilation of collective group profiles, as further detailed under 'provision for the purpose of advertisements' below.
- information that you have provided to one of the affiliated companies with which Mediahuis works for the purpose of advertising sales, as described below under 'provision for the purpose of advertising sales'.

### Purposes and basis of data processing

Mediahuis processes your personal data for the following purposes:

- for the conclusion and performance of the contract, for example to provide the products, services or information chosen by you;
- if you have purchased a paid service or product, to invoice;
- to give you an opportunity to post and exchange information via one of Mediahuis digital services or to contact other users of those digital services.

The processing of your data for the foregoing purposes is necessary for the performance of the contract you enter into with Mediahuis when you purchase a product or service.

- to be able to offer you our products and services as completely as possible and to maintain, optimise and secure them;
- to keep you informed of the products and services of Mediahuis;
- to share your privacy settings with the parties that collect data via Mediahuis platforms, as described below under 'data processing by third parties via Mediahuis platforms';
- to send you a newsletter, user information, service message or other message (electronic or otherwise);
- to detect, prevent and combat fraud or abuse
- to show you specific Mediahuis advertisements on Mediahuis' and third-party platforms, based on data provided by you. This can be done, for example, by creating specific target groups on Facebook and/or Google using targeting tools by uploading (encrypted) email addresses. Targeted advertisements are then shown to these target groups;
- to automatically create an account for one or more of our services and products. For example, when you subscribe to De Telegraaf, an account for self-service purposes is automatically created for you.

The basis for the processing of your data for the foregoing purposes is a legitimate interest in improving and securing our products and services, in communicating with you regarding relevant information about our services (user information and service messages) and in performing (direct) marketing activities. If you have never had a paid customer relationship with Mediahuis, Mediahuis will only contact you for commercial purposes if you have given your consent.

- to enable logging in via social media sites (offered by third parties).

The basis for the processing of your data for the foregoing purpose is consent. You give this consent by logging in on one of the Mediahuis platforms using your social media account.

- to build group profiles based on characteristics and behaviour. For this we can combine your account data with data obtained via cookies and similar techniques, such as browsing behaviour. The profiles compiled by Mediahuis always consist of a group of users (for example sports enthusiasts in the age range of 20 to 30);
- to show you personalised content and advertisements;
- to show you specific Mediahuis advertisements on third-party platforms based on data obtained via cookies and similar techniques;
- to improve products and services. Based on information about your interests and your use of our products and services, Mediahuis tries to improve its products and services and to better tailor them to your use and interests.

The basis for the processing of your data for the foregoing purposes is consent. You give this consent through your privacy settings on a Mediahuis platform.

- in order to comply with the legislation and regulations applicable to Mediahuis, such as the retention obligation for the Dutch Tax Administration (Belastingdienst).

The basis for the processing of your data for the foregoing purposes is Mediahuis compliance with a legal obligation.

It is possible that when you use various Mediahuis products and/or services, your personal data processed in that connection may be combined with data originating from (the use of) other Mediahuis products and/or services and/or from third parties (as mentioned above under 'data received from third parties') to form a profile.

### Transfer of data to third parties

For the aforementioned purposes, your personal data may be exchanged with or made available to all parts of the group of which Mediahuis is part (the Mediahuis group). Your data will not be provided to parties that are not part of the Mediahuis group, with the exception of the following. Of course, we will take into account any required consents for such provisions.

#### *Performance of a contract*

If providing data to a third party is part of the contract you entered into with Mediahuis, we will provide your data to the relevant third party in accordance with the contract.

#### *Parties engaged by Mediahuis*

Your data may be provided to parties without your consent, which parties are engaged by Mediahuis for the performance of its services. These include providers of delivery and payment services, software and SaaS (Software as a Service) services, (advertising) platforms, hosting services, (direct) marketing services and collection agencies. In such a case, your data will only be used on Mediahuis instructions for the purposes referred to in this statement.

### *Provision for the purpose of advertisements*

To be able to offer advertisements as targeted as possible, the information that Mediahuis collects on its platforms regarding your browsing behaviour, including personal data, is combined with information about your browsing behaviour on the platforms of affiliated companies that are also part of the Mediahuis group, for the compilation of collective group profiles. These collective group profiles are used to show you personalised ads on the platforms of Mediahuis and these affiliated companies. Mediahuis is jointly responsible with these affiliated companies for the processing of your personal data for this purpose. This privacy statement applies to such processing. You can contact Mediahuis to exercise your rights in respect of this data (as referred to under 'your rights in respect of your data' below).

Also, Mediahuis sends certain information, such as IP address, to media agencies, advertisers, advertising networks and/or data partners for the purpose of the (automatic) sale of advertising space, and the group profiles compiled by Mediahuis using your data can be provided to media agencies, advertisers, advertising networks and/or data partners of Mediahuis for the display of personalised advertisements.

In addition, Mediahuis can match your data (e.g. your email address) with data in possession by a third party (e.g. an advertiser), to show you personalised ads on our platforms. Mediahuis is jointly responsible with the relevant third party for the processing of your personal data for this purpose. This privacy statement applies to such processing. You can contact Mediahuis to exercise your rights in respect of this data (as referred to under 'your rights in respect of your data' below).

