



Hiway Privacy Statement

Effective: 01/04/2020

Introduction

This Hiway Privacy Statement (“Privacy Statement”) describes how we collect, use, disclose, transfer, and store your personal data for the activities described below, including when you visit a Hiway website that links to this Privacy Statement (“Website”), and for our business account management. This Privacy Statement describes your choices and rights related to your personal data.

A reference to “Hiway,” “we,” “us,” or the “Company” is a reference to Hiway Operational Company B.V. , which is registered with the KVK as 80604250 and is located at Kenkenbos 1075w , Nijmegen in The Netherlands.

Hiway is the controller for the personal data discussed in this Privacy Statement

The Personal Data We Collect

Personal Data We Collect Directly from You

As a visitor to the Website you may choose to provide us with your personal data, such as:

- First name
- Last name
- Birthdate
- Email
- Phone number
- Bank Account information
- Company name and registration details
- Job level
- Functional role
- Temporary and permanent residential address
- Valid ID proof



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To access some areas of the Website, you will need to have account authentication credentials. As part of your account, you may choose to provide us with additional data, such as:

- A photo
- Areas of expertise

Account Management

We collect business contact and billing information for account management purposes related to the use of Hiway software-as-a-service applications or financial services.

Cookies, Web Beacons, and Other Similar Technologies

Hiway may use website tracking technologies to observe your activities, interactions, preferences, transactional information, and other computer and connection information (such as an IP address) relating to your use of our websites and services. We may also use log files, cookies, and similar technologies to collect information about the pages you view, links you click, and other actions you take when accessing our website or emails

How We Use Your Personal Data

We use your personal data for payroll and business account management purposes.

Protecting your personal information.

We use technical and organizational measures that provide a level of security appropriate to the nature of the personal information and the risks that are presented by processing your personal information. However, the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other forms of authentication involved in accessing password-protected or secured resources.

Transferring your personal information internationally.

Hiway operates as a global business and complies with applicable legal requirements when we need to transfer, store, or process your personal information in a country outside your jurisdiction. We take appropriate safeguards to protect your privacy, your fundamental rights and freedoms, and the ability to exercise your rights. For example, if we transfer personal information from the EEA, the UK, or Switzerland to another country such as the United States, we will implement an appropriate data transfer solution such as entering into



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“standard contractual clauses” approved by the European Commission or competent governmental authority (as applicable) with the data importer.

Retaining your personal information.

We retain your personal information for as long as we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

The criteria used to determine appropriate retention periods for personal information include:

- The length of time we have an ongoing business relationship with you
- The amount, nature, and sensitivity of the personal information we process
- Whether we have a legal obligation to retain personal information or whether retaining personal information is necessary to resolve disputes, including the establishment, exercise, or defence of legal claims

When we have no legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your privacy rights.

Depending on where you are located and how you interact with Workday, you may have certain legal rights over the

personal information we hold about you, subject to local privacy laws.

These may include the right, depending on your jurisdiction, to:

- Obtain access to your personal information that is being processed by us.
- Correct inaccurate personal information.
- Request the deletion of your personal information.
- Opt out of the sale or sharing of personal information for targeted advertising. Although this is not relevant at this point of time.
- Object to the processing of your personal information carried out on the basis of our legitimate interests in the EEA, UK, and Switzerland, and ask us to restrict the processing of your personal information.
- Request the portability of your personal information in a structured, commonly used, and machine-readable format.
- Withdraw your consent at any time, if we have collected and processed your personal information with your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.



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Lodging a complaint.

You may lodge a complaint with a data protection authority such as the supervisory authority of your usual place of residence. Alternatively, you may request the details of your competent data protection authority by using the contact details at the bottom of this Privacy Statement.

Exercising your Privacy Rights.

Hiway will not discriminate against you for exercising your rights. Hiway does not make decisions based solely on automated processing that produces legal or similarly significant effects as part of the processing activities covered by this Privacy Statement.

To exercise your rights with respect to information covered by this Privacy Statement, please contact us using the contact details at the bottom of this Privacy Statement or by submitting a request through our Request Portal. You must provide the information listed in the [Request Portal](#) so that Hiway can verify your identity. Hiway will take steps to verify your identity, including validating your name and the email you use when interacting with Hiway.