

WEBSITE PRIVACY AND COOKIE POLICY

altacredit

direct-credit

direct-credit is a registered trade name of Altacredit B.V.

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## **WEBSITE PRIVACY AND COOKIE POLICY DATED 1 JUNE 2024**

### **Who we are**

1. Altacredit B.V. ("Altacredit" or "we" or "our") controls the processing of personal data by means of and via [www.direct-credit.nl](http://www.direct-credit.nl) and/or [www.altacredit.nl](http://www.altacredit.nl) and is considered the controller as referred to in the European General Data Protection Regulation.

### **What this policy applies to**

2. This Website Privacy and Cookie Policy applies when you visit and use our websites [www.direct-credit.nl](http://www.direct-credit.nl) and/or [www.altacredit.nl](http://www.altacredit.nl) (the "Website"). If you would like to view the privacy policy that provides information about how your personal data is used in relation to loans sought or entered into via the Altacredit Platform, please see our Loan Privacy Policy.

### **What is personal data?**

3. Personal data is any information that is about you or that can be used to identify you. This includes, for instance, your name, address, email address, and online or device information like IP addresses.
4. A list of the personal data that we collect, use and manage is set out in section below.

### **When do we collect your personal data?**

5. We collect personal data about you when:
  - You visit our Website, e.g. click on links or download content. We may also collect information when you open or click on links in our email communications.
  - You create or update a user account.
  - You communicate with us by email, over the phone, by post, through our Website or related social media platforms, via your account profile or using any other method. We also record all telephone calls and record your phone number.
  - You make a complaint or give feedback. This includes any data you share with us or that we receive as part of our investigation into your feedback or complaint.

### **What personal data do we collect?**

6. When you visit the Website you do not have to provide any personal data. In that case we will only receive certain technical information that is necessary to operate the Website. This section of our policy describes the categories of information collected by us, whether collected automatically, or provided voluntarily by you.
7. Information collected automatically via cookies:
  - your IP address;
  - the internet browser and device you use; and
  - the date and time you visit, and how you use our website and access its content.
8. Information provided by you:
  - account information such as your name, address, country of residence and date of birth;
  - authentication details such as your email address, password or other data used to secure the access to your account;
  - correspondence from you; and
  - information in relation to loans as governed by the Loan Privacy Policy.

### **On what grounds do we use your personal data?**

9. We collect your personal data pursuant to the agreement we have with you to offer our services and our legitimate interests to offer access to the Website and tailor it to the interests of the visitors. If your interests, fundamental rights or freedoms override our interests to use it, we will not collect or use your personal data.
10. We specifically use your personal data to do the following:
  - Communicate with you, such as to respond to any correspondence and to contact you when we need to provide you with information about our services;
  - Maintain the security of your account, our Website and our services;
  - Protect you, us and third parties against misuse of our Website and related services, and against other illegal behavior, including fraud or other crime, and to investigate circumstances of such inappropriate behavior;
  - Improve our products and services and their performance by tracking your use of them through data analytics, models and algorithms;
  - Maintain the quality of our services; and

- Conduct market research, analysis and learn about preferences. We do this to test and evaluate our existing products and research potential new services.

#### **With which parties is personal data shared?**

11. Where lawful we may share your personal data with third parties on a need to know basis, for instance to help us ensuring that our Website is safe to use, when we are required to do so by law, or when we're asked to respond to requests from law enforcement agencies or regulators, or under other extenuating circumstances, such as if we need legal advice.
12. To be able to offer the Website, we may be required to transfer your personal data outside of the European Economic Area. If this is the case, we will make sure to have adequate measures in place to transfers your personal data lawfully.

#### **How long do we keep your information?**

13. We only store your personal data in an identifiable form as long as necessary to comply with the purpose for which they were collected or because we are legally required to do so. Generally, this means that your personal data is retained until you delete your account.

#### **What rights do you have in relation to your personal data?**

14. We ask you to help us ensuring that all personal data we process is relevant, accurate and correct.
15. You may contact Altacredit to enforce all rights granted to you under the European General Data Protection Regulation, including the right to access, amend or erase your personal data, object to the processing of your personal data where we rely on legitimate interests as the basis for processing your personal data, and lodge a complaint with your local supervisory authority. Should we rely on your consent, you may withdraw your consent at any time.

#### **What are cookies?**

16. Cookies are small text files that websites place on your computer's or mobile device's web browser. These cookies store information about the content that you viewed and how you interact with the website, for instance to remember your preferences and settings, and analyse how you use our online services.

#### **What cookies do we use?**

17. Our Website only uses strictly necessary cookies which are used to provide the services that you have specifically asked for on our Website and are essential to enable you to move around our Website and use its features, such as logging into your account.

18. The Website uses two types of cookies:

##### **Functional cookies**

Functional cookies are cookies used to ensure that the Website operates smoothly. Without them the Website would not work properly and therefore these must be enabled. Functional cookies enable our Website to work properly, so you can create an account, sign in and manage your account. These cookies are also used to remember your settings, for example the language in which the Website is shown. We do not need to obtain consent to use functional cookies. These cookies have a limited lifespan, generally [<sup>\*\*</sup> months].

##### **Analytical cookies**

Analytical cookies enable us to analyse the use of the Website. This allows us to improve the Website, making it more pleasant for you to use and easier for you to find what you are looking for. The data we gather through these cookies can include which web pages you have viewed, which referring/exit pages you have entered and left from, and which platform type you have used. It also means we can use details about how you've interacted with the Website, such as the number of clicks you make on a given screen, your mouse movements and scrolling activity, the search words you use and the text you enter into various fields. These cookies have a limited lifespan, generally [<sup>\*\*</sup> months].

19. To learn more about cookies and how to manage or delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or the help section of your browser. If you choose to block certain functional cookies, you may not be able to use some features of our Website.

#### **Updates to this policy**

20. We may update the Website Privacy and Cookie Policy from time to time. We will do this when we update the categories of personal data that we collect, the purposes for which we process such data or the ways in which we share your personal data.

21. If we make any significant changes to how we use your personal data, we will notify you of the changes before putting them into effect.

### **Contact Us**

22. If you have any questions regarding your personal data, or if you would like to exercise your rights, please feel free to contact us at [info@direct-credit.nl](mailto:info@direct-credit.nl) or [info@altacredit.nl](mailto:info@altacredit.nl).
23. Last updated: 1 June 2024