

# Ctac Group – External Privacy Statement

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# CONTENTS

1	INTRODUCTION	3
2	CHANGES TO YOUR PERSONAL DATA	4
3	WHAT PERSONAL DATA WE COLLECT – GENERAL INFORMATION	4
4	WHAT PERSONAL DATA WE COLLECT – OUR CUSTOMERS, SUPPLIERS, PROSPECTS AND THEIR EMPLOYEES AND/OR REPRESENTATIVES	5
5	WHAT PERSONAL DATA WE COLLECT – VISITORS TO OUR WEBSITES AND INTERACTING WITH US	15
6	WHAT PERSONAL DATA WE COLLECT – JOB APPLICANTS	23
7	WHAT PERSONAL DATA WE COLLECT – OTHER	26
8	WHAT IF YOU REFUSE TO PROVIDE US WITH PERSONAL DATA?	34
9	THIRD PARTIES	34
10	USE OF ARTIFICIAL INTELLIGENCE	34
11	SECURITY OF YOUR PERSONAL DATA	35
12	COOKIES	35
13	YOUR RIGHTS AS A DATA SUBJECT	35
14	QUESTIONS AND COMPLAINTS	36

# 1 INTRODUCTION

We are the Ctac Group. If we mention Ctac in the privacy statement, we refer to the Ctac Group. The Ctac Group includes the following companies:

Name	Company registration number	Website
Ctac N.V.	16066162	<a href="http://www.ctac.nl">www.ctac.nl</a> <a href="http://www.ctacnv.com">www.ctacnv.com</a>
Ctac B.V.	34102526	<a href="http://www.ctac.nl">www.ctac.nl</a> <a href="http://www.ctacnv.com">www.ctacnv.com</a>
Ctac Nederland B.V.	34102528	<a href="http://www.ctac.nl">www.ctac.nl</a> <a href="http://www.ctacnv.com">www.ctacnv.com</a>
Ctac Resourcing B.V.	34115183	<a href="http://www.ctac.nl">www.ctac.nl</a> <a href="http://www.ctacnv.com">www.ctacnv.com</a>
Ctac België N.V.	0464432238	<a href="http://www.ctac.be">www.ctac.be</a>
Digisolve-Mijn ICT B.V.	60370882	<a href="http://www.digimij.nl">www.digimij.nl</a>
Oliver B.V.	17257650	<a href="http://www.oliver-it.nl">www.oliver-it.nl</a>
Purple Square Management Partners B.V.	60727837	<a href="http://www.purplesqr.com">www.purplesqr.com</a>
Technology2Enjoy Holding B.V.	76574091	<a href="http://www.technology2enjoy.com">www.technology2enjoy.com</a>
Technology2Enjoy B.V.	67751628	<a href="http://www.technology2enjoy.com">www.technology2enjoy.com</a>
Technology2Enjoy Consulting Services B.V.	24294669	<a href="http://www.technology2enjoy.com">www.technology2enjoy.com</a>
Technology2Enjoy Resourcing Services B.V.	08090691	<a href="http://www.technology2enjoy.com">www.technology2enjoy.com</a>

We offer IT services to other companies. We process your personal data if you are a customer, work for one of our customers or if you contact or interact with us. In such cases, we process your personal data as a data controller and this privacy statement applies. This privacy statement describes how we process your personal data and what your rights are.

If we process personal data on behalf of our customers when providing our services, we are a data processor. Our processing activities as data processor are not covered by this privacy statement. If you want to know more about these processing activities, you can consult the privacy statement of the customer in question.

If you have any queries regarding this statement or the way in which we process your personal data, please contact our privacy officer via [privacy@ctac.nl](mailto:privacy@ctac.nl). We have also appointed a data protection officer, whom you can contact via [dpo@ctac.nl](mailto:dpo@ctac.nl).

We may make changes to this statement from time to time. Any material changes and updates to this statement that affect the personal data we process about you will be

communicated to you if we have your contact details and we will inform you via our company websites as described above.

## 2 CHANGES TO YOUR PERSONAL DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes or if you become aware that any personal data that we hold is not accurate.

## 3 WHAT PERSONAL DATA WE COLLECT – GENERAL INFORMATION

- 3.1 Personal data is all information related to a person who can be identified (directly or indirectly). For example, a name, telephone number, postal and electronic addresses, date of birth, payment information and bank details. Data that cannot be traced back to a person is not considered personal data. This is considered anonymous data.
- 3.2 The situations in which we process your personal data are listed below. We have also included the legal basis we use and how long we will keep your personal data for a specific purpose. We have made a distinction between your role as a data subject:
  - 3.2.1 In chapter 4, we explain which data we process if you are a customer, supplier or prospect, or an employee or representative of one of our customers, suppliers or prospects.
  - 3.2.2 In chapter 5, we explain which data we process if you visit our website, if you interact with us or if you are an investor.
  - 3.2.3 In chapter 6, we explain which data we process if you apply for a job at Ctac.
  - 3.2.4 In chapter 7, we explain which data we process for other purposes despite your role as data subject (e.g. for security purposes, in case of conflicts or for audit purposes).

## 4 WHAT PERSONAL DATA WE COLLECT – OUR CUSTOMERS, SUPPLIERS, PROSPECTS AND THEIR EMPLOYEES AND/OR REPRESENTATIVES

If you are our customer, supplier, prospect or their employee or representative, we may process your personal data. In the table below, we specify in which cases which personal data we process for the various processing activities we conduct.

