

Privacy Statement

Reisbalans – Arval Mobility Pass

Your privacy is important to us. In this statement, we explain what we do with the personal data we collect from you or that you provide to us. We therefore advise you to read this privacy statement carefully.

As a result of changes in legislation, technological advances, and the continuous development of our services, our privacy policy is subject to change. Whenever a change occurs with a significant impact on data subjects, we will notify you that our privacy statement has been updated. Changes with no or minor consequences for data subjects will not be communicated. The most recent version of our privacy statement applies and can always be found on our website.

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Definitions

Below we explain the meaning of a number of terms used repeatedly in this document that are not defined by the GDPR:

Third party/parties A party other than yourself and other than Reisbalans or any of its subsidiaries. For example: your employer or municipality.

Universally Unique Identifier (UUID) An ID used in software architecture to uniquely identify an object or entity — such as a database, a file, or a user — in computer systems.

Check-in check-out (CICO) data Data related to check-in and check-out on public transport, such as check-in and check-out station, time, and OV-chipcard number.

Single Sign-On An authentication method that allows you to securely log in to multiple applications or websites using just one set of login credentials. You do not need to remember different usernames and passwords.

Push notifications A push notification is a message on your smartphone that is "pushed" to you. You do not need to open the app to check for new information — it is presented to you on your phone's lock screen or via a notification.

Metadata Metadata refers to all "invisible" information present in virtually every digital file. In the case of a photo, this may include the make and model of the camera used, as well as the time and location (GPS coordinates) recorded by the device.

Categories of personal data In this privacy statement, we group personal data for convenience and readability. To ensure clarity about what we mean, the table below provides an overview of these categories, their definitions, and the data they include:

Category	Explanation	Contains
Customer identification numbers	A series of digits or alphanumeric combinations used internally by Reisbalans or by third parties to identify the end user. Used for pseudonymisation.	Ownership ID (Reisbalans internal), Entity ID (Reisbalans internal), Customer number (third parties), Employee number (employer), Transponder code (third parties), UUID

Category	Explanation	Contains
Engraved ID	Card number as printed on the card	Card number
Chip ID	Card number as stored in the chip of the card	Card number
Vehicle data	Data relating to the vehicle and its use	Licence plate, Make and model, CO ₂ specification, Driving behaviour data such as speed, braking force, etc.
CICO data	Check-in and check-out data as received from public transport operators	Check-in and check-out stop, Check-in and check-out date, Check-in and check-out time, Carrier, Transaction costs, Card balance
Location data	Data relating to the location of the data subject	Start and end location of trip, Location of parking action
GPS data	Data used to enable GPS tracking	Total distance in km, Mode of transport, Start date and time, Modality (on foot, car, bike, etc.), Purpose (to work, to home, etc.), Average speed, Duration, User role (passenger/driver/n/a), GPS coordinates
Contact details	Contact details as known to Reisbalans	(Business) email address, (Business) phone number, Home address, Work address
Electronic identification data	Data used to identify the end user electronically	IP address, User Agent
Transaction data	All data relating to travel transactions made: CICO	CICO data, Location data, GPS data

Category	Explanation	Contains
	data, location data, and GPS data	
Administrative data	Data used by your employer for administrative purposes	Project code, Budget group, Cost centre, Department

Who are we?

Reisbalans makes flexible business travel simple, accessible, and hassle-free. To achieve this, Reisbalans provides a mobility card, employee and employer portals, and a smart app with GPS functionality. All administration is handled with remarkable ease and can be integrated with various HR and payroll packages. In order to deliver these services, we process your personal data. This privacy statement explains how we do so.

Reisbalans, registered at Smallepad 32-34, 3811 MG in Amersfoort, is ultimately responsible for the processing of personal data as described in this privacy statement, unless otherwise stated. If you have questions about this privacy statement or the way Reisbalans handles your personal data, you can contact us at:

Reisbalans B.V. Smallepad 32-34 3811 MG Amersfoort 088 – 934 3456
klantenservice@reisbalans.nl

Privacy Team: privacy@mobilityinvestgroup.com Data Protection Officer:
fg@mobilityinvestgroup.com

What data do we collect and process, and why?

