



# PRIVACY STATEMENT, EUROPE

Effective June 09, 2019

This Privacy Statement describes how BlueBee Holding BV, a private limited company incorporated under the laws of the Netherlands, with registered offices at Laan van Zuid Hoorn 57, 2289 DC Rijswijk (the Netherlands) processes your personal data when offering their services.

BlueBee endeavours to process your personal data in compliance with the European Regulation (EU) 2016/679 **of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC** (General Data Protection Regulation or “GDPR”) and any other applicable data protection law.

BlueBee reserves the right to update this document from time to time. You are therefore kindly advised to regularly check this document.

Please note that you can visit BlueBee’s website without providing any personal data to BlueBee. In that case, BlueBee will only collect limited anonymous statistical data in relation to the general use of its website (e.g. the number of visitors, the amount of data traffic, etc).

## 1. How does BlueBee use your personal data?

BlueBee processes personal data for various purposes. Below you will find a detailed description of each purpose.

### 1.1 Client management related purposes

BlueBee may process your personal data for client management purposes and for entering into contact with you, such as:

- Contacting you following a request (necessary for the performance of the contract or precontractual measures) (legitimate interest, i.e. the freedom to undertake)

If you contact BlueBee in person or through the contact form, BlueBee processes your personal data to enter in contact with you and/or your relevant employees. If your request has a general nature, the legal ground is consent or legitimate interest. If your request relates to a quote, the legal ground is contractual necessity. The personal data processed for this purpose includes identification data, personal characteristics (e.g. gender) and contact details (e.g. name, address, phone number, e-mail address, etc). The personal data will be stored for a period of 5 years.

- Client management purposes (legitimate interest, i.e. the freedom to undertake) (necessary for the performance of the contract), including the creation and management of user accounts If you create an account and if you execute an agreement with BlueBee, BlueBee will process your personal data and/or the personal data of your employees for client management purposes and for the performance of the agreement. The personal data processed for this purpose includes identification data, personal characteristics (e.g. gender), contact details (e.g. name, address, phone number, e-mail address, etc) and financial data. The legal ground is contractual necessity. The personal data will be stored for a period of 10 years following termination or expiry of the agreement.
- Improving its services and analyzing general trends (legitimate interest, i.e. the freedom to undertake):  
BlueBee processes personal data to improve its service and to analyze general trends in relation to the use of its services. The personal data processed for this purpose includes identification data and contact details (e.g. name, address, phone number, e-mail address, ...) and (meta)data in relation to your use of BlueBee's services (e.g. number of analyses run, input file sizes, ...). The legal ground for this processing is BlueBee legitimate interest (i.e. the freedom to undertake). The personal data will be stored for a period of 5 years.

## 1.2 Supplier management purposes

BlueBee processes personal data for supplier management purposes, such as:

- Contacting you (necessary for the performance of the contract or precontractual measures):  
If you contact BlueBee in person or through the contact form as a (prospective) supplier, BlueBee processes your personal data to enter in contact with you and/or your relevant employees. If your request has a general nature, the legal ground is consent or legitimate interest. If your request relates to a quote, the legal ground is contractual necessity. The personal data processed for this purpose includes identification data, personal characteristics (e.g. gender) and contact details (e.g. name, address, phone number, e-mail address, ...). The personal data will be stored for a period of 5 years. For quote related processing, the personal data will be stored for a period of 10 years.
- Managing (prospective) suppliers (legitimate interest, i.e. the freedom to undertake) (necessary for the performance of the contract)  
If you are a (prospective) supplier BlueBee shall process personal data to manage its relationship with you and your employees. The personal data processed for this purpose

includes identification data, personal characteristics (e.g. gender), contact details, professional data and financial data. Your personal data may be obtained from third parties, such as your employer, or through public websites (e.g. LinkedIn). The personal data shall be stored for a period of 10 years following the termination or expiry of our contractual relationship.

### 1.3 Commercial communication

BlueBee may send you commercial information about BlueBee and its service offerings, either by e-mail, by telephone or by ordinary mail.