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Negotiating, entering into and executing agreements with our customers and suppliers</b></p> <p>We process personal data of the customer/supplier and its employees and/or representatives for the purposes described above. This includes recovering debts owed to us</p>	<p>Customer/supplier:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Bank account number</li> <li>VAT identification number</li> <li>Invoice details</li> <li>Description of purchased services (including prices)</li> </ul> <p>Employee/representative:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Job title</li> <li>Employer</li> <li>Contact information</li> <li>Correspondence data</li> <li>Signature</li> </ul>	<p>Customer/supplier:</p> <ul style="list-style-type: none"> <li>Necessary for the performance of the agreement we will conclude or have concluded with the customer/supplier. If you refuse to share your personal data with us for these purposes, we cannot conclude a contract with you</li> </ul> <p>Employee/representative:</p> <ul style="list-style-type: none"> <li>Our legitimate interests to operate our business, conduct our onboarding activities, conclude contracts with clients and fulfil</li> </ul>	<p>We store the personal data for this purpose for up to 7 years after the contract has come to an end</p>	<p>We receive the personal data from you directly or your employer</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
		our legal and contractual obligations towards our clients and suppliers			
<p><b>Administration</b></p> <p>We store invoices and contracts of customers and suppliers to comply with our administration obligations</p> <p>We share this personal data with our accountant</p>	<p>Customer/supplier:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Bank account number</li> <li>VAT identification number</li> <li>Invoice details</li> <li>Description of purchased services (including prices)</li> </ul> <p>Employee/representative:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Job title</li> <li>Employer</li> <li>Contact information</li> <li>Correspondence data</li> <li>Signature</li> </ul>	Our legal obligation to store our (financial) administration. If you refuse to share your personal data with us for these purposes, we cannot conclude a contract with you or your employer	We store the personal data for this purpose for up to 7 years after the year in which the contract has come to an end	We receive the personal data from you directly or your employer	No
<p><b>Licence Measurement</b></p>	<p>Employee:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Last login date/time</li> </ul>	Our legitimate interests to operate our business, verify if software is used	We do not store personal data for this purpose	We receive the personal data via the system for	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>If your employer uses software provided by or via Ctac, we may process your personal data to assess whether your employer uses the software in line with their licence. For example, by counting the number of users</p>	<ul style="list-style-type: none"> <li>• When the account was created</li> <li>• Job title</li> </ul>	<p>in accordance with the licence and to fulfil our contractual obligations towards our clients and suppliers</p>		<p>which we perform the licence measurement or by your employer</p>	
<p><b>Communicating with us</b></p> <p>We process your personal data if you communicate with us or file (support) tickets</p>	<p>Customer/supplier:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Customer number</li> <li>• Identification pin code</li> </ul> <p>Employee/representative:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job title</li> <li>• Employer</li> <li>• Contact information</li> <li>• Correspondence and its content (please note that we have no influence over the</li> </ul>	<p>Customer/supplier:</p> <ul style="list-style-type: none"> <li>• Necessary for the performance or conclusion of the agreement with the customer/supplier. If you refuse to share your personal data with us for these purposes, we cannot conclude a contract with you or your employer</li> <li>• If the communication is processed for other purposes, we do so based on our</li> </ul>	<p>If the communication is related to the conclusion or execution of a contract, we store the personal data for this purpose for up to 7 years after the contract has come to an end</p> <p>Communication for other purposes will be stored for up to 7 years after the</p>	<p>We receive the personal data from you directly or from one of your colleagues</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
	content shared with us) <ul style="list-style-type: none"> <li>• Language</li> <li>• Ticket history</li> </ul>	legitimate interests to operate our business and communicate with customers/suppliers and their employees/representatives  Employee/representative: <ul style="list-style-type: none"> <li>• Our legitimate interests to operate our business, conduct our onboarding activities, conclude contracts with clients and fulfil our legal and contractual obligations towards our clients</li> </ul>	communication has been concluded		
<b>Automated e-mail signatures</b>  Our e-mails contain automated signatures, for which personal data is processed if you	<ul style="list-style-type: none"> <li>• E-mail address</li> <li>• Employer</li> <li>• Content of the e-mail to determine the appropriate location of the signature (the content itself is not read)</li> </ul>	Our legitimate interests to ensure that e-mail signatures contain up-to-date information (e.g. about recent events), are correctly inserted when mailing via mobile devices and to prevent inconsistent use of e-mail	For the duration of the communication with you	We receive the personal data from you directly or from one of your colleagues	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
communicate with us via e-mail		signatures which may harm the reputation of Ctac			
<p><b>Secondments at Ctac</b></p> <p>If you are seconded to Ctac via your employer, we process your personal data to confirm your identity</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Contact information</li> <li>Date of birth</li> <li>Gender</li> <li>Nationality</li> <li>Place of birth</li> <li>Employer</li> <li>Hourly rate</li> <li>Working agreements</li> <li>Information from your identification document (document number, type of document, issue date, validity and signature)</li> </ul>	<p>Our legitimate interest in performing the agreement we conclude with our supplier (your employer). We must ensure that the right person is working at Ctac for security purposes</p>	<p>We store the personal data for this purpose for up to 7 years after the contract with the supplier for your secondment has come to an end</p>	<p>We receive the personal data from you directly or from your employer</p>	<p>No</p>
<p><b>Secondments at Ctac's customers</b></p> <p>If you are seconded to a Ctac customer via Ctac or wish to be seconded via Ctac, we process your</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Contact information</li> <li>Date of birth</li> <li>Gender</li> <li>Nationality</li> <li>Employer</li> <li>Hourly rate</li> <li>Working agreements</li> </ul>	<p>Your consent for us to process the personal data and share the personal data with the customer for whom you will be working. If you refuse to share your personal data with us for these purposes, we</p>	<p>We store the personal data for this purpose for up to 2 years after you have given us your consent to process your personal data</p>	<p>We receive the personal data from you directly or from your employer</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>personal data to make sure you are the correct person</p> <p>Your personal data will be shared with the customer for whom you will be working</p>	<ul style="list-style-type: none"> <li>Information from your identification document (document number, type of document, issue date, validity and signature)</li> </ul>	<p>cannot second you at our customer</p>			