We process information you provide to us directly, for example by using our services or when you contact our customer service. We also process personal data about you that we receive from other parties, and we share your personal data with other parties. This includes, for example, data we receive from and/or pass on to your employer or providers of mobility services. The personal data

we collect and process, the purpose for doing so, and the legal basis, depend significantly on the service you use. We set this out below.

Access to our services

You can gain access to our services in different ways:

- At the request of your employer, we send you an invitation containing a unique registration link, enabling you to create an account by setting a **USERNAME (BUSINESS EMAIL ADDRESS)** and **PASSWORD**. By doing so, you enter into an agreement with us. To be able to send this invitation, we receive your **(BUSINESS) EMAIL ADDRESS, FIRST NAME, AND LAST NAME** from your employer. Your employer may also choose to provide us with a broader set of personal data — for example, your **HOME ADDRESS** if the card is to be delivered to your home, or your **WORK ADDRESS** to enable reimbursement of commuting expenses. The exact data set provided to us can be requested from your employer and will be shown to you after registration in our web application for review and confirmation. You can of course request this data from us at any time. Your employer is the data controller for this data up until the moment it is received by us.
- You may also log in via Single Sign-On. In that case, we receive a **UNIQUE IDENTIFIER** from you. What that identifier is depends on how the SSO implementation has been configured with the relevant party. Examples include an **IDENTIFICATION CODE** or an **EMAIL ADDRESS**.

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

Use of our services

Once you have gained access to our services, you will make use of one or more of them. The personal data we process depends significantly on the services you use. Your employer determines which of our services are available to you. Below is a list of the services we offer; you can find information about the processing of your personal data for each service by clicking on the service name.

Use of the app or web application

- [Trip registration](#)
- [CO₂ registration](#)

- Travel expense reimbursement
- Working-from-home allowance
- Reports for the employer
- Shared mobility via third parties
- On-street parking
- Taxi
- Electric charging
- Submitting expense claims
- Route planner

Use of the personal mobility card

- Car park parking
- P+R parking
- OV-Fiets (public transport bicycle)
- Fuelling

Invoicing

Customer service

NS Business Card administration

Use of the app or web application

The data we collect for your account in the app or web application has already been explained under *Access to our services*. When you use one of our apps or web applications, we use the **CONTACT DETAILS, TRAVEL HISTORY, CARD DATA, TRAVEL BALANCE, TRANSACTION DATA, AND LOCATION DATA** we hold about you within the app or web application.

After you log in to the app, we exchange data between the app and the web application. Through the app, we can provide travel advice, send you push notifications about validating trips, and allow you to contact our customer service. To enable the services we offer via our apps and web applications, personal data from the app or web application is shared with other parties. We

also receive data about you from these parties, which we then share with you via the app or web application. The specific data involved varies per service and is set out below.

TRIP REGISTRATION

You can register your trips and view your travel history via the app and web application. Trips can be registered in two ways: manually or via GPS.

Manually

You enter the **START AND END POINT AND THE DATE AND TIME OF YOUR TRIP** yourself. We then convert these addresses into GPS points and plot them on a geographic map, allowing us to calculate the route taken and the distance in kilometres.

In this case, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

GPS Registration

GPS registration only works in the app, only if your employer offers this feature, and can be set up in three ways:

- *Automatic per trip* — You enable **LOCATION TRACKING** yourself for each individual trip.
- *Automatic per time period* — You specify in the app during which period — for example, during your office hours — the app may automatically determine your location.
- *Automatic* — You enable **LOCATION TRACKING** for the app **AT ALL TIMES**. Automatic trip registration records your trips automatically so you do not need to enter them manually. Automatic trip registration uses your location in the background when the app is not in use.

In the case of GPS registration, we process this data on the GDPR legal basis of **consent**. This data is retained for a maximum of 2 years, with the exception of intermediate GPS coordinates, which are deleted once the trip has been confirmed.

If you use GPS trip registration, the registration is based on the location determination (phone signal, Wi-Fi, and/or GPS) of your mobile device. Location tracking is disabled by default in the app. Your consent is requested before location tracking is enabled. You can enable or disable location tracking at any time.

