

# PRIVACY POLICY



ZAKELIJKETELEFOON  
NUMMERS.NL

## 1. Who are we?

This privacy policy applies to the processing of personal data by Zakelijketelefoonnummers.nl, located at Suikersilo-Oost 1, 1165 MS Halfweg, the Netherlands, registered with the Dutch Chamber of Commerce under number KVK 52963284. Zakelijketelefoonnummers.nl is a provider of business telecommunication services.

We act as the data controller for the personal data of our business relations, such as contact persons at customers, suppliers, and partners.

## 2. Contact details

For privacy-related questions, you can contact our Data Protection Officer:

Zakelijketelefoonnummers.nl

Attn. Data Protection Officer

E-mail: [dpo@zakelijketelefoonnummers.nl](mailto:dpo@zakelijketelefoonnummers.nl)

## 3. What data do we process?

We only process personal data that is necessary for providing our Services, fulfilling contractual and legal obligations, and for communication with business relations. This includes:

- First and last name
- Position or role within the organization
- Business contact details (email address, phone number, work address)
- Login details and usernames for our portals (if applicable)
- Communication history (e.g., emails, phone calls)
- Billing data linked to a natural person

We do not process special categories of personal data and focus exclusively on business users.

#### **4. Purposes and legal bases**

We process personal data for the following purposes:

- Execution of agreements with our customers and suppliers
- Communication about products, services, and contracts
- Administrative processing and invoicing
- System and access security
- Compliance with legal obligations, such as fiscal retention requirements

The processing is based on the following legal grounds under the GDPR:

- Performance of a contract (Article 6(1)(b))
- Legal obligation (Article 6(1)(c))
- Legitimate interest (Article 6(1)(f)), for example for relationship management or network security

#### **5. Recipients and data transfers**

We only share personal data with:

- Sub-processors who provide technical or administrative support on our behalf (such as SpeakIntelligence B.V., our platform provider)
- Our accountants, legal advisors, or regulators if legally required

Data is only processed within the European Economic Area (EEA) or in countries with an adequate level of protection in accordance with Article 45 GDPR.

There is no transfer of data to third parties for commercial purposes.

#### **6. Retention periods**

We do not retain personal data longer than necessary for the purpose for which it was collected. In most cases, we apply the following retention periods:

- Contact details: up to 2 years after the end of the business relationship
- Billing and transaction data: 7 years (statutory retention obligation)
- Access or log data: up to 1 year, unless longer is required for security or audits

After the retention periods have expired, the data will be carefully deleted or anonymized.

#### **7. Your rights**

Under the General Data Protection Regulation (GDPR), you have the following rights with respect to your personal data, subject to conditions:

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to erasure (“right to be forgotten”) (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)
- Right to object to processing (Article 21 GDPR)
- Right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) (Article 77 GDPR)

Requests will only be processed if we can establish the identity of the requester with reasonable certainty. If we have doubts about your identity, we may request additional information as provided in Article 12(6) GDPR.

Requests that are manifestly unfounded or excessive, particularly due to their repetitive character, may be refused or subject to a reasonable administrative fee (Article 12(5) GDPR).

We only process requests that are submitted in writing and with justification via the official contact channel:

**[dpo@zakelijketelefoonnummers.nl](mailto:dpo@zakelijketelefoonnummers.nl)**

We reserve the right to decline requests if:

- we do not process any personal data relating to you;
- the request conflicts with a legal obligation;
- or an exemption applies under Article 23 GDPR.

You will generally receive a substantive response to your request within one month. In exceptional cases, this period may be extended by two months, provided that you are informed within the original period.

## **8. Security**

We take appropriate technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, disclosure, and alteration. These include access management, logging, encryption, and secure hosting within the EEA.

## **9. Changes**

We reserve the right to amend this privacy policy if required by law or regulation, or if our business operations give reason to do so. You will always find the most up-to-date version on our website.