

Twelve Privacy Policy



Twelve B.V.
Twelve Sports & Hospitality B.V.
Twelve Events B.V.
Twelve Venues B.V.



Twelve Privacy Policy

Who are we and what do we do?

We are Twelve. Twelve consists of several divisions, namely: Twelve B.V., Twelve Sports & Hospitality B.V., Twelve Events B.V. and Twelve Venues B.V. (hereafter jointly called **Twelve, we** and **our**). At Twelve we make life easier for our customers with payment solutions, so they can offer an ultimate paying convenience (the **Services**) to their visitors. Our **Website** has offers more information about us and our Services: www.twelve.eu. One of our Services is **KNIP** (meaning small purse), with which visitors can easily pay cashless using a debit card, wristband or a ticket (hereafter jointly called: **Token**). Use can be made of KNIP via the KNIP APP (the **APP**) and via the online platform: www.mijnkniponline.nl.

Twelve attaches great importance to protecting your privacy and security of your personal data. This **Privacy Policy** explains what kind of personal data is collected via our Website and Services. It also explains the purposes for which personal data is used, how it is protected, and the duration of its storage. This Privacy Policy applies to use of our Services (including KNIP) and our Website.

Privacy and Relevant Legislation

Personal data is only processed under the General Data Protection Regulation (**GDPR**),¹ which has replaced various Personal Data Protection Acts in the European Member States since 25 May 2018. We also comply with other relevant legislation on protecting personal data, such as the Telecommunications Act for the use of cookies. All legislation mentioned hereafter is collectively called **Relevant Legislation**.

Personal Data

The term "**Personal Data**" in this Privacy Policy, means all information by which a person can be identified, directly or indirectly. This definition is in accordance with Relevant Legislation. This definition is so wide-ranging that under certain circumstances even a dynamic IP address can be Personal Data.

We are both a Controller and a Processor

Twelve as a Processor:

Most Personal Data collected is in the context of Services for our customers. Our customers determine the purpose and means of such processing. This means they act as a **Controller** within the meaning of Relevant Legislation. Twelve only processes Personal Data in accordance with written instructions from the customer and not for its own purposes. This means that Twelve acts as a **Processor** within the meaning of Relevant Legislation.

Twelve as a Controller:

Aside from processing to benefit our customers/clients, we also collect and process Personal Data for our own purposes. In this context, Twelve itself then acts as a Controller. Further on in this Privacy Policy, we will explain precisely what information we process as a Controller and what as a Processor.

¹ <http://eur-lex.europa.eu/legal-content/NL/TXT/PDF/?uri=CELEX:32016R0679&from=en>



What Personal Data do we process and for what purposes do we use them?

Twelve as a Controller:

Various types of Personal Data may be processed for our own purposes. Below is an indication of Personal Data collected for ourselves.

Data of our potential customers:

Personal Data	Purpose(s)
<i>Contact details of existing customers:</i> Name, email address and telephone number of the contact.	This information is used to: <ul style="list-style-type: none">– approach our customers appropriately in our communications;– keep and maintain contact with our customers;– send newsletters (only if it is a paying customer who has made no use of the right to object or if we have been permitted to do so).
<i>Tax details of our customers:</i> Customer name and address, invoicing information (Services provided, prices, VAT rates) and an optional VAT identification number.	This information is used to: <ul style="list-style-type: none">– draw up invoices for our customers;– include records in our administration to benefit the Tax and Customs Administration;– be able to provide Services to our customers.
<i>Bank details of our customers:</i> Account number, IBAN and BIC code.	This data is used so our customer payments can be processed and administered.
<i>Details relating to previous Services to our customers:</i> History of Services already rendered to the customer.	This information is used to: <ul style="list-style-type: none">– identify which Services customers have used;– send newsletters about Services that may interest the customer, based on Services rendered to that customer.
<i>Contact details of potential customers using a contact form on the Website:</i> Name, organisation's name, email address, telephone number and any Personal Data in the message.	These details are used to contact you in response to your message.
<i>Details when using our contact services:</i>	This information is used to:



Contents of messages, technical information about the communication and claimed identity.	<ul style="list-style-type: none"> - evaluate the effectiveness and performance of our contact services; - prevent illegal use of our contact services; - comply with our statutory obligations.
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Our personnel details:

Personal Data	Purpose(s)
<p><i>Personal Data of our personnel:</i></p> <p>Data in the employment agreement, payroll administration, tax details, identification, photo and personnel file.</p>	<p>We use this data to implement the employment agreement with the employee and to provide details to the Tax and Customs Administration.</p>

