

# Privacy policy Raymond Social Impact

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# Privacy policy Raymond Social Impact

## RAYSITRADE - PRIVACY POLICY

Raysitrade takes your privacy very seriously and treats all your personal information with the utmost care. Raysitrade always acts in accordance with the General Data Protection Regulation ("AVG"). This document sets out Raysitrade's privacy policy for the use of Raysitrade services. We recommend that you read this privacy policy vehicle fully. If you have questions or need more information about this subject, do not hesitate to contact us via [adrmedia2013@gmail.com](mailto:adrmedia2013@gmail.com)

## Who is Raysitrade and how can I contact Raysitrade?

Raysitrade manages an online platform and community marketplace that facilitates vehicle exchange between people on its websites [www.Raysitrade.nl](http://www.Raysitrade.nl), <https://adrmedia2013.zohocreatorportal.eu/> and the Raysitrade app (hereinafter referred to as "Vehicleswap V14"). to offer and deliver, Raysitrade processes certain personal data as described in this privacy policy.

The party responsible for processing personal data is Raysitrade, a trade name of Raymond Social Impact, established in The Hague, The Netherlands.

All questions about the processing of personal data by Raysitrade can be directed to [adrmedia2013@gmail.com](mailto:adrmedia2013@gmail.com).

## Which personal data is processed by Raysitrade, why and on which legal basis?

### ***Create an account***

To be able to use the Raysitrade service, a personal account must be created. When you create an account, you must enter certain information about yourself:

Your contact details (such as first name, last name, e-mail, full address, mobile phone number, country) are required to be able to create an account with Raysitrade ("Contact details").

### ***Make a reservation***

To exchange your vehicle on the Raysitrade Platform you must register your vehicle and provide a copy of your driver's license).

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This personal data is required to make a reservation at Raysitrade!

Cover your passport photo and personal identification number before you upload a copy of your driver's license.

The processing of your personal data in this context is necessary for the performance of a vehicle exchange in connection with the use of the website and / or app to which you are (or will become) a party (Article 6, paragraph 1 (b) AVG).

## ***Offer a vehicle for vehicle-exchange***

To register your vehicle via the Raysitrade Platform you must provide your Contact Details, a copy of your driver's license (cover your passport photo and personal identification number (BSN) before uploading a copy), the availability of your vehicle, the license plate of your vehicle / vehicle and non-personal information about the vehicle.

This information is requested and processed by Raysitrade to make it possible for you to exchange your vehicle via Raysitrade, and to show the availability and location of your vehicle or vehicle ("Vehicle data"). Vehicle data is further used by Raysitrade to check whether your vehicle or vehicle is correctly registered in your Raysitrade account and has not been reported as stolen or missing, and to verify your identity and ownership of the vehicle.

The processing of your personal data in this context is necessary for the implementation of an agreement with Raysitrade in connection with the use of the website and / or app to which you are party (Article 6, paragraph 1, sub b) AVG).

## ***Enter a vehicle exchange***

Customer / owner contact details, vehicle registration number and geolocation are required to enter into a vehicle exchange and to ensure that the Insurance Company provides the insured coverage.

Note: To ensure that the Insurance Company provides insured coverage, Raysitrade forwards Vehicle Data to its insurance company, see ..... for contact details of the Insurance Company. The data transfer to the Insurance company is required to establish insured coverage between you and the insurance company, to check whether you meet the requirements, whether the vehicle is not registered as stolen or missed, and to verify your identity and ownership of the vehicle. to check. The processing of your personal data in this context is necessary for the implementation of the agreement with the Insurance Company to which you are a party.

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If the Insurance Company requests this, Raysitrade will provide her with Contact Details and Reservation Details in the event of theft or (suspected) fraud. The processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade and the Insurance Company, namely to prevent and detect fraud.