<p><b>Approaching prospects</b></p> <p>If you work as an employee or representative of a business prospect of Ctac, Ctac may process your personal data for the purpose of generating new business with the prospect</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Job title</li> <li>Employer</li> <li>Contact information</li> <li>Communication</li> <li>Gender</li> <li>Location of work</li> <li>Authority to sign</li> <li>Notes about arrangements, conversations and details</li> <li>Language</li> <li>Hobbies (to be able to invite you to events that match your interests)</li> <li>Events you participated in</li> <li>Outstanding tasks</li> </ul>	<p>Our legitimate interest to expand our business and approach prospects that may be relevant to Ctac. Although our interests are of a commercial nature, the processing activity takes place in a business environment (reducing the impact on your privacy) and the processing activity is common in that environment which is why we believe this processing activity fits within your reasonable expectations of privacy</p>	<p>We store the personal data for this purpose for up to 5 years after the last contact with the data subject or for up to 6 months after we have been informed that the data subject is no longer working for the prospect</p>	<p>We receive the personal data either from you directly, via a Ctac employee to whose network you belong, via your colleague, via the prospect or via a purchased lead (only with your consent)</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
		You are free to object to the processing of your personal data (see your rights below for more information)			
<p><b>Relationship management</b></p> <p>We want to be able to manage our relationships. This can be either with our customers, prospects or suppliers</p> <p>Managing our relationships entails processing your personal data to contact you, to send gifts, to invite you to events, to measure your satisfaction and to conduct polls and interviews</p>	<p>Processed for relationship management in general:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job title</li> <li>• Employer</li> <li>• Contact information</li> </ul> <p>For sending gifts:</p> <ul style="list-style-type: none"> <li>• Address</li> <li>• Event for which the gift is sent (e.g. a birthday)</li> </ul> <p>For communicating:</p> <ul style="list-style-type: none"> <li>• Correspondence</li> <li>• Gender</li> <li>• Location of employment</li> <li>• Notes about arrangements, conversations and details</li> <li>• Language</li> </ul>	Our legitimate interest to manage relations with our network, customers, prospects and suppliers and to improve our services. You are free to object to the processing of your personal data (see your rights below for more information)	<p>We store the general personal data and the personal data for communicating for up to 5 years after the last contact with you, or for up to 6 months after we have been informed that you no longer work for our customer, supplier or prospect</p> <p>Personal data for sending gifts is stored for up to 1 year after the gift has been sent. If the event for which the gift is sent is recurring, the event is stores for up to 5</p>	We receive the personal data from you directly or from one of your colleagues. The HubSpot ID is generated by HubSpot	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
	<ul style="list-style-type: none"> <li>Hobbies (to be able to invite you to events that match your interests)</li> <li>Events you participated in</li> <li>Outstanding tasks</li> <li>HubSpot ID</li> </ul> <p>For conducting polls and interviews:</p> <ul style="list-style-type: none"> <li>Answers to questions and polls</li> <li>Reports of interviews</li> </ul> <p>To invite to events:</p> <ul style="list-style-type: none"> <li>Interests</li> <li>Dietary preferences</li> </ul>		<p>years after the last contact with you</p> <p>Personal data for conducting polls and interviews is stored for up to 2 years after the year in which the poll and/or interview took place (after which the results will be anonymised)</p> <p>Personal data for events is stored for up to 6 months after the year in which the event took place</p>		
<p><b>Generating anonymised statistics via the customer feedback system</b></p> <p>We process your personal data to generate</p>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Language</li> <li>Employer</li> <li>Received feedback</li> </ul>	Necessary to pursue our legitimate interest of being able to improve employee performance and client satisfaction	Personal data is stored for this purpose for up to 3 months, after which we only retain the anonymised data	We receive the personal data from you directly via the feedback system or from the customer using the feedback system	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
anonymised statistics based on customer feedback. E.g. to generate scores					
<p><b>Sending you the newsletter for our customers</b></p> <p>To send you our newsletter if you are a contact who works at one of our customers</p>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Job title category</li> <li>Whether you click on the links in the e-mail</li> </ul>	Your consent for us to process the personal data to send you the newsletter	We store the personal data for this purpose until you withdraw your consent for the newsletter either by contacting us or using the link included in each newsletter	We receive the personal data from you directly	No
<p><b>Testimonials on our website</b></p> <p>To share your testimonial on our website</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Employer</li> <li>Job title</li> <li>Testimonial</li> </ul>	Your consent to us to process the personal data and to publish your testimonial on our website	We store the personal data for this purpose as long as the testimonial remains relevant for Ctac. If the testimonial is no longer relevant, it will be removed from the website within 6 months and from our database within 2 years	We receive the personal data from you directly	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Measuring efficiency of marketing efforts</b></p> <p>To measure the efficiency of our marketing efforts, we verify which marketing efforts contributed to a deal and the value of the deal. We only process information of customers with more than 50 employees, which is not personal data. The HubSpot ID is connected to a natural person (e.g. the representative) and therefore it is personal data</p>	<p>Employee/representative:</p> <ul style="list-style-type: none"> <li>HubSpot ID</li> </ul>	<p>Our legitimate interest to measure the efficiency and return on investment of our marketing efforts to improve our marketing strategies. Although the interest is of a commercial nature, the impact on the data subject is very limited as only a HubSpot ID is processed on a pseudonymised basis</p>	<p>We store the personal data for this purpose for up to 2 years after the year in which the deal took place</p>	<p>Generated by HubSpot</p>	<p>No</p>