To simplify trip registration (manual or via GPS), you can provide your **HOME AND WORK ADDRESS**, as well as the **LICENCE PLATES OF THE VEHICLES** you use and any **FAVOURITE ADDRESSES**. You are not required to enter this data; it is purely for your own convenience.

We process this data on the GDPR legal basis of **consent**. This data is retained for a maximum of 67 days after the termination of your account.

CO₂ REGISTRATION

In addition to the distance travelled and the cost of your trip, we also record the associated CO₂ emissions. We do this based on the list of emission factors — or, if you have registered the licence plate of the vehicle used with us, based on data held by the RDW (Netherlands Vehicle Authority).

We process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

TRAVEL EXPENSE REIMBURSEMENT

Where we have granted you access to our services on behalf of your employer, we use your transaction data to calculate your travel expense reimbursement. In many cases, these calculations serve as input for processing via your salary. To do this and to provide the necessary substantiation, we share your data with your employer — including **TRAVEL HISTORY, CARD DATA, TRAVEL BALANCE, TRANSACTION DATA, AND LOCATION DATA**. We only share data that is relevant to your employer, meaning we only share data you have marked as business-related or commuting-related.

In this case, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for the legally required period of **7 years**.

WORKING-FROM-HOME ALLOWANCE

It is also possible to register a working-from-home allowance in our app or web application. For this purpose, we only record the **DATE** and the **ALLOWANCE AMOUNT**.

We process this data on the GDPR legal basis of **performance of a contract**. This data is retained for the legally required period of **7 years**.

REPORTS FOR THE EMPLOYER

Where we have granted you access to our services on behalf of your employer, we may, upon request, provide specific reports to your employer — such as CO₂ reports or reports on lease kilometres driven. For this purpose, we may process the following personal data: **UNIQUE IDENTIFICATION NUMBER, ENGRAVED ID, CHIP ID, VEHICLE DATA, CICO DATA, LOCATION DATA, GPS DATA, CONTACT**

DETAILS, TRANSACTION DATA, ADMINISTRATIVE DATA. We do this in as aggregated and anonymised a form as possible.

We process this data under the GDPR legal basis determined by the data controller, as these types of reports are produced on behalf of your employer.

It is important to note that for this processing activity, Reisbalans acts as a **processor** under the GDPR. Your employer is the data controller in this context, and your employer's privacy terms therefore apply to this processing. Non-anonymised data is retained for a maximum of 2 years.

SHARED MOBILITY VIA THIRD PARTIES

Through our apps and web applications, you have the option to use various shared mobility services, such as shared cars, scooters, and bicycles. To make these services available to you, we share personal data with the relevant providers. These parties may in turn share your personal data with other service providers — for example when you use MyWheels or Check, which are offered via Shuttel. The data we share with Shuttel for this purpose can be found [here](#).

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

ON-STREET PARKING

Through our apps and web applications, you have the option to activate and use our on-street parking service, which facilitates parking outside P+R locations and car parks. To make this service available to you, we share personal data with the relevant providers.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

TAXI

Through our apps and web applications, you have the option to activate and manage our taxi service, which allows you to book a taxi through us. To make this service available to you, we share personal data with the relevant providers.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

ELECTRIC CHARGING

Through our apps and web applications, you have the option to activate and use our electric charging service, which gives you access to electric vehicle charging points. To make this service available to you, we share personal data with the relevant providers.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

SUBMITTING EXPENSE CLAIMS

Our apps and web applications also allow you to submit expense claims for other costs, such as lunch or parking expenses, by photographing, scanning, or uploading a document from your computer.

When you submit expense claims in this way, we process **PERSONAL DATA RELATING TO THE CLAIMS** and the **PROOF OF EXPENSE**, such as a **RECEIPT**. Please be aware that any metadata attached to a scan or photo by your device will also be shared with us upon upload.

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

ROUTE PLANNER

The planner allows you to plan a journey using various modes of transport. It provides travel advice on how to travel and which modes of transport and carriers to use — including private modes of transport such as bicycle, motorbike, or car, as well as walking and shared mobility providers via third parties.