### *Mandatory provision*

Lastly, it is possible that Mediahuis is required, based on applicable laws and regulations, to provide certain data, to the police for example, in connection with a criminal investigation or to a third party if the content of a comment posted by you on a Mediahuis platform is unlawful vis-à-vis that third party. In these instances, Mediahuis will only provide data if it is clear that it is obliged to do so.

### *Provision for advertising sales*

Mediahuis cooperates with affiliated parties who, like Mediahuis, are part of the Mediahuis group in the field of selling advertisements in their media. In that context, (personal) data of (potential) business customers are shared between these affiliated parties. This processing is subject to the provisions of this privacy statement. You can contact Mediahuis to exercise your rights in respect of these data (as mentioned below under 'your rights and in respect of your data').

### *Mandatory disclosure*

Finally, Mediahuis may be obliged under applicable laws and regulations to provide certain data, for example to the police in the context of an investigation or to a third party if the content of an expression posted by you on a Mediahuis platform is unlawful vis-à-vis that third party. Mediahuis will only provide data in these cases if it is clear that it is obliged to do so.

### *Transfer outside the EU*

Some of the parties to whom we provide data are international companies. In that case, it is possible that your data will also be processed outside the EU. In principle, this will only be done in countries with an appropriate level of protection. If that is not the case, Mediahuis will safeguard the protection of your data by using the standard contractual clauses drawn up for this purpose by the European Commission. A copy of these standard contractual clauses, including information on a specific processing that occurs under the application of these clauses, can be requested free of charge via [privacy@mediahuis.nl](mailto:privacy@mediahuis.nl).

### **Data processing by third parties via Mediahuis platforms**

Third parties may also place cookies and similar technologies via Mediahuis platforms and use them to collect your

data. These third parties may be advertisers that purchase advertising space on Mediahuis platforms and social media parties that offer certain services on Mediahuis platforms (such as the share button). In addition, you may end up on the platform of a third party via a Mediahuis platform, for example via an (embedded) link. In all these instances, the conditions and privacy rules of the relevant third party are applicable. You are advised to consult this third party's privacy statement.

You can find more information about cookies and similar technologies and the use thereof by third parties via Mediahuis' platforms on the relevant platform.

### Telephone calls to customer service

Telephone calls to the customer service of (a part of) Mediahuis may be recorded for verification of the agreement and for training purposes. The basis for this processing is a legitimate interest. The recordings will not be retained any longer than is strictly necessary and are not accessible to unauthorised persons.

### Job Application

When you apply for a vacancy at Mediahuis, Mediahuis processes your data, including name and address data, contact details and application data, in the context of the recruitment and selection procedure. The basis for, this processing is a legitimate interest to carry out the application process. Mediahuis stores this data for up to 4 weeks after the end of the recruitment and selection procedure. If you give permission for this, Mediahuis will store the data for up to 1 year after the end of the procedure.

### Retention period

Mediahuis processes the collected data as long as this is necessary for the purposes for which the data were collected or is necessary to comply with legal obligations. For example, customer data are retained until two years after the end of the customer relationship. In addition, Mediahuis is legally required to retain invoicing and payment data for seven years under tax legislation.

### Security of data

Mediahuis respects the privacy of every data subject and ensures that personal data are treated confidentially and with the greatest possible care. All personal data are securely stored in Mediahuis administration. Mediahuis also makes reasonable efforts to secure its systems against loss and/or against any type of unlawful use or processing and when doing so, uses appropriate technical and organisational measures, including taking the state of the art into account.

### Your rights in respect of your data

Below, we list the rights you can exercise in respect of your personal data that Mediahuis processes. You can exercise these rights via [this page](#).

#### *Right to access, rectification or erasure of personal data, right of objection and restriction*

You can gain access to your data that Mediahuis processes at all times and free of charge and, if you so desire, have these data modified or supplemented if they are incorrect or incomplete. In certain instances, you can also have your personal data erased, for example if these are no longer necessary for the purpose for which they were provided. You can also object to the use of your personal data or revoke consent given previously. In some instances, you can have the use of your data suspended temporarily, for example if there is uncertainty about the accuracy of the data.

#### *Right to data transfer*

You can request the data that Mediahuis automatically processes with your permission or in connection with the performance of your contract with Mediahuis or (if technically possible) have them transferred to another party.

### *Right of complaint*

If you have a complaint related to the processing of your personal data, you can report this via [privacy@mediahuis.nl](mailto:privacy@mediahuis.nl). You can also use this email address to contact Mediahuis data protection officer. You can also report your complaint to the Dutch Data Protection Authority.

### **Please note:**

If you want to unsubscribe for a certain newsletter or commercial e-mail of a brand of Mediahuis you can use the unsubscribe link which can be found at the bottom of the received mailing.

### **Amendment of this privacy statement**

Mediahuis reserves the right to amend this privacy statement. Every amendment will be published on this page. We recommend that you consult this privacy statement on a regular basis to ensure that you are always aware of the content of the applicable privacy statement.

*This privacy statement was last amended on October 10, 2023.*