## 5 WHAT PERSONAL DATA WE COLLECT – VISITORS TO OUR WEBSITES AND INTERACTING WITH US

If you visit our websites, interact with us or if you contact us via the website or by other means, we process your personal data. In the table below, we specify which personal data we process for the various processing activities.

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Cookies</b></p> <p>We place various cookies on our website, which may process your personal data as a website visitor</p> <p>For more information about the cookies used by Ctac, please read the <a href="#">cookie statement</a></p>	<p>Cookies to register your consent settings:</p> <ul style="list-style-type: none"> <li>• Cookie/Consent ID</li> <li>• Consent preferences</li> <li>• Date and time of consent</li> <li>• URL where consent was given</li> <li>• User language</li> <li>• Browser and OS information (to separate real from synthetic users)</li> <li>• Geolocation based on IP address (to ensure presentation of the correct banner)</li> </ul> <p>HubSpot cookies to generate analytics to improve our websites:</p> <ul style="list-style-type: none"> <li>• HubSpot ID</li> </ul>	<p>Cookies to register your preferences and to generate statistics are placed based on our legitimate interest to comply with legislation, to provide you with the website and analyse and improve our websites. Other cookies are placed only if you provide your consent via the cookie banner</p>	<p>Personal data is stored for the duration that the cookie is placed. The cookie placement durations are described in our <a href="#">cookie statement</a></p>	<p>The personal data is collected via the cookie from the device of the data subject</p>	<p>Ctac does not transfer your personal data to parties in third countries.</p> <p>However, Ctac cannot guarantee that cookies of third parties process your personal data within the EEA. Ctac has no control over how such third parties processes personal data. Please read the privacy statement</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
	<ul style="list-style-type: none"> <li>• Information about your use of our website</li> <li>• Device and browser information</li> <li>• Date, time and duration of your visit to our website</li> </ul> <p>HubSpot cookies to register your interest in Ctac and to track whether you were served a Ctac ad and clicked on the ad:</p> <ul style="list-style-type: none"> <li>• HubSpot ID</li> <li>• Information about your use of our website</li> <li>• Device and browser information</li> <li>• Date, time and duration of your visit to our website</li> <li>• If you were served a Ctac ad and if you clicked on it</li> </ul> <p>Please be aware that Ctac is not able to access and does not process personal</p>				<p>of the third party for more information prior to giving your consent.</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
	<p>data of the following cookies:</p> <ul style="list-style-type: none"> <li>• <a href="#">Cloudflare</a></li> <li>• <a href="#">LinkedIn</a></li> <li>• <a href="#">Facebook/Meta</a></li> <li>• <a href="#">Google/YouTube</a></li> <li>• <a href="#">Bing</a></li> </ul> <p>For more information about how these parties process personal data, please read their respective privacy statements (links provided above)</p>				
<p><b>Security of the website</b></p> <p>We process your personal data to secure our website against threats and attacks</p>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Date and time of acts</li> <li>• Pages visited on our website</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation to secure our networks, software and data</li> <li>• Our legitimate interests to operate our business, protect our networks, software and data and to fulfil our contractual obligations towards our clients</li> </ul>	<p>We store your personal data for this purpose for up to 1 month after the personal data has been collected, except if you submit a form in which case the personal data is stored as long as the form is stored</p>	<p>The personal data is collected by our website</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
		and our legal obligations			
<p><b>Contact form</b></p> <p>You are able to contact us via various contact forms. If you contact us, we process your personal data</p>	<ul style="list-style-type: none"> <li>Name</li> <li>HubSpot ID</li> <li>Job title category</li> <li>Employer</li> <li>Contact information</li> <li>Correspondence</li> <li>From which page you submit the contact form</li> </ul>	Our legitimate interests to be able to reply to your contact requests. Contacting us via a contact form is optional	We store the personal data for this purpose for up to 3 years after the last contact with you, or for up to 6 months after we have been informed that you no longer work for the customer, supplier or prospect	We receive the personal data from you directly or from one of your colleagues. The HubSpot ID is generated by HubSpot	No
<p><b>Marketing communications and newsletters</b></p> <p>We may approach you with marketing communications and newsletters if you sign up for this. We offer various newsletters, such as the standard newsletter, a newsletter for</p>	<p>For marketing communications:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Job title category</li> <li>E-mail address</li> <li>Whether you click on the links in the e-mail</li> <li>Interactions with Ctac (e.g. attending an event or downloading a whitepaper)</li> </ul> <p>For newsletters</p> <ul style="list-style-type: none"> <li>E-mail address</li> <li>Whether you click on the links in the e-mail</li> </ul>	Your consent to us to process the personal data to send you the newsletter and marketing communications	We store the personal data for this purpose until you withdraw your consent for the newsletter and marketing communications either by contacting us or using the link included in each newsletter	We receive the personal data from you directly	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