If you have opted-in to receive commercial communication from BlueBee, the legal ground is consent. If you are an existing client of BlueBee, the legal ground may be consent (if you opted in) or legitimate interest (if you did not opt in or if consent is not legally required otherwise). The legitimate interest of BlueBee is the freedom to undertake.

The personal data processed for this purpose includes identification data, personal characteristics (e.g. gender) and contact details (e.g. name, address, phone number, e-mail address, ...). Your personal data may be (partially) obtained from third parties, such as your employer, or through public websites (e.g. LinkedIn). This information shall be kept by BlueBee for a period of 5 years following the last meaningful contact.

### 1.4 Statistical and research purposes

BlueBee may process pseudonymized genomic data processed by means of its platform for statistical and research purposes and product improvement purposes. Such processing will be limited to generating aggregated statistical data which may subsequently be used by BlueBee for its own purposes, e.g. for product improvement purposes.

The legal ground of this processing is BlueBee's legitimate interest derived from the freedom to undertake.

The aggregated statistical result is anonymous data and therefore no longer subject to the GDPR.

## 2. Data transfers

Personal data may be transferred to recipients in the United States of America. In that case, BlueBee shall ensure that appropriate safeguards are in place prior to transferring the personal data, either because the recipient has been certified against the EU/US Privacy Shield or by implementing standard contractual clauses approved by the European Commission for the transfer of personal data.

## 3. Recipients of the personal data

BlueBee may share your personal data with other recipients such as:

- Other entities within the BlueBee group
- Individuals within your own organisation (i.e. your employees, consultants and advisors)
- Banks and payment service providers
- Processors that provides BlueBee with services within the context of a data processing agreement and with the unique aim to provide assistance to BlueBee
- Police and other law enforcement authorities, as BlueBee might be legally compelled to disclose information as part of an investigation or judicial proceedings
- Partners with whom BlueBee is working to improve and diversify its services

## 4. What rights do you have regarding the processing of your personal data?

The GDPR grants you a number of rights (data subject rights). You have a right:

- To access and rectify your data
- To opt-out at any time, free of charge, of our processing for direct marketing purposes (“right to opt out of direct marketing”)
- To be forgotten, to the erasure and to the restriction of processing of your data
- To retract your consent at any time to the processing of your data
- To data portability
- To object to the processing of your personal data
- to be informed, in case of automated decision-making process, of the logic underlying the system and the importance and consequences envisaged by the processing for the person concerned

Exercising these rights may be subject to conditions. E.g. the right to retract your consent only applies for processing based on your consent and the right to object to processing for direct marketing purposes does not apply to our processing for the purpose of contract performance. BlueBee's data protection officer (DPO) may be contacted at any time to obtain further information about these legal conditions and restrictions.

You have the right to file a complaint with the Supervisory Authority (for the Netherlands, it is the Dutch Data Protection Authority). Before submitting any complaint with the Supervisory Authority, BlueBee kindly asks you to contact its DPO in order to seek a speedy and mutually acceptable solution.

## 5. Security

BlueBee has implemented an adequate system of protection of your personal data. These measures include adequate technical and organisational measures required to protect your personal data against the accidental or unauthorised destruction, accidental loss as well as against any alteration, access or any other unauthorised process of your personal data. Nevertheless, no security system can guaranty 100% of security. BlueBee remains at your disposal should you have any questions relating to the confidentiality and the safety of your personal data.

You also have an important role in keeping your personal data secure. If you have created an account on BlueBee's platform, you have to choose a sufficiently strong password and you have to keep your credentials and password confidential at all times.

## 6. How to contact BlueBee

You may contact BlueBee at the following address:

BlueBee Holding BV  
57 Laan van Zuid Hoorn  
2289 DC Rijswijk  
The Netherlands  
[info@bluebee.com](mailto:info@bluebee.com)

If you have a specific request related to this privacy statement or to data protection in general, or if you wish to exercise any right granted to you, feel free to contact BlueBee's data protection officer:

Name: Elena Popa  
Email address: [compliance@bluebee.com](mailto:compliance@bluebee.com)