In addition, Raysitrade shares the following information registered: your Contact Details, Reservation Details the driver's license number (to verify your identity). The processing of this personal data is necessary for the protection of the legitimate interests that Raysitrade has (Article 6 (1) (f) AVG), namely to enable the (vehicle-exchangeal) lease of the vehicle, as well as communication between customer and vehicleowner .

Electronic communication between customer and vehicleowner can be sent via Raysitrade's servers or can be sent by Raysitrade to service providers to deliver the services to you

## ***Fraud detection***

To prevent fraud and abuse and to prevent fraudsters, scammers and other (vehicle) criminals, Raysitrade profiles your personal data. Profiling means any form of automated processing of your personal information to assess certain personal aspects about you, such as analyzing or predicting aspects related to your personal preferences, interests, reliability, behavior, location or relocations.

Raysitrade can detect that an account is being used in a way that fraudsters use it. Or Raysitrade may notice that an account is being used in a way that is unusual for you. If Raysitrade thinks there is (a risk of) fraud, Raysitrade can stop the activity on your account or deny access to your account. Note: if, based on the profile, we detect or have reasonable grounds to suspect that you are engaging in fraud, fraud or criminal activities, we will process your personal data in such a way that you are prevented from using our service in the future. In that case Raysitrade can also pass on your data to the competent authorities.

The profiling and processing of your personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) of the AVG), namely to prevent and detect fraud.

## ***Supervision of (vehicle-exchangeal) behavior***

To enable users to monitor your behavior, this data (ratings and frequency) is generated by Raysitrade based on your reservations and this data can be added to your profile, which is visible to all visitors on the website. The processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) of the GPR), namely to ensure greater reliability of the service.

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## **Customer service**

To provide (international) customer service, we may collect and share your personal information (Contact information, Reservation data, Vehicle data and Vehicle-exchangeal data) to answer your questions, such as helping you with matters that may arise with regard to your reservation (s), or the services. If you use the online chat function, the data processed by Raysitrade for this purpose is the browser data and the data you enter in the contact form to or provided in a chat conversation with Raysitrade. The processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) of the GPR), namely in order to be able to serve you efficiently and to optimize Raysitrade's customer service.

## **Keyless vehicle-exchangeal (exchange without key) / Raysitrade Direct**

To make keyless vehicle exchanges possible, Raysitrade collects the geolocation data of the vehicle. This information is requested and processed by Raysitrade so that you can offer your vehicle for keyless vehicle-exchangeal through Raysitrade and to show the customer the location of your vehicle to the customer. Raysitrade can also save information from the log file, such as events, status, location and speed, for fraud detection and prevention.

If you are a customer, the processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) AVG), namely to enable keyless vehicle-exchangeal of the vehicle between customer and vehicleowners, the location of the vehicle and to prevent and detect fraud.

With regard to vehicleowners, the processing of the aforementioned information is only based on the consent (Article 6 (1) (a) of the GPR) given by the vehicleowner when they enter into a Raysitrade Agreement to have the keyless equipment installed in their vehicle.

## **Information messages**

To be able to send you information messages (not marketing communications) that are required to deliver the services (such as push messages, system messages, e-mail messages and text messages that a vehicleowner receives if a customer is interested in a vehicle, or a message when a reservation is made) not completed), we can use your mobile phone number and / or your e-mail address. Raysitrade can also send you information regarding a reservation and a questionnaire or assessment form after you have made a reservation. The processing of your personal data for this purpose is necessary for the protection of the legitimate interests of Raysitrade (Article 6.1 (f) AVG), namely to provide users with sufficient information about their use of the service and to improve the service on the basis of reviews.

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## **Communication and assessments**

To ensure that you can communicate with other registered users and to be able to upload reviews and experiences, other registered users can use your phone number and email address that are registered!