investor relations and a newsletter for Winshuttle					
<p><b>Downloading a whitepaper</b></p> <p>You can request and download whitepapers from our website. In such a case, we process your personal data to be able to investigate potential leads</p>	<ul style="list-style-type: none"> <li>• HubSpot ID</li> <li>• E-mail address</li> <li>• Company name</li> <li>• Job title category</li> <li>• Whether you click on the links in the e-mail</li> </ul>	Our legitimate interest to investigate potential leads. Downloading whitepapers is optional	We store the personal data for this purpose for up to 3 years after the whitepaper has been downloaded	We receive the personal data from you directly or from one of your colleagues. The HubSpot ID is generated by HubSpot	No
<p><b>Event invites and attendance</b></p> <p>We organise events for our relations. If you wish to be invited to such events or if you wish to attend such events, we process your personal data</p>	<ul style="list-style-type: none"> <li>• HubSpot ID</li> <li>• Name</li> <li>• Contact information</li> <li>• Employer</li> </ul>	Your consent for us to invite you to our events	We store the personal data for this purpose for up to 6 months after the event has taken place	We receive the personal data from you directly or from one of your colleagues. The HubSpot ID is generated by HubSpot	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Pictures during events</b></p> <p>If you attend our events, you may be recorded or photographed. These recordings and photographs may be used for marketing purposes such as uploading them on our website, in our marketing folders and on our social media accounts</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact information</li> <li>Signature</li> <li>Photograph/recording</li> </ul>	Your consent to us to allow us to use photographs and/or recordings in which you are visible for our marketing purposes	We store the personal data as long as the photograph/recording remains online, to allow us to demonstrate we have received valid consent. The photograph remains online as long as this is relevant for Ctac or until you withdraw your consent	From you directly and/or via the photographer	<p>Ctac itself does not transfer the image to third countries.</p> <p>However, the image may be used online and on social media, which may result in the image being processed outside of Europe and outside of Ctac's control. Please be aware of this prior to giving your consent.</p>
<p><b>To assess which companies visit our website and to establish a HubSpot score</b></p> <p>We create a HubSpot score between 0 and 100 for a company</p>	<p>From the company:</p> <ul style="list-style-type: none"> <li>HubSpot score</li> <li>Information from the Chamber of Commerce</li> <li>Telephone number of the company</li> </ul> <p>From the employee of the company:</p>	Your personal data is processed based on our legitimate interest to be able to identify and approach leads that have shown interest in Ctac's services. Although the interest is of a	We store the personal data for this purpose for up to 3 years after the last contact with you or your last interaction with Ctac, or for up to 6 months after we have been informed that you no	The personal data is gathered via our website. The HubSpot ID is generated by HubSpot and the information regarding the company is	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>based on the data points mentioned in this privacy statement to assess if it may be an interesting lead for Ctac to approach. If the HubSpot score reaches 100, the lead will be passed to the sales team to be approached by Ctac</p>	<ul style="list-style-type: none"> <li>• HubSpot ID</li> <li>• Employer</li> <li>• Events and webinars attended</li> <li>• Downloaded whitepapers</li> <li>• Interactions with Ctac</li> <li>• Newsletters subscribed to</li> <li>• Correspondence with Ctac (the content of the correspondence is not used to determine the HubSpot score)</li> <li>• Visits and behaviour on the Ctac website (if marketing cookies are accepted)</li> <li>• Via which pages the Ctac website was accessed (e.g. via an advertisement or via a search engine)</li> </ul>	<p>commercial nature, the impact on the data subject is very limited as personal data is processed on a pseudonymised basis (the HubSpot ID) and the information is processed on a company level</p>	<p>longer work for the customer, supplier or prospect</p>	<p>received from the Chamber of Commerce</p>	
<p><b>Providing leads to the sales team</b></p> <p>If you have shown interest in our services as</p>	<ul style="list-style-type: none"> <li>• Company name (only if your company has over 50 employees)</li> <li>• Telephone number</li> </ul>	<p>Your company name is processed based on our legitimate interest to be able to approach leads that have shown interest in Ctac's</p>	<p>Personal data is not stored for this purpose as it is a one-off provision of the personal data</p>	<p>The personal data is gathered in HubSpot, as described above</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>established via the HubSpot score (as described above), we may process your company name. If you decide to share your telephone number with us so that we can contact you with an offer, we will process your personal data for this purpose</p>		<p>services. Although the interest is of a commercial nature, the impact on the data subject is very limited as only a company name is processed and such a name is generally available and not considered personal data</p> <p>Your telephone number is processed if you share your telephone number with us voluntarily</p>			

