



## Horizon Telecom Privacy Policy

The Horizon Telecom Privacy Policy describes the privacy practices of Horizon Telecom and applies wherever we display or reference this policy.

Horizon Telecom BV, with its registered office at Boylestraat 38A in (6718 XM) Ede, the Netherlands, is a professional IT service provider. Your relationship is with Horizon Telecom BV, which is responsible for processing your personal information collected by Horizon Telecom, and the laws of the Netherlands apply.

When offering our data and telecommunication services, we process personal data.

Processing personal data is technically necessary for our service provision.

This Privacy Statement sets out how Horizon Telecom handles the personal data it processes. It also sets out the purposes for which we process personal data and your rights as a data subject.

If you wish to use our services, you acknowledge that Horizon Telecom may transfer your personal information abroad and to other countries where Horizon Telecom and their partners and suppliers operate, including the United States. The privacy protections and permissions for accessing your data in these countries may differ from your country. We transfer your personal data to these countries where this is permitted by law and we take measures to ensure that your personal data is appropriately protected.

Who is responsible for the processing of your personal data?

Horizon Telecom provides its services directly to the users of its registered services.

Horizon Telecom is responsible for the data collected when providing its services and it is a controller within the meaning of the General Data Protection Regulation ("GDPR").

### Contact information

Horapark 3  
6717 LZ Ede  
The Netherlands  
+31(0)20-2261500

<https://www.horizontelecom.nl/>

Our Data Protection Officer can be contacted at [meldpunt@horizontelecom.nl](mailto:meldpunt@horizontelecom.nl).

### Which personal data do we process?

Horizon Telecom processes personal data when our services are used and/or because data are disclosed to Horizon Telecom.

Here are the types of information we collect:

- **Information You Give Us:** we receive and store any information you provide in relation to Horizon Telecom services.. You can choose not to provide certain information but then you might not be able to take advantage of many of our Horizon Telecom services.
- **Automatic Information:** we automatically receive and store certain types of information when you use Horizon Telecom services, such as information about your use, including your interaction with services available through Horizon Telecom services. Like many service providers with websites, we use "cookies" and other unique identifiers and we obtain certain types of information when your web browser or device accesses Horizon Telecom services and other content served by or on behalf of Horizon Telecom on other websites.
- **Information From Other Sources:** we might receive information about you from other sources, such as updated delivery and address information from other carriers, which we use to correct our records.

The overview below shows the personal data that Horizon Telecom processes:

- First and last name;
- Sex;
- Address;
- Telephone number;
- Email address;
- IP address;
- Other personal data that are actively disclosed to us, for example by filling out a contact form on our website, or uploading a resume when responding to a vacancy, or by correspondence or telephone;
- Information about activities on our websites and portals;
- Web browser and device type;
- Bank account number if we send invoices or if invoices are sent on our behalf or if payments are being made;
- Data about purchased services if these are recorded in our systems for our service provision;
- Data on calls that are charged and/or displayed by our systems for our service provision.

### Minors

Our website and/or service does not intend to collect data of visitors to our website who are 16 years old or younger, unless they have the permission of their parents or guardian. However, we are unable to check whether a visitor is older than 16. We therefore advise parents to be involved in their children's online activities, in order to prevent personal data of minors being collected without their parents' consent. If you are convinced that we have collected personal data of a minor without such consent, please contact us at [meldpunt@horizontelecom.nl](mailto:meldpunt@horizontelecom.nl), and we will remove those data.

### EU General Data Protection Regulation – Legal Basis

The EU GDPR requires a legal basis for our use of personal information. Our basis varies depending on the specific purpose for which we use personal information. We use:

- Performance of a contract when we provide you with products or services, or communicate with you about them. This includes when we use your personal information to take and handle orders, deliver products and services, and process payments.



- Our legitimate business interests and the interests of our customers when we improve Horizon Telecom services (including when we use your voice, video, or camera input to improve services), when we detect and prevent fraud and abuse in order to protect the security of our customers, ourselves, or others.
- Your consent when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.
- Compliance with a legal obligation when we use your personal information to comply with laws. For instance, we collect seller place of establishment and bank account information for identity verification purposes.
- These and other legal bases depending on the purpose for which we use personal information.

When you provide consent as required or otherwise consistent with your choices, we may send you information about Horizon Telecom products and services, special offers and similar information, and share your information with third parties for their own marketing purposes.