Data of job applicants:

Personal Data	Purpose(s)
<p><i>Contact details of job applicant:</i></p> <p>First name, surname and email address.</p>	<p>We use these details to contact and to maintain contact with the job applicant.</p>
<p><i>Application data of job applicant:</i></p> <p>Details in the curriculum vitae, motivation letter and any recorded video (such as qualifications, working experience and training) and details of the job applicant's limitations which would mean the position cannot be fulfilled.</p>	<p>These details are used to estimate which job applicant is a suitable candidate to work at Twelve.</p>
<p><i>Details of job application procedure:</i></p> <p>Notes about job interview(s) and, if applicable, results of assessments and other tests.</p>	<p>These details are used to estimate which job applicant is a suitable candidate to work at Twelve.</p>

We may also collect Non-Personal Data if you make use of our Website and/or Services, such as technical information of your computer or telephone.



Twelve as a Processor:

Various types of Personal Data are processed on behalf of our customers via our Services. Below is an indication of the Personal Data processed for our customers.

Data of our potential customers:

Personal Data	Purpose(s)
<i>KNIP registration and login details:</i> Email address, password, pin code, IP address and username (optional).	This data is used (by or on behalf of the customer) to: <ul style="list-style-type: none">- create an account for you;- provide you with access to your unique account;- secure your account and the application.
<i>Personal Data for KNIP account:</i> First name and surname, email address, address, date of birth, gender (optional).	This data is used (by or on behalf of the customer) to: <ul style="list-style-type: none">- verify your identity;- communicate with you and to address you correctly;- send your debit card (if our customer requires this);- verify your age when alcoholic beverages are bought.
<i>Financial data:</i> Bank account name and IBAN.	This data is used (by or on behalf of the customer) to settle refunds:

Why are we allowed to process your Personal Data?

Twelve as a Controller:

There are several bases in Relevant Legislation, on the strength of which we may process Personal Data or need to process it for our own purposes:

- Implementation of the agreement: Some data is necessary to implement the agreement with our customers, such as contact and invoicing details.
- Statutory obligation: We must retain several details in our records for the Tax and Customs Administration, such as invoicing details and our payroll administration.
- Legitimate interest: There is a legitimate interest in the processing of other data, for example, for processing the data of job applicants and for sending newsletters to our customers.
- Consent: Consent is required to send newsletters to persons who are not existing customers. Such consent may be given by subscribing to our newsletter via the Website. Consent may always be withdrawn via the unsubscribe link in every newsletter.



Twelve as a Processor:

Personal Data on behalf of our customers is processed based on their written instructions. All agreements regarding this processing have been established with our customers in a Processor Agreement.

You provide Personal Data for the customer voluntarily. Sometimes, not providing your Personal Data could cause you to have no or limited use of certain products or Services related to using KNIP.

How long is Personal Data stored?

Twelve as a Controller:

Personal Data is stored for as long as we need it for the purposes described above. The following retention periods are maintained:

- **Personal Data in our records for the Tax and Customs Administration** | This data is stored for seven (7) years, unless we are statutorily required to retain the data for longer;
- **Personal Data of job applicants** | This data is stored up to four (4) weeks after the job application procedure, unless we have consent from the applicant to retain the data for one (1) year;
- **Personal Data of our personnel** | Personal Data is stored in the personnel file for two (2) years, unless we are statutorily required to retain the data for longer;
- **Personal Data of customers** | This data is stored up to two (2) years after collaboration with the customer has ended, unless we are statutorily required to retain the data for longer;
- **Other data** | Other Personal Data is only retained for as long as this is necessary for the purposes. Personal Data is deleted as soon as it is no longer required for the purposes for which it has been collected.

Twelve as a Processor:

Personal Data is stored on behalf of our customers if we are a Processor for the customer. After the collaboration, Personal Data is deleted from our systems. Customers can also instruct us to delete the data sooner.

Do we share Personal Data with others?

“Sub-Processors” are engaged to assist us with our Services. In this context, these Processors receive Personal Data from us, which they process on our instructions. For example, Processors are engaged for storage of login data and processing payments from our users.

The Processors engaged for processing Personal Data are, for example, hosting providers, storage providers and payment providers, transaction processors, token and access card suppliers, and parties that render software and data maintenance.

