

## **ETS Navigator Privacy Statement & Cookie policy**

### **Introduction**

At ETS Navigator we are committed to safeguarding the privacy of our website(s) visitors and users of our services. This Privacy Statement outlines the types of personal information we collect, how we use it, and the choices you have regarding your data. Our website(s) is (are) operated by Docklab Infra B.V. (“ETS Navigator”, “we” or “us”, company details below).

This Privacy Statement (“Privacy Statement”) explains how we use your (“you”, “user”) personal information. By using our website(s) or services, you expressly confirm acknowledgment and acceptance of the Privacy Statement and agree to be bound by it.

If you have any questions about our use of your personal information, cookies or similar technologies, please contact our privacy team by email at [privacy@etsnavigator.com](mailto:privacy@etsnavigator.com)

### **Personal information we collect**

We may collect and process the following personal information about you:

1. Information you provide voluntarily by filling in forms on our website(s).
2. Information related to your use of our services, e.g. your name, address, email address, phone number, account name.
3. Information that is collected automatically, including your network information, device information, IP address and location, browser type, and operating system.
4. Cookies; our website(s) and services use(s) cookies to enhance your browsing experience. These cookies may track your browsing behavior on our website(s) and services and help us analyze user preferences to improve our services and services. You can adjust your browser settings to refuse cookies, although this may impact your experience on our website(s) and services.

### **Use of personal information, legal basis**

We use personal information to provide you with our services, customize your experience on our website(s), and to monitor, analyze, administer, enhance our website(s) and services.

The legal basis for collecting and using the personal information as set out in this Privacy Statement depends on the personal information concerned and the specific context and nature in which we collect and use it. In general we will collect and use your personal information to perform a contract with you (e.g. to provide our services, website(s), follow up on contact requests), or if we have a legitimate interest in the processing of your personal information and this interest is not overridden by your interests or fundamental rights and freedoms or if we have your consent to do so.

We may also be required by law to collect and process your personal information or otherwise need it to protect your vital interests or those of someone else (e.g. to prevent payment fraud or confirm your age and/or identity).

### **Disclosure of your personal information**

We disclose your personal information for certain purposes to group companies affiliated to us: we share your personal information among our group companies as needed for providing you with the website(s) and services.

We disclose your personal information for certain purposes to other companies, agents or third party service providers (TPSPs) to provide the website(s) to you, to perform services on our behalf or to assist us with the provision the services to you. For example, we engage TPSPs to provide security infrastructure and IT services. These TPSPs may have access to your personal information. We do not authorize them to use or disclose your personal information except in connection with providing their services to us.

And we may disclose your personal information with third parties in connection with any reorganization, restructuring, merger or sale, or other transfer of assets, in which case we will transfer personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Statement.

### **Processing period**

We collect and process your personal information each time you visit our website(s), use our services and we retain personal information thereafter as required or permitted by applicable laws and regulations; e.g. for administration purposes, internal assurance files and to follow up on contact requests. We take reasonable steps to securely destroy or anonymize personal data when it is no longer needed.

### **Your personal information and rights**

You have certain rights in relation to your personal information and our processing of your personal information. In particular you have the right to correct or supplement your personal information, the right to request restriction of processing, the right to raise an objection to or a complaint of the processing of your personal information, the right to access your personal data, the right to request the transfer of your personal information, the right to be informed of a breach of security of your personal information and, under certain conditions, the right to the deletion of certain personal data we information about you. Please contact us if you want to exercise your rights, see contact details below.

### **Security**

We use commercially reasonable appropriate administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure and as a result we cannot guarantee the security of your personal information.

### **Changes to our Privacy Statement**

We may update our Privacy Statement from time to time. Your continued visit/use of our website(s) or eservices after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes.

### **Third-Party Links**

Our website(s) and services may contain links to third-party websites. Please note that we are not responsible for the privacy practices or content of these third-party websites. We encourage you to review the privacy statements of any third-party websites you visit or third-party services you use.

## **Cookies**

We (and our TPSPs) use cookies and other technologies (such as web beacons), as well as resettable device identifiers, for various reasons. Cookies are small pieces of data stored on your browser by the website you visit, services you use. They serve various purposes, such as remembering your preferences, analyzing site traffic, and enabling certain website or services features. Types of cookies we (may) use:

1. **Essential cookies:** these cookies are necessary for our website(s) and services to function properly. They enable core functionalities such as security, network management, and accessibility.
2. **Analytical cookies:** we use analytical cookies to track and analyze how users interact with our website(s) and services. This helps us improve our website(s) and services performance and tailor it to better meet your needs.
3. **Advertising cookies:** We may use advertising cookies to deliver personalized advertisements that are relevant to your interests. These cookies may track your browsing habits across different websites and services.

Managing cookies: you can control and/or delete cookies as you wish. Most browsers allow you to refuse or accept cookies and to delete them. However, blocking cookies may impact your experience on our website(s) and services.

## **About ETS Navigator, contact details**

ETS Navigator is the trade name of Docklab Infra B.V., a Dutch private limited liability company, located at Vasteland 100, 3011 BP Rotterdam, the Netherlands. Docklab Infra B.V. is registered with the Dutch Chamber of Commerce under no. 88549070.

Any questions, requests and inquiries may be directed at:

privacy@etsnavigator.com

or at:

Docklab Infra B.V.  
attn. privacy team ETS Navigator  
Vasteland 100  
3011 BP Rotterdam  
the Netherlands

## **Version**

This Privacy Statement was last updated on 01 March 2024.