We may place cookies or use similar technologies in our services and in email communications, in accordance with our cookie policy and the information you receive when these technologies are used. We may access data stored on your device regarding your use and interaction with services and analyse your use and navigation of the using techniques such as machine learning to detect and prevent fraudulent, deceptive or illegal activities or misuse of the services and to improve our services and the user experience. On other occasions where we ask your consent, we will use the data for the purposes we explain at that time. In cases where your consent is required to process data, you may withdraw your consent to such activities at any time. If the content or data you store in Horizon Telecom services contains personal information of other people, you must be legally permitted to disclose that personal information to Horizon Telecom. Wherever we rely on your consent, you can always withdraw that consent, although we may have other legal grounds for processing your data for other purposes. In some cases we may send you direct marketing without your consent, relying on our legitimate (care and duty) interests. You have the absolute right to opt out of direct marketing, or profiling that we carry out for direct marketing, at any time by update your preferences in your Horizon Telecom ID profile;

Update your preferences in your specific website or accounts; clicking the 'Unsubscribe' link at the bottom of our marketing emails; or contact us using the details provided within this privacy policy.

Where we process your data on the basis of legitimate interests, you can object to this processing in certain circumstances. In such cases, we will stop processing data unless we have compelling legitimate (care and duty) grounds to continue processing or where it is necessary for legal reasons.

If legitimate interest is not a valid legal basis in a particular jurisdiction, we will carry out the processing activities described above in reliance on a legal basis that is valid in that specific jurisdiction.

For legal reasons, we may disclose personal data in response to requests from governments or law enforcement agencies conducting an investigation, or use or disclose information as reasonably necessary to detect, prevent, or otherwise address



fraud, security vulnerabilities, potentially deceptive or illegal activities, misuse of the services, or technical issues, to protect both you and Horizon Telecom.

Where such processing and disclosures are not strictly required by law, Horizon Telecom may rely on their legitimate interests, if available, and those of the third parties described above.

Third-party data controllers may also use Horizon Telecom products and services to collect and process your personal data. If you use an email address associated with a corporate domain (such as yourname@companyname.com) to access the Horizon Telecom services or have been invited by a company to use the services, we may provide your personal information to that company.

We will disclose personal information to companies that help us operate our business to detect, prevent, or otherwise address fraud, deception, illegal activities, misuse of Horizon Telecom services, and security or technical issues.

In addition, we will disclose personal information to companies, organizations, government agencies, or individuals outside of Horizon Telecom if we have a good faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to prevent such fraudulent, deceptive, or illegal activity, misuse of our services, and detect, prevent or otherwise address software, security or technical issues. We also do this when reasonably necessary to protect against harm to the rights, property, or safety of Horizon Telecom and our employees, our users, children, or the public, as required or permitted by law.

We also disclose your personal information to companies we engage to process personal information on Horizon Telecom's behalf for the above purposes. Such companies (including companies that may record or store communications) include providers of customer support services, chatbots, providers of analytics technologies that track your record and analyse interactions with our websites to help us improve your experience, technology providers for artificial intelligence that records and analyses your content or communications, payment processing services, fraud monitoring and prevention, detecting and preventing deceptive or illegal activities or misuse of our services, email, social media and other marketing platforms and service providers, and hosting services.

Horizon Telecom may also disclose your personal information when you agree to allow us to do so, when we have a good faith belief that we are required to provide information in response to a subpoena, court order, or other applicable law or legal process (learn more) or in response to an emergency involving danger of death or serious bodily injury. If we merge with or are acquired by another company, if we sell an Horizon Telecom business unit, or if all or a substantial portion of our assets are acquired by another company, your information is likely to be disclosed to the potential buyer, our advisors and any advisors of a potential buyer and become one of the assets transferred to the new owner.

We may disclose or publish aggregated information that does not specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use our services.

### **Purposes for which Horizon Telecom processes your personal information**

We process your personal information to operate, provide, and improve the Horizon Telecom services that we offer our customers. These purposes include:



- Delivery of services. We use your personal information to provide our services, process payments, and communicate with you about orders, products and services, and promotional offers.
- Provide, troubleshoot, and improve Horizon Telecom services. We use your personal information to provide functionality, analyse performance, fix errors, and improve usability and effectiveness of the Horizon Telecom services.
- Recommendations and personalisation. We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalise your experience with Horizon Telecom services.
- Provide voice, image and other telecommunications services. When you use voice, image and camera services, we process your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our Horizon Telecom services.
- Fraud prevention and credit risks. We process personal information to prevent and detect fraud and abuse in order to protect the security of our customers, Horizon Telecom Europe, and others. We may also use scoring methods to assess and manage credit risks.
- Comply with legal obligations. In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from sellers information regarding place of establishment and bank account information for identity verification and other purposes.
- Communicate with you. We use your personal information to communicate with you in relation to Horizon Telecom services via different channels (e.g., by phone, email, chat).
- Purposes for which we seek your consent. We may also ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

### Automated decision-making

Horizon Telecom does **not** decide on matters that may have serious personal consequences

on the basis of automated processing, i.e. decisions that are made by computer programmes or systems without the intervention of a human being (for example an employee of Horizon Telecom).