There are two planning modes:

- From location A to location B
- Near a specific location

From location A to location B In the A-to-B planner, you enter **TWO LOCATIONS** along with a **DATE and TIME**. The multimodal journey planner then shows all possible ways to travel between these two locations.

Near a specific location The "nearby" feature displays available public transport and shared mobility options at a **SPECIFIC LOCATION** on a map.

When using the planner, no personal data is exchanged with third parties. The locations you enter are shared anonymously only with the provider supplying the travel advice. When the travel advice is returned, it is linked to you as a user within our systems so that it can be displayed to you.

Requested travel advice is not retained.

Use of the personal mobility card

Once you have created an account with us, you have the option to request a mobility card. This is a business OV-chipcard, giving you access to all public transport within the Netherlands. As a licence is required to produce OV-chipcards, your card request is always processed via RC-BKA, a sister company of Reisbalans that holds such a licence. From RC-BKA, we pass on your **INITIALS, SURNAME, ADDRESS DETAILS, DATE OF BIRTH**, and — only where necessary — your **PASSPORT PHOTO** to our card producer Translink Systems (Translink).

Translink Systems acts as a processor under the GDPR with regard to the personalisation of OV-chipcards. With regard to the processing of transaction data from transactions made with the OV-chipcard, Translink is the data controller under the GDPR. Translink's privacy statement therefore applies to

that part of the processing. More information about the personal data we send to and receive from Translink, along with a link to their privacy statement, can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

We process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

CAR PARK PARKING

Car park parking is one of the services you can request in our apps and web applications that is linked to your mobility card. This service allows you to access car parks using your mobility card. To make this service available to you, we share personal data with our providers.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

P+R PARKING

P+R parking is one of the services you can request in our apps and web applications that is linked to your mobility card. This service allows you to access Park and Ride locations using your mobility card. To make this service available to you, we share personal data with our providers.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

OV-FIETS

OV-Fiets is one of the services you can request in our web applications that is linked to your mobility card. This service allows you to use an OV-Fiets (public

transport bicycle) with your mobility card, or to store your own bicycle at one of the staffed or self-service cycle parks at stations. To provide this service, we share your **OV-CHIPCARD NUMBER (ENGRAVED ID)** and the **CHIP ID** with OV-Fiets.

OV-Fiets is the data controller under the GDPR and OV-Fiets' privacy statement therefore applies. An overview of the personal data we send and receive can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

FUELLING

When you activate this service, your mobility card can also be used as a fuel card, giving you access to the services of various providers. To make this service available to you, we share personal data with these parties.

These parties are data controllers under the GDPR and their privacy statements therefore apply. An overview of these parties, their privacy statements, and the personal data we send to and receive from them can be found in our overview of recipients of personal data. More information about how we engage with these parties and ensure the appropriate handling of your personal data by them can be found [here](#).

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

INVOICING

VIA THIRD PARTY

Invoicing for our services is handled via your employer. Tax legislation requires your employer to maintain records regarding the payment of mobility allowances.

To enable your employer to comply with this obligation and to substantiate the invoices issued, we provide your employer with an overview of the trips you have made and confirmed as reimbursable. This overview contains **DATA TO IDENTIFY YOU**, such as your **EMPLOYEE NUMBER**, and **INFORMATION ABOUT YOUR TRIPS, INCLUDING DATE AND TIME, PURPOSE OF TRAVEL, AND TOTAL KILOMETRES TRAVELLED**.

We process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

As part of our services to your employer, we ensure that relevant data — such as **TRANSACTION DATA, DECLARED KILOMETRES, AND MODE OF TRANSPORT USED** — remains available to this third party.

This data is processed on the legal basis of **legitimate interest**. Reisbalans considers that its commercial interest in keeping this data available for its clients outweighs your interest in not having it held by Reisbalans rather than your employer. Because a statutory record-keeping obligation exists, the data must be retained in any case — the only question is where. This data is retained for the legally required period of **7 years**.

RECONCILIATION OF PRIVATE TRANSACTIONS

Where permitted by your employer, the mobility services offered via Reisbalans may also be used for private purposes. Private transactions are confirmed by you in the web application or app under the travel purpose "private".

