# Data Privacy Policy Hummingbird Data Group B.V.

Hummingbird Data Group B.V. (hereinafter "Hummingbird") works with databases from renowned partners and customers. Working with and exchanging data and personal information obviously requires monitoring and compliance with all current legal rules and codes of conduct regarding privacy and security.

Privacy and security have been important to Hummingbird from the get-go. We work strictly in accordance with the Dutch and European legislation on the protection of personal data. Hummingbird only makes data available to customers who are active in the EU and must comply with the local (Dutch) and European legislation. This ensures that personal data is protected by the local (Dutch) and European rules and regulations.

The rights of consumers are guaranteed in the organization of Hummingbird. Hummingbird will always honor requests for the removal of personal data or access to the origin of data. Hummingbird's Privacy Officer always answers such questions as quickly as possible. Hummingbird's Privacy Officer can be contacted by e-mail at: privacy@hudagro.com

## GENERAL TERMS AND CONDITIONS

Our general terms and conditions are available upon first request via email to info@hudagro.com

## PRIVACY STATEMENT

### CONSENT
By using this site, you agree to the terms of this Privacy Statement. Whenever you submit information via this site, you consent to the collection, use and disclosure of that information in accordance with this Privacy Statement.

### COVERAGE
This policy covers how Hummingbird Data Group B.V. ("Hummingbird") treats personal information that Hummingbird collects and receives, including information related to customer past use of Hummingbird products and services. Personal information is information about customers, potential customers, Hummingbird website users, and others who may provide information that is personally identifiable, such as, name, address, email address, or phone number, and that is not otherwise publicly available. This policy does not apply to the practices of entities that Hummingbird does not own or control or to people that Hummingbird does not employ or manage.

### PERSONALLY IDENTIFIABLE INFORMATION COLLECTION AND GENERAL USE
Hummingbird may gather information related to the use of its products and services, registration of a user account on the Hummingbird website, or in the course of standard business practices. Personal identifiable information ("PII") is collected from such parties only after obtaining consent, which is obtained when such parties are prompted for information when requesting product information, downloading a trial version of a product, registering a new user account, registering a product, purchasing a product or service, or contacting customer support. Hummingbird may collect usage statistics to enable Hummingbird to improve user experience and allocate internal resources. Purchasing Hummingbird products or services requires a customer to provide certain personal information and enter into an agreement under the applicability of our general terms and conditions. Nothing herein is intended to modify the terms in such an agreement nor our general terms and conditions.

### INFORMATION SHARING AND DISCLOSURE
Hummingbird does not rent, sell, or share personal information that is provided to it, except when Hummingbird has obtained explicit permission, or under the following circumstances:

- Responses to subpoenas; court orders; or legal process; or to establish or exercise Hummingbird's legal rights or defend against legal claims.
- Personal information is transferred in the event the product or service is acquired in its entirety by another entity. Hummingbird shall issue a notification before information is transferred and becomes subject to a different privacy policy.

## INFORMATION COLLECTED DURING DATA PROCESSING

Information transmitted by users to the Hummingbird servers as part of data processing functions of its products or services is retained only to the limited extent necessary to complete the associated processing functions of the products or services.

## USER ACCOUNT INFORMATION USE

Hummingbird reserves the right to send certain communications relating to its products or services, such as service announcements, administrative messages, feedback requests that are considered part of routine technical support procedures.

## SECURITY

Hummingbird takes appropriate steps to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, whether in transmission or storage. All personnel are trained on the appropriate use of PII and they are kept trained with advances in personal security and best practices.

Hummingbird operates an up-to-date information security policy and is currently in due process to be certified in accordance with the ISO 27001 security standard.

Hummingbird's security measures include:

- Access control and authorisation of employees. All employees are obliged to maintain confidentiality
- Only use of secure server centres
- Use of processor agreements
- In-house Privacy Officer for questions from consumers and structural consultation with and advice from an independent data protection expert.
- Use of a secure environment for secure exchange of files

In the context of privacy and security, Hummingbird does not send or receive any data by e-mail. Hummingbird always uses a secure online transfer environment.

Hummingbird employees can create an account for you immediately, after which a username and password are provided to you via various channels. All in place to keep the data secure and the privacy guaranteed.

## CHANGES TO THIS PRIVACY POLICY

Hummingbird may update this privacy policy as necessary and shall post notifications regarding such updates on its website.