## **Marketing emails**

You can register for our marketing emails. Our marketing e-mail may contain information about new offers, services from Raysitrade or products and services from other partners, etc. To register, you must provide us with your e-mail address. Other information used to optimize the marketing mail can be entered voluntarily. Raysitrade can also send you personalized marketing emails, depending on, among other things, your place of residence, account activity and behavior, and whether you are a customer or a vehicleowner. For example, if your vehicle needs an MOT, Raysitrade can send you a marketing email with an offer from a partner for an APK. By subscribing to our marketing mail you agree to receive advertising messages. The e-mail address used for your registration will only be used to send you our marketing e-mails, unless you have given us permission to use your e-mail for other purposes. It is always possible to withdraw your permission to receive our marketing emails. To unsubscribe, use the link provided in our emails; you can also change the settings in your account. The processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) of the GPR), namely direct marketing.

## **Marketing**

Advertising is only effective if advertisements are relevant to you. Raysitrade can therefore use your personal data to create customer profiles and to display personalized advertisements inside and outside of the Raysitrade website. Based on the information you share with us, Raysitrade can display personalized offers, which may also be offers from third parties. We do not send the data to our partners, but our partners can see that you have clicked on the partner link on our website. The processing of your data is only based on your consent (Article 6 (1) (a) of the AVG). You have the right to object to the profiling and you can withdraw your permission to receive personalized advertisements at any time via the contact details in Chapter 4.

## **Custom Audience (Facebook).**

Raysitrade can participate in the Custom Audience program of Facebook, allowing Raysitrade to show personalized advertisements to people on the Raysitrade email lists

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when they visit Facebook.com. Raysitrade provides Facebook with personal information such as your name, city, zip code, email address and telephone number, so that Facebook can determine whether you have registered an account on Facebook. You can deactivate (opt-out) participation in Raysitrade's Facebook Custom Audience by sending an e-mail from the e-mail address for which you choose the opt-out, to the e-mail address stated in our contact details below. To confirm your opt-out, you must: (i) use the following text in the e-mail subject line - "Opting Out of Facebook Custom Audience Ads", and (ii) enter your name and e-mail address in the body of the e-mail. We send your name and email address to Facebook.com with the request to remove you from all our Facebook Custom Audience Ads.

The processing of your data to show personalized advertisements to people on the Raysitrade mailing lists when they visit Facebook is only based on your permission (Article 6 (1) (a) of the AVG).

## ***Merge data***

To minimize the processing of personal data, Raysitrade can merge or encrypt your personal data to create anonymous data that cannot be traced to a natural person. The processing of this personal data is necessary for the protection of the legitimate interests of Raysitrade (Article 6 (1) (f) of the AVG), namely to comply with privacy legislation and to protect your privacy.

## ***Automatically generated data (log files)***

Raysitrade collects automatically generated data about your use of the website. This information consists of your IP address (a unique number, which makes it possible to recognize your device); account activity (such as use of storage space, number of times to log in); data that is displayed or clicked on (such as UI elements, left); and other log information (such as browser type, IP address, date and time of access, cookie ID, and URL referrer). Raysitrade needs this information to ensure that the website works optimally (for example, to display content correctly and to keep the website safe); the processing of this personal data is therefore necessary for the protection of the legitimate interests of Raysitrade (Article 6, paragraph 1, sub f of the GDG).

## ***Complying with national legislation***

To comply with applicable legislation, Raysitrade may need to process all your personal data for others

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## What are my rights?

Under the AVG you have a number of rights with regard to your personal data and the processing thereof:

You have the right to be informed by Raysitrade whether or not your personal data is being processed and, if so, to have access to your personal data and additional information about the processing of your personal data;

You have the right to request Raysitrade to correct incorrect personal data;

In some cases you have the right to request Raysitrade to delete your personal data (the right to be forgotten);

In some cases you have the right to obtain the limitation of the processing of your personal data from Raysitrade, for example when you have disputed the accuracy of your personal data;

You have the right to receive at your request your personal data that you have provided to Raysitrade in a structured, common and machine-readable form and you have the right to forward this data to another controller, where the processing is based on your consent or on an agreement;

You have the right to object to the processing of personal data based on the legitimate interests of Raysitrade. Raysitrade will then no longer process the personal data, unless Raysitrade demonstrates that there are compelling justified grounds for the processing that outweigh your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim;

When personal data is processed for direct marketing, you have the right to object to the processing of your personal data for such marketing at any time. In that case, Raysitrade no longer processes your personal data for those purposes;

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before it is withdrawn.

