

Whitepaper uMarketingSuite

uMarketingSolutions B.V. ('uMarketingSolutions') has developed add-on software (uMarketingSuite), which offers the users of this software ('customers' or 'you') the possibility to improve the experience of the website visitor. The software additionally enables you to personalize content for specific website visitors, based on analysis of their view and click behavior. These functionalities of the software are available via a cookie provided by uMarketingSuite.

uMarketingSolutions has asked ICTRecht to perform a privacy scan on the software, in order to ensure that uMarketingSuite can be used by its customers in a privacy proof manner. Based on this scan, ICTRecht concludes that uMarketingSuite has taken into account the privacy legislation when developing the software. uMarketingSuite minimizes the privacy impact on your website visitors. It has been designed with the principles of privacy by design and privacy by default in mind. For example, the following measures have been taken:

- the retention period for the uMarketingSuite cookie is 365 days by default. The data is anonymized after two years, and fully deleted after four years;
- the IP address is pseudonymized by default;
- the use of view and click behavior is optional;
- neither uMarketingSolutions nor any other third party has access to the data (except for, for example, your own hosting provider), as the cookie is first party.

You have the possibility to change default settings. However, we do not recommend doing so, as they are set in line with the General Data Protection Regulation (hereinafter: GDPR).

The customer as a controller

uMarketingSolutions does not have access to the data processed by using uMarketingSuite. The software runs on the server of the customer. In terms of the GDPR the customer is the controller of the personal data processed in uMarketingSuite. As such, the customer has a responsibility to comply with the GDPR when using uMarketingSuite. This includes:

- website visitors have to be informed about the processing of their data via uMarketingSuite;
- website visitors have to provide consent for the use of the uMarketingSuite cookie.

We would like to assist you in complying with these obligations. We therefore provide text proposals and implementation solutions below.

Information obligation

When using uMarketingSuite, this means that you, as a customer, have to inform about the use of uMarketingSuite, which personal data is processed, why it is processed and how. In order to comply with this information obligation set by the GDPR, you can add the following text to your privacy (and cookie) statement:

On our website we use uMarketingSuite. This is add-on software from uMarketingSolutions, which allows us, through the use of a cookie, to



**PRIVACY
VERIFIED**

Privacy Verified B.V.

Jollemanhof 12
1019 GW Amsterdam

PHONE NUMBER
020 663 1941

E-MAIL
info@privacyverified.nl

INTERNET
privacyverified.nl

CHAMBER OF COMMERCE
72602562

VAT
NL859169777B01

IBAN
NL39 RABO 0334 5390 64



**PRIVACY
VERIFIED**

analyze the website behavior of the website visitor. Based on this information, we can improve the user experience and personalize content for each specific website visitor. In order to do so, we process, amongst other things, your pseudonymized IP address, cookie ID, website and clicking behavior (optional), how you got to visit our website and your browser data. Only we have access to this personal data. The cookies will be deleted from your device after one year. The personal data collected through the use of the cookie will be retained for a maximum of two years. Hereafter, the data will be anonymized and retained for another two years. This way, we can identify trends on the website and improve the website.

By default, the IP address is pseudonymized, website and clicking behavior is collected and the cookie is deleted after 365 days. Moreover, the personal data is anonymized after two years and thereafter retained for another two years. However, you may decide to change these default settings. If you decide to change the settings, the abovementioned information needs to be changed accordingly.

Cookie consent

The cookie of uMarketingSuite can be categorized as an analytical and personalization cookie in one, as the cookie is used to analyze website visitor behavior *and* to personalize the content of the website based on this behavior. For analytical and personalization cookies consent is required, based on the GDPR and the ePrivacy Directive. As a customer and the controller of the personal data processed by the use of uMarketingSuite, it is your responsibility to obtain consent from the website visitor for the use of the uMarketingSuite cookie. Consent can be obtained by means of a cookie banner.

Text proposal cookie banner

The following cookie banner is an example of a cookie banner that complies with the law in the Netherlands. Please note that the ePrivacy Directive, contrary to the GDPR at its introduction, is open to interpretation by the different member states. Therefore, the rules regarding the use of cookies may vary.

Cookies

We use cookies on our website. We use cookies to ensure our website functions properly, to improve our website, to analyse the use of our website by visitors and to personalise the content on our website based on your interests. By clicking on “cookie settings”, you can select, which cookies you want to allow. By clicking on “accept all cookies”, you accept all cookies that are described in our [privacy and cookie statement](#). You can change your mind and consent choices at any time.

COOKIE SETTINGS	ACCEPT ALL COOKIES
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When the website visitor clicks on ‘privacy and cookie statement’, he or she must get to your privacy and cookie statement. At this moment, no cookies may be placed yet. This is only allowed once actual consent has been given by the website visitor. When the website visitor clicks on ‘cookie settings’, the following text should appear:



**PRIVACY
VERIFIED**

Functional cookies

Functional cookies ensure that our website functions properly.



Non-functional cookie

This cookie gives us insights in the usage of our website. On the basis of this information, we are able to improve our website. Moreover, this cookie makes it possible for us to personalize the content on our website based on your interests. The information is not shared with any third parties.



SAVE SETTINGS

ACCEPT ALL COOKIES

For more detailed information about the use of cookies on this website, please read our [privacy and cookie statement](#).

The website visitor should be able to check and uncheck the boxes (with the exception of functional cookies). As consent is not required for functional cookies, this cookie can be pre-checked. For the uMarketingSuite cookie, consent is required. Therefore, this checkbox may not be pre-ticked, but needs to be ticked by the website visitor itself. Again, when the website visitor clicks on 'privacy and cookie statement', he or she must get to your privacy and cookie statement. Therefore, make sure a hyperlink to the privacy and cookie policy is included.