### How long do we retain personal data?

Horizon Telecom does not retain personal data longer than is strictly necessary for the purposes for which the personal data are collected. The data retention policy contains a list of purposes and periods.

### Sharing personal data with third parties

Horizon Telecom shares your/the personal data with various third parties if this is necessary in order to perform the agreement and to comply with any legal obligations. We conclude processing agreements with any companies we instruct to process your data. This is to ensure the same level of protection and confidentiality of your data. Horizon Telecom will remain responsible for these processing operations.

### Cookies or similar technologies we use

Horizon Telecom uses only technical and functional cookies, and analytical cookies that do not infringe your privacy. Cookies are small text files that are stored on your



computer, tablet or smartphone the first time you visit this website. The cookies we use are necessary to ensure the technical operation of the website and your ease of use. They ensure the proper functioning of the website and remember your preferred settings, etcetera. We can also use them to optimise our website. You can disable cookies by changing the settings of your internet browser so that it no longer stores cookies. It is also possible to delete all previously stored information via your browser's settings.

### Access to and rectification and erasure of data

You have the right to access, rectify or erase your personal data. You also have the right to withdraw any consent you have given for data processing, to object to Horizon Telecom's processing of your personal data. You also have the right to data portability. This means that you can ask us to transmit, in a computer file, your personal data in our possession to you or another organisation of your choice.

Requests for access to or rectification, erasure or transmission of your personal data or requests for withdrawal of your consent or objections to the processing of your personal data may be sent to [meldpunt@horizontelecom.nl](mailto:meldpunt@horizontelecom.nl). In some circumstances, Horizon Telecom may not be able to comply with your request (or part of it) as a data subject. This may be related to statutory retention periods or legitimate interests. If we cannot meet your request, we will explain why this is so.

To verify that it was really you who made the request for access, we will ask you to attach a copy of your ID to your request. Please redact your photo, MRZ (machine-readable zone, the strip containing numbers at the bottom of your passport), passport number and citizen service number (*BSN*) on this copy, in order to protect your privacy. We will respond to your request as soon as possible, but in any event within four weeks.

Horizon Telecom would also like to point out that you can submit a complaint to the national supervisory authority: the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*). You can do this via the following link:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

### How we protect personal data

Horizon Telecom takes the protection of your data seriously and takes appropriate measures to combat misuse, loss, unauthorised access, unwanted disclosure and unauthorised amendments. If you believe that your data are not properly protected or if there are signs of misuse, please contact our customer service or send an email to [meldpunt@horizontelecom.nl](mailto:meldpunt@horizontelecom.nl)

### How we handle job applications

To ensure that your job application proceeds as smoothly as possible, we would like to receive the following data from you:

- contact details (name, address, date of birth, telephone number, email address, etc.) ▪ availability
- detailed CV (including education and work experience)

By sending us your job application, you also consent to us performing an online screening as part of the application process (LinkedIn, etc.).

We do not transfer your data to third parties for commercial purposes. Only third parties that assist us in finding new colleagues may sometimes need to access all or part of your data. We make sure that these third parties handle your data with care and abide by the rules.



If you apply for a job, we receive your personal data. We retain these data for no more than four (4) weeks after the end of the application process unless you have given us your express consent to retain the data for a longer period. We will then retain your data for no more than one (1) year after the end of the application process. That will enable us to contact you in the future for any new, suitable job openings.

### **Amendments to the privacy statement**

Sometimes we need to update this privacy policy so that Horizon Telecom can adapt it to new technologies, industry practices, legal requirements, or for other purposes. The rules on personal data protection and our business operations are subject to change. Horizon Telecom therefore reserves the right to amend this privacy statement. If we do so, we will revise the “last updated” date at the top of this policy and post the revised policy on this page so that you are aware of the information we collect, how we use it, and under what circumstances we can make this public. The most recent privacy statement is always available on [www.horizontelecom.nl](http://www.horizontelecom.nl). We encourage you to periodically visit the website for the latest information about our privacy practices. In certain circumstances (for example, where certain material changes are made or where required by applicable privacy laws) we will notify you of these changes and, where required by applicable law, we will obtain your consent. We may notify you by email to you, by posting a notice of these changes in our services, or by other means consistent with applicable law.. This statement was last amended on 10 June 2024