SALARY RECONCILIATION

Reisbalans offers your employer the option to reconcile mobility allowances directly with your salary. We do this by establishing integrations with the HR or payroll system used by your employer. To substantiate the reconciliations made, we provide your employer with an overview containing **DATA TO IDENTIFY YOU**, such as your **EMPLOYEE NUMBER**, and **INFORMATION ABOUT YOUR TRIPS, INCLUDING DATE AND TIME, PURPOSE OF TRAVEL, TOTAL KILOMETRES TRAVELLED**, etc.

We process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of 2 years.

CUSTOMER SERVICE

We provide customer service as part of our offering. You can contact our customer service team through various channels. In all cases, we process the personal data necessary to assist you with your question, comment, or complaint — typically your **NAME AND ADDRESS DETAILS, (BUSINESS) EMAIL ADDRESS, PHONE NUMBER**, and any **OTHER PERSONAL DATA YOU SHARE WITH US**.

In all cases, we process this data on the GDPR legal basis of **performance of a contract**. This data is retained for a maximum of **1 year**.

NS BUSINESS CARD ADMINISTRATION

For companies with employees who travel using an NS Business Card (NSBC), we can take over the administration. NSBCs can be requested directly through us — we order the cards, process changes, and cancel cards when required.

This means we have access to **NAME, ADDRESS, PASSPORT PHOTO (IN THE CASE OF SUBSCRIPTIONS), EMAIL ADDRESS, and CHECK-IN AND CHECK-OUT DATA FOR JOURNEYS MADE WITH THE NSBC.**

It is important to note that for this processing activity, Reisbalans acts as a **processor** under the GDPR. Your employer is the data controller in this context, and your employer's privacy terms therefore apply to this processing. This data is retained for a maximum of 2 years.

Improving our services

We process your personal data to further improve our services and user experience. We do this by conducting (or commissioning) analyses of your data, for example when you visit our website or use our app — including data such as **IP ADDRESS, SYSTEM INFORMATION, AND ACCOUNT DATA.** We also analyse anonymised **TRAVEL DATA** to improve our services.

This data is processed on the legal basis of **legitimate interest.** Reisbalans considers that its commercial interest in improving its services and user experience outweighs your interest in not providing this data to us. Reisbalans believes it would be insufficiently able to improve its services without this data, and that the privacy impact of this processing on you is limited.

This data is retained for a maximum of **18 months.**

Security

To optimally protect your data and ours, we collect data about the use of our services — including for the purposes of fraud prevention and detection. This includes account data, system information, and IP addresses.

This data is processed on the legal basis of **legitimate interest.** Reisbalans considers that keeping its services and applications secure is sufficiently important to justify a limited intrusion on your privacy. Reisbalans believes the privacy impact remains limited, while extensive measures have been taken to secure the data collected — including encryption, masking, data minimisation, storage limitation, and access restriction. This data is only accessible to employees of our organisation who require it, and only on the basis of strong authentication using a complex password or two-factor authentication (2FA).

This data is retained for a maximum of **120 days.**

With whom do we share your data?

Under the section *'What data do we collect and process, and why?'* you will have read that we work with various providers to deliver services to you, to optimise the security of our own services, or to offer services to your employer. Our overview of recipients of personal data also contains more detailed information about which data relates to which service and which provider.

Our guiding principle when sharing data is always to share the minimum necessary data, in a secure manner, with parties that can demonstrably show they handle it appropriately. We share your personal data in the following circumstances:

- We provide personal data to (representatives of) your employer. In the event of a security incident or data breach, we may also share personal data — relating to that incident or breach — with your employer. We wish to draw your attention to the fact that your use of our services results in a file of personal data on the basis of which your employer may make decisions regarding the use of our services. For example, your travel history — including location, time, and mode of transport — may be viewed by your employer.
- We are required to provide your personal data if we are legally obliged to do so for any reason.
- We exchange data with providers acting as data controllers. See *'What data do we collect and process, and why?'*
- We may provide your personal data to processors within the meaning of the GDPR — providers carrying out activities on our behalf. Personal data is only shared with partners where we consider this necessary for our business operations, the correct and secure functioning of our services, or the development of future services. When working with partners, we, as data controller, ensure that personal data is processed by those providers in a proper and careful manner in accordance with the GDPR. The types of processors involved include:
 - Hosting parties
 - Customer service and communication services
 - Accounting software
 - Application performance monitoring software

- Data analysis software and services
- Security software for keeping our services secure
- IT development software
- Payment providers

As stated earlier in this document, we do not use your personal data for purposes other than those described in this privacy statement. We will never sell your personal data.