You can submit your request to [adrmedia2013@gmail.com](mailto:adrmedia2013@gmail.com). Raysitrade will respond to your request as quickly as possible, but in any case within 30 days of receiving the request. This period may be extended by two months, depending on the complexity of the requests and the number thereof. Raysitrade will inform you within 30 days of receiving the request if such an extension will take place, stating the reason for the delay.

If Raysitrade takes no action on your request, Raysitrade will inform you as soon as possible, but in any case no later than 30 days after receiving the request, the reasons for not taking action. In that case you also have the right to submit a complaint to the supervisory authority and to appeal to the courts.

## How can I unsubscribe from Raysitrade and what happens to my personal data if I do that?

You can deregister as a user of the services of Raysitrade by sending an email to [Adrmedia2013@gmail.com](mailto:Adrmedia2013@gmail.com), stating that you want to deregister, or via the Contact form



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on the website. Raysitrade processes such requests as soon as possible, at the latest 4 weeks after receipt, or as otherwise required by applicable legislation.

Some personal data are retained after deregistration, such as your vehicle exchange data, as stated below in the section on storing data.

## How long does Raysitrade keep my personal data?

### *Contact details*

Remove 2 years after deregistration

### *Copy of driver's license*

Remove 2 months after deregistration

### *Extra information*

Remove 2 years after deregistration

### *Facebook data*

Remove 2 years after deregistration

### *Vehicle data*

Remove 2 years after deregistration

### *Information about Communications / Assessments*

Remove 2 years after deregistration

### *Data about vehicle exchange behavior*

Remove 2 years after deregistration

### *Marketing data*

Remove 2 years after deregistration

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## *Data User profile*

Remove 2 years after deregistration

## *Data to comply with national legislation*

As required by applicable law

Remove if permitted by applicable law

## *Reservation data*

Remove 5 years after deregistration

## *Fraud detection data*

Remove 5 years after deregistration

Note: with a view to protecting against fraud, we may retain the necessary personal data for a reasonable period of time that may be longer than the aforementioned retention period. Raysitrade may also retain personal data for longer if required by applicable law.

Raysitrade can always store the collected data in an aggregated and anonymous form, to perform analyzes and research, for market research and / or to prevent fraud.

## *How does Raysitrade protect my personal information?*

The protection of your Personal Data is extremely important to us. Raysitrade therefore uses reasonable administrative, technical and physical security measures to protect your Personal Data against unauthorized access, destruction or alteration of information. We also conduct Privacy Impact Assessments every year, and we have our systems scanned every month by a specialized security organization to determine whether our security measures are still adequate.

## *Can this privacy policy be changed?*

It is possible that the privacy policy will be changed in the future. It is therefore recommended to regularly visit the section on the website where the privacy policy can be read.

## *What are cookies and how are they used by Raysitrade?*

While you use the website, various cookies are stored on your computer, mobile device and / or tablet ("Devices") that can then be viewed. Cookies are small pieces of information (in the form of text) that a server sends to the browser (such as Internet Explorer or Firefox) with the intention that the browser sends this information back to

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the server the next time a user visits the website. Cookies cannot damage your Devices or files stored in them. information about how Raysitrade uses cookies.

## *Where can I submit my complaint?*

If you suspect that data protection law has been breached and the issue cannot be settled by mutual agreement between you and Raysitrade, you have the right to file a complaint with a regulatory body.

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If you have any questions or need more information about the above and / or this subject, please do not hesitate to contact us via [Adrmedia2013@gmail.com](mailto:Adrmedia2013@gmail.com).