## 6 WHAT PERSONAL DATA WE COLLECT – JOB APPLICANTS

If you apply for a job at Ctac, we will process your personal data. In the table below, we specify which personal data we process for the various processing activities.

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Processing applications</b></p> <p>To process your job application, we process your personal data to verify your suitability for the job, to interview you and to manage the job application process</p> <p>We may also share your personal data with other entities in the Ctac group, if there are relevant positions for you there and if you give us permission to do so</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact information</li> <li>• CV</li> <li>• Motivation letter</li> <li>• Availability</li> <li>• Any other personal data you choose to share with us</li> </ul>	<p>Our legitimate interests to process your application, to manage the job application process and to assess your suitability for the job you applied for</p>	<p>We store the personal data for this purpose for up to 4 weeks after the job application process has been completed or for up to 1 year if you request us to retain your data</p>	<p>We receive the personal data from you directly</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Reference checks</b></p> <p>Depending on the job you are applying for, we may request to check your references. We will process the personal data of the reference you share with us. It is important that you first obtain consent from your reference to share their contact details with us</p>	<p>Reference:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Contact information</li> <li>Job title</li> <li>Employer</li> </ul> <p>Job applicant:</p> <ul style="list-style-type: none"> <li>Personal data shared by the reference (such as information about your performance)</li> </ul>	<p>Reference:</p> <ul style="list-style-type: none"> <li>Consent of the reference, which must be obtained by the job applicant</li> </ul> <p>Job applicant:</p> <ul style="list-style-type: none"> <li>Our legitimate interests to process your application, to manage the job application process and to assess your suitability for the job you applied for</li> </ul>	<p>We store the personal data for this purpose for up to 4 weeks after the job application process has been completed or, only regarding personal data shared by the reference about the job applicant, for up to 1 year if the job applicant requests us to retain this data</p>	<p>Reference:</p> <ul style="list-style-type: none"> <li>We receive the personal data from the job applicant</li> </ul> <p>Job applicant:</p> <ul style="list-style-type: none"> <li>We receive the personal data from the reference</li> </ul>	No
<p><b>LinkedIn checks</b></p> <p>If you apply for a job at Ctac, we will verify if you have a LinkedIn profile to verify whether the information in your CV matches your LinkedIn profile and to assess if additional information</p>	<ul style="list-style-type: none"> <li>Name</li> <li>LinkedIn profile and any personal data contained therein</li> </ul>	<p>Our legitimate interests to process your application, to manage the job application process and to assess your suitability for the job you applied for</p>	<p>We do not store your personal data for this purpose</p>	<p>We gather the personal data from your LinkedIn profile</p>	No

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
is available on your LinkedIn profile					
<p><b>Assessments</b></p> <p>Certain sensitive jobs require you to complete an assessment as part of the application process</p> <p>Your personal data will be shared with the assessment agency, Quaestus</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact information</li> <li>Performance and job history</li> <li>Results following from the assessment, including characteristics regarding your personality</li> </ul>	<p>Our legitimate interests to process your application, to manage the job application process and to assess your suitability for the job you applied for. Assessments are only used for very sensitive jobs or jobs in higher management</p>	<p>We store the personal data for this purpose for up to 4 weeks after the job application process has been completed or for up to 1 year if you request us to retain your data</p> <p>If you are hired for the job, we will retain your assessment results for a longer period of time. For more information, we refer to the internal privacy statement for Ctac employees</p>	<p>We receive the personal data from you directly, except for the assessment results which we receive from the assessment agency</p>	<p>No</p>

## 7 WHAT PERSONAL DATA WE COLLECT – OTHER

Below we describe for which processing purposes we may process your personal data, despite your role as data subject. For example, visitor registration may apply to employees of our customer but also to our job applicants or other types of visitors. The personal data mentioned below is generally available to us because this personal data has been shared by you for the purposes described above. If you refuse to share your personal data with us for these purposes, we cannot conclude a contract with you or your employer and we may not be able to communicate with you or comply with our obligations towards you.