Links to third-party sites

Our service may contain links to or references to other websites and apps operated by third parties, which may collect information about you. We have no control over such sites or their activities. Any data, including personal data, that you provide to those third parties is provided directly to them and is subject to their own privacy policy. We are not responsible for the content, privacy and security practices, or policies of third parties to which we link or refer. We recommend that you review the privacy and security practices and policies of any third party before providing them with your data. These can be found on the third party's website; alternatively, you can request them directly from the third party.

How do we secure your data?

To protect your personal data, we have put in place physical, technical, and organisational measures. Our aim is always to ensure the full reliability, integrity, and confidentiality of all personal data in our databases, and to protect the privacy and security of our applications and databases. The measures we have taken include:

1. We have implemented physical and technical measures and management procedures designed to prevent unauthorised access, loss, or misuse of personal data as far as possible.
2. A formal incident response procedure is in place, which also covers the handling of data breaches.

3. Sensitive information and personal data — such as account passwords and payment-related identifying information — are transmitted in encrypted form.
4. Sensitive information is stored in encrypted and/or hashed form where possible (including your password).
5. We use current and secure encryption standards.
6. We restrict internal access to personal data to employees who require the information to perform their duties. We do this using role-based access control (RBAC) and the principle of least privilege. We also apply multi-factor authentication (MFA).
7. Our employees are bound by a confidentiality clause.
8. Our information systems are configured such that employees who are not authorised to access certain information or personal data cannot do so.
9. Our servers are hosted in a secure environment in data centres. You only have access to the front end of our servers and only by logging in with a username and password. You are responsible for keeping your login credentials secure.
10. Regular backups of personal data are made.
11. We invest in security awareness among our staff. Employees are trained to recognise phishing and to handle personal data securely.
12. We are ISO 27001, ISO 9001, and SOC 2 certified, meaning an independent body has confirmed that Reisbalans has its information security management in order. In addition, Reisbalans regularly has the security of its systems tested through penetration tests and vulnerability scanning tools.
13. We require our providers to maintain at least a comparable level of information security.

How can you exercise your rights?

The personal data we use belongs and continues to belong to you. You therefore have the right to view, correct, delete, restrict, or transfer the data we hold about you. This can be done via our web application and app. Our

customer service team can also assist you with your request. The following requests can be submitted to us:

- A **data portability request** based on your right to transfer personal data to another party.
- A **right to erasure request** (also known as the "right to be forgotten"), allowing you to exercise your right to be erased from our records.
- An **access request** based on your right to view the personal data we process about you.
- A **rectification and supplementation request** based on your right to have the personal data we process about you corrected.
- A **restriction of processing request** allowing you to exercise your right to have less data processed.
- An **objection request** allowing you to exercise your right to object to the processing of your data.

When we receive such a request, our first duty is to identify the data subject to ensure that we do not disclose your personal data to others. If we receive your request via one of our web applications or apps, you have already been identified through your username and password. As this is the least invasive identification method we can offer, we ask you — where possible — to submit your request via our web applications or apps.

If this is not possible, or if you do not use our web applications or apps, we will attempt to identify you using the data we hold about you.

Following successful identification, we will in principle process your request within 30 days. If this is not possible, we will inform you accordingly.

Please note that your request may have consequences for your use of our services.

Questions or complaints?

You have the right to submit a question or complaint to us regarding the processing of your personal data. Our contact details can be found under *'Who are we?'*

For any complaints about the way we process your personal data or handle your complaint regarding the processing of your personal data, you can contact

the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) directly by telephone on **(088) 18 52 50**, or via:

<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>