These Processors must strictly follow our instructions. They will therefore not use the Personal Data for their own purposes. We ensure that all our Processors comply with Relevant Legislation.

Apart from the above, your Personal Data will not be shared with others unless we are statutorily required to do so.



Exporting Personal Data outside the European Union

Personal Data may be transferred to parties outside the EU, if one of our Processors is located outside the EU. Transferring data outside the EU will always take place in accordance with Relevant Legislation (Chapter 5 of the GDPR).

General aggregated Non-Personal Data

Your Personal Data may be converted into Non-Personal Data. This means the data will be completely and irreversibly anonymised and aggregated. Then it will no longer contain any Personal Data, because no identification can take place based on that data. This aggregated data can be shared with trading partners for analysis, preparation of demographic profiles, and for improving our Services.

How is Personal Data protected?

All processed Personal Data is protected against unauthorised and unlawful access, alteration, disclosure, use and destruction. For example, the following technical and organisational measures are taken to protect Personal Data:

- You are never asked for your password and pin codes. If you think that your username, password and/or pin codes are no longer safe, then you will be asked to no longer use your Token, Payment account and Account, and to contact us.
- In developing our software, account has been kept of industry standard OWASP (Open Web Application Security Project) security guidelines.
- Penetration tests are periodically carried out on our systems by an external party.
- Communication with our systems is protected with TLS 1.2 in combination with AES 256.
- Passwords are stored encrypted in our database.
- Back-ups are made based on transaction log back-ups every ten minutes. In addition, a full back-up is made every week and these back-ups are stored off-site and encrypted.
- Internally, personnel only have access to data within the business unit where they work via our web-based applications.
- Personnel make use of exceedingly strong passwords, which are enforced by our applications.
- Test data in every case is synchronised anonymised to our test platform.
- Security patches and updates for systems of third parties are implemented monthly, weekly or directly after release depending on their priority.

Websites of third parties

Hyperlinks are available on our Website which link to the websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. We have no control over the contents or links that appear on these websites and we are not responsible for any practices of websites linked to or from our Website. In addition, these websites and their contents and links can change constantly. These sites may have their own privacy policy, user terms, and customer policy. Browsing and interaction on any other website, including websites linked to or from our Website, is subject to the terms and policy of that website.

Cookies

We make use of cookies on the Website and in the APP. A cookie is a simple small text file that can be placed on your device when you visit the Website or APP. This text file identifies your browser and/or device. When you revisit our Website or APP, for example, the cookie ensures that our Website or APP recognises your browser or device.



We use the following types of cookies:

Functional cookies: functional cookies are essential for the functioning of our Website and APP. They allow you to navigate through our Website and in the APP and to make use of the features it contains.

Analytical or statistical cookies: analytical cookies are used to explore the quality and effectiveness of the Website and APP. For example, we can see how many users visit the Website and which pages are visited. We use this information to improve our Website, APP and Services.

Tracking cookies: Tracking cookies follow the clicking and browsing habits of our visitors. With these cookies we can see whether and, if so, when you view your profile and whether you click-through to our Website and APP. We may use these cookies to reflect advertisements based on your interests.

If you do not want cookies sent to your device, this can be changed based on the cookie settings of your browser. Some features or Services on our Website and APP may not function or not function properly without cookies.

More information about the cookies we place on our Website and APP is available in our Cookie Statement: <https://www.twelve.eu/privacy-policy/>.

Amendments to this Privacy Policy

Our Website and Services are constantly being improved. This means, this Privacy Policy could be amended occasionally. A clear notification will be placed on our Website and/or via KNIP to inform you about important amendments to this Privacy Policy.

Your rights and our contact details

Twelve as a Controller:

As defined in Relevant Legislation, you have the right to:

- request open access to and/or a copy of your Personal Data that we have processed. A copy of this may also be submitted to another data controller at your request;
- request that your Personal Data is corrected, modified or deleted from our systems;
- request limitation of the processing of your Personal Data;
- lodge an objection to us processing your Personal Data;
- submit a complaint to the Dutch Data Protection Authority, if you think that we process your Personal Data illegally.

Twelve as a Processor:

If a request as described above concerns processing for which we act as a Processor, then we will pass on your request to our customer who acts as a Controller. The data in your KNIP account can be consulted, modified or deleted. You may possibly no longer use your Token, Payment account and/or Account any more if you delete your data or have same deleted.



If you have any queries, comments or concerns about the way we deal with your Personal Data, please contact us via the contact details below:

TWELVE

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