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Audits</b></p> <p>We may be subject to audits for certifications or by our customers or conduct internal audits to verify if we comply with our various requirements. If we process your personal data, this personal data may be processed by the auditor if this is strictly necessary for the audit. We will anonymise or pseudonymise your</p>	<ul style="list-style-type: none"> <li>All personal data described in this privacy statement may be included in the audit, but only insofar as necessary</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation to conduct audits</li> <li>Our legitimate interests to operate our business, to be able to comply with contractual agreements concluded with customers, to (verify that we) comply with legislation, to gain certifications and to verify that we comply with modern security requirements</li> </ul>	<p>We store the personal data for up to 2 years after the audit took place or, if storing personal data is an audit requirement, for up to 2 years after expiry of such term</p>	<p>This depends on the type of personal data we processed. This is described per type of personal data in this table</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>data as much as possible before sharing it with the auditor</p> <p>Your personal data may be shared with the auditor</p>					
<p><b>Back-ups</b></p> <p>We create back-ups of our data. This will also include your personal data if we process your personal data. This data is stored encrypted and is not generally accessible. We will only use a back-up in case there is an unintended loss of data which cannot be solved in another way</p>	<ul style="list-style-type: none"> <li>All personal data as described in this privacy statement</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation to create back-ups</li> <li>Our legitimate interests to operate our business, to be able to comply with contractual agreements concluded with customers, to comply with legislation and to prevent unnecessary loss of data</li> </ul>	<p>We store the personal data for up to 7 years after the back-up has been created, except in case of an incident for which the back-up is required in which case the back-up will be stored until the incident has been handled</p>	<p>This depends on the type of personal data we processed. This is described per type of personal data in this table</p>	<p>No</p>
<p><b>Security and monitoring</b></p>	<p>E-mail scanning:</p> <ul style="list-style-type: none"> <li>E-mail address</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation to secure our</li> </ul>	<p>E-mail scanning is done automatically and personal data is stored</p>	<p>In case of e-mail scanning and the secure file</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>We take various measures to secure our services and the data that we process. We scan incoming e-mail to detect threats (e.g. viruses and phishing), we have a secure file exchange and we register visitors to our offices</p>	<ul style="list-style-type: none"> <li>• Metadata of the e-mail (e.g. date of sending the e-mail)</li> <li>• Content of the e-mail</li> </ul> <p>Secure file exchange:</p> <ul style="list-style-type: none"> <li>• Shared files</li> <li>• E-mail address</li> <li>• IP address</li> </ul> <p>Office visitors:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Employer</li> <li>• Signature</li> </ul>	<p>networks, software and data</p> <ul style="list-style-type: none"> <li>• Our legitimate interests to operate our business, protect our networks, software and data and to fulfil our contractual obligations towards our clients and our legal obligations</li> </ul>	<p>for up to 1 year after the e-mail has been scanned</p> <p>We store the personal data for the secure file exchange for up to 14 days after the exchange has taken place</p> <p>We store the personal data for office visits for up to 6 months after the visit has taken place</p>	<p>exchange, we gather the personal data from our systems. In case of office visitors, the personal data is received from you directly or from one of your colleagues</p>	
<p><b>CCTV</b></p> <p>We may record images of you via CCTV if you visit and access Ctac's locations</p>	<ul style="list-style-type: none"> <li>• The recording</li> <li>• Metadata related to the recording (e.g. location and timestamps)</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interest in complying with our legal obligation to secure our services and (sensitive) data and being able to secure your and our services, data, locations and property and to investigate incidents</li> </ul>	<p>For up to 30 days after the recording has been made. In case of an incident, the relevant recordings will be stored until the incident has been handled</p>	<p>The recordings are generated by the cameras of Ctac</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p><b>Incident investigation</b></p> <p>If an incident has occurred, Ctac may process your personal data if this is relevant for the investigation or handling the incident</p>	<ul style="list-style-type: none"> <li>All personal data described in this privacy statement may be included in the investigation, but only insofar as necessary</li> </ul>	<ul style="list-style-type: none"> <li>Necessary to pursue our legitimate interest in being able to investigate incidents</li> </ul>	<p>In case of an incident, the personal data processed for investigating and handling the incident will be stored until the incident has been handled</p>	<p>As described in this privacy statement for the various personal data</p>	<p>No</p>
<p><b>Government requests and court orders</b></p> <p>We may receive requests from government authorities or court orders which oblige us to share your personal data with them or a party designated in the order. We will inform you of such orders prior to sharing your personal data, unless the order</p>	<ul style="list-style-type: none"> <li>All personal data described in this privacy statement may be included in the request, but only insofar as Ctac is obliged to provide the personal data</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation to comply with the order</li> <li>Our legitimate interests to be able to comply with lawful orders and legislation</li> </ul>	<p>We store the personal data until the order has been fulfilled and any terms of appeal or objection have expired</p>	<p>This depends on the type of personal data we processed. This is described per type of personal data in this table</p>	<p>No, unless the entity with whom we must share your personal data is located outside of the EEA. The transfer mechanism upon which we will rely depends on the entity with whom we share your personal data and the country in which the entity is located.</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>forbids us from doing so</p> <p>Your personal data may be shared with the authority, court or other party designated in the order</p>					
<p><b>Mergers and acquisitions</b></p> <p>If we process your personal data, we may also process your personal data if we merge with another company, if we acquire another company or if we are acquired by another company. Your personal data will only be processed if this is strictly required for the transaction or the due diligence</p>	<ul style="list-style-type: none"> <li>All personal data described in this privacy statement may be processed to successfully complete the transaction, but only insofar this is necessary to achieve the desired result. If possible Ctac will anonymise your personal data</li> </ul>	<p>Our legitimate interests to operate our business, to be able to comply with contractual agreements concluded with other parties, to comply with legislation and to prevent unnecessary risk and damage from occurring to Ctac or other parties</p>	<p>We store the personal data for up to 5 years after the transaction has been completed or for the duration of relevant indemnities and warranties for which your personal data is crucial to be able to invoke or defend against such warranties and indemnities</p>	<p>This depends on the type of personal data we processed. This is described per type of personal data in this table</p>	<p>No, unless the other party is located outside of the EEA in which case we will rely on an adequacy decision of the European Commission. If such an adequacy decision is not available, we will rely on standard contractual clauses and conduct a transfer impact assessment to verify if the transfer</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
<p>investigation. In such cases, we will anonymise and pseudonymise your personal data where possible</p> <p>Your personal data may be shared with the target company or purchaser, involved lawyers and accountants and other parties involved in the transaction</p> <p>Due to the confidential nature of the processing activity, you will not be informed separately prior to your personal data being processed for this purpose. Insofar as we are allowed to</p>					<p>is allowed under the GDPR</p> <p>When you are informed about the processing activity and the transfer is based on standard contractual clauses, you may request access to those clauses and our transfer impact assessment by contacting us via the contact details included in this privacy statement</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
do so, we will inform you afterwards					
<p><b>Conflict management</b></p> <p>If there is a (legal) conflict of which you are an essential part and we process your personal data, your personal data may be processed if necessary for settling and managing the conflict. For example, if you are the employee or representative who negotiated the contract on behalf of the customer with whom we have a conflict</p> <p>Your personal data may be shared with involved lawyers, courts and other</p>	<ul style="list-style-type: none"> <li>All personal data as described in this privacy statement, insofar as necessary for settling the conflict</li> </ul>	<p>Our legitimate interests to be able to manage and settle conflicts and to exercise our rights</p>	<p>We store the personal data for up to 7 years after the conflict has ended and all obligations of parties have been fulfilled</p> <p>If the conflict has been settled by a court and a judgment has been given, the personal data will be stored for the limitation period</p>	<p>This depends on the type of personal data we processed. This is described per type of personal data in this table</p>	<p>No</p>

Purpose/Activity	Personal Data Processed	Lawful Basis for Processing	Retention Period	How do we receive the personal data	Transfer of personal data to third countries
involved judicial professionals (e.g. the bailiff) if necessary for resolving the conflict					
<p><b>Complying with GDPR requests</b></p> <p>You may exercise your rights under the GDPR. We must process your personal data when complying with your request. We will only process the personal data which is necessary to comply with your request</p>	<ul style="list-style-type: none"> <li>Personal data to identify you. The specific types of personal data we process to identify you depend on the personal data we have available (such as your name and e-mail address)</li> <li>All personal data as described in this privacy statement, insofar as necessary to comply with your request</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation to comply with GDPR requests</li> <li>Our legitimate interests to comply with our legal obligations</li> </ul>	We store the personal data for up to 2 years after the request has been fulfilled	This depends on the type of personal data we processed. This is described per type of personal data in this table	No

## 8 WHAT IF YOU REFUSE TO PROVIDE US WITH PERSONAL DATA?

If the table above states that we need to process your personal data to comply with the law or to perform an agreement with you or the company you work for, we may not be able to provide you with our services if you refuse to provide us with the required personal data.

