

PRIVACY POLICY

Version 1.2 | Effective Date: April 1, 2025 | Classification: INTERNAL

1. INTRODUCTION

This Privacy Policy describes how TNO collects, uses, stores, shares, and protects personal information. We are committed to protecting the privacy and security of your personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

2. DATA COLLECTION

2.1 Types of Personal Data We Collect

1. We collect the following types of personal information:

- Contact information (name, email address, phone number, address)
- Account credentials (username, password)
- Employment information (job title, department)
- Device and browser information (IP address, browser type, operating system)
- Usage data (features accessed, actions performed, timestamps)
- Communications data (emails, chat messages, support requests)

2. Special categories of personal data (sensitive data) are only collected with explicit consent or when legally required.

2.2 Methods of Data Collection

1. Direct collection when you:

- Create an account
- Use our services
- Fill out forms
- Communicate with us

- Participate in surveys or events

2. Automated collection through:

- Cookies and similar technologies
- Server logs
- Analytics tools

3. DATA PROCESSING

3.1 Purposes of Processing

1. Your data is processed according to the following principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality

2. We process personal data for the following purposes:

- Providing and maintaining our services
- Account management
- Authentication and security
- Improving and personalizing user experience
- Analytics and research
- Customer support
- Legal compliance and enforcement

3.2 Legal Basis for Processing

1. We process personal data based on the following legal grounds:

- Contractual necessity (to provide services)
- Legitimate interests
- Legal obligation
- Consent (where applicable)

4. DATA SHARING AND TRANSFERS

1. We may share personal data with:

- Service providers and subprocessors
- Affiliated companies
- Legal authorities when required by law
- Third parties with your consent

2. International data transfers:

- When personal data is transferred outside the EEA, appropriate safeguards are implemented
- Such transfers are subject to standard contractual clauses or adequacy decisions

5. DATA SECURITY

1. We implement appropriate technical and organizational measures to protect personal data, including:

- Encryption of data in transit and at rest
- Access controls and authentication
- Regular security assessments
- Staff training on data protection
- Incident response procedures

6. DATA RETENTION

1. We retain personal data only for as long as necessary to fulfill the purposes for which it was collected

2. Retention periods are determined based on:

- Legal and regulatory requirements
- Contractual obligations
- Business needs
- User preferences

7. YOUR RIGHTS

1. You have the right to access and delete your personal data
2. Additional rights include:
 - Right to rectification
 - Right to restriction of processing
 - Right to data portability
 - Right to object to processing
 - Right to withdraw consent
 - Right to lodge a complaint with a supervisory authority

8. COOKIES AND TRACKING

1. We use cookies and similar technologies to:
 - Provide essential functionality
 - Analyze usage patterns
 - Remember preferences
 - Improve user experience
2. You can manage cookie preferences through your browser settings

9. CHILDREN'S PRIVACY

1. Our services are not intended for children under 16
2. We do not knowingly collect personal data from children
3. If we discover we have collected personal data from children, we will delete it promptly

10. CHANGES TO THIS POLICY

1. This Privacy Policy may be updated periodically
2. Significant changes will be notified to users
3. The latest version will always be available on our website

11. CONTACT INFORMATION

For privacy-related inquiries or to exercise your rights, contact:

Data Protection Officer

TNO Information Security

Email: privacy@tno-example.com

Address: 123 Security Street, 10101, Amsterdam, Netherlands

APPROVED BY:

Maria Chen, Data Protection Officer

Date: April 1, 2025