## 9 THIRD PARTIES

- 9.1 If we share your personal data with other data controllers, this is mentioned in the table above for the relevant processing purpose (e.g. that we share our financial administration with our accountant). We may also engage processors, which process your personal data on our instruction and behalf. We agree with such parties that they may not process your personal data for their own purposes. Such parties are software and hosting providers, such as Microsoft.
- 9.2 Our websites, tools and software may link or redirect to other websites, software or other content which is not under our control. Such links or redirections are not endorsements of such websites or representations of our affiliation with them. Such third-party websites are outside the scope of this statement. If you access such third-party websites, please ensure that you are satisfied with their respective privacy statements before you provide them with any personal data. We cannot be held responsible for the activities, privacy statements or levels of privacy compliance of any website operated by any third party.

## 10 USE OF ARTIFICIAL INTELLIGENCE

We may use generative artificial intelligence (AI) to process your personal data for the purposes mentioned above (e.g. Microsoft Copilot). Before doing so, we will first conduct a risk assessment and take mitigating measures. We will only use AI in case the assessment shows that there are no high risks for your personal data. The provider of the AI will be subject to strict security and privacy requirements. We will agree with the provider of the AI that they may only process your personal data on our instruction. Your personal data will not be used to train the AI and we will ensure your personal data remains in the EEA. We implement short retention periods to ensure that your data is not stored unnecessarily in the AI. Our staff will also be adequately trained on the use of AI, the risks involved with the use of AI and will receive clear instructions on using personal data in AI.

## 11 SECURITY OF YOUR PERSONAL DATA

- 11.1 For as long as we process your data, we follow generally accepted industry standards. We maintain safeguards to attempt to ensure the security, integrity, and privacy of the information we process.
- 11.2 It is important that you keep secure and confidential any login credentials that you have for the services provided by Ctac. You are responsible for maintaining the security and confidentiality of such login credentials. You should notify us promptly if you become aware that the security or confidentiality of your login credentials is compromised.

## 12 COOKIES

Our websites and portals use cookies as detailed in the [cookie statement](#).

## 13 YOUR RIGHTS AS A DATA SUBJECT

13.1 In accordance with the GDPR, you have certain rights to protect your privacy. Below you will find more details and information on how and when to exercise your rights:

- The right to access your personal data. This gives you the right to receive a copy of the personal data we process about you in capacity of data controller. This allows you to check whether the data is correct and whether we process it lawfully.
- The right to request that your personal data be corrected or updated. You can have any incomplete or incorrect personal data that we hold amended or completed.
- The right to request the deletion of your personal data. You can request deletion of your personal data, but only if:
  - your personal data are no longer needed for the purposes for which they were collected;
  - you withdraw your consent if the processing of your personal data is based on consent and no other legal basis exists;
  - you object to the processing of your personal data and we do not have a compelling legitimate ground for processing;
  - your personal data are processed unlawfully; or
  - your personal data must be removed to comply with a legal obligation.

If we grant your request, we will, to the extent reasonably possible, inform the parties with whom we share your personal data.

- The right to object to the processing of your personal data. If we process your personal data on the basis of a legitimate ground for processing, you may object to us processing your personal data for such legitimate ground. We will comply with your request, unless our legitimate interest outweighs your interests or if we need to continue processing your personal data to establish, exercise or defend a legal claim or to comply with our legal obligations.
- The right to restrict the processing of your personal data. You can request us to restrict the processing of your personal data, in the event that:

- the accuracy of your personal data is disputed by you, during the period in which we need to verify the accuracy of the personal data;
  - the processing is unlawful and you oppose the deletion of your personal data and request its restriction;
  - we no longer need your personal data for the purposes of processing, but your personal data are necessary for you in the context of a legal claim; or
  - you have objected to the processing, during the period in which we have to verify compelling legitimate grounds.
- The right to data portability. You can request us to receive your personal data and/or to send it to a third party, as far as this is feasible. You only have this right if it concerns personal data that you have provided to us and the processing is based on consent or based on the necessity for the performance of our contract with you.

13.2 We do not make decisions based solely on automated processing.

13.3 For further information, or to exercise any particular right, please contact us at [privacy@ctac.nl](mailto:privacy@ctac.nl).

## 14 QUESTIONS AND COMPLAINTS

14.1 We take our data protection obligations seriously. If you have any questions or complaints about this statement or the way that we handle your personal data, please contact us first. We would appreciate the chance to deal with your concerns before you approach the relevant data protection authority. Please contact us via [privacy@ctac.nl](mailto:privacy@ctac.nl).

14.2 You have the right to make a complaint at any time to any relevant supervisory authority for data protection issues. In the Netherlands this is the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) (<https://www.autoriteitpersoonsgegevens.nl>).

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