

# Privacy Statement

NFIR B.V.

**Date:** 17<sup>th</sup> June  
2019

## 1 Introduction

NFIR B.V. (hereafter: NFIR) with its current place of business at Verlengde Tolweg 2, The Hague, is responsible for the processing of personal data as described in this privacy statement. NFIR operates strictly in accordance with the Privacy Code of Conduct for Private Investigation Agencies of the Security Sector Association of the Netherlands [*Nederlandse Veiligheidsbranche*] and is subject to the Dutch Data Protection Authority [*Autoriteit Persoonsgegevens* or *AP*] Should you have any complaint about NFIR, please refer to our complaints procedure.

## 2 What personal data is processed by NFIR?

NFIR processes your personal data because you make use of our services and/or you have provided us with your data yourself. There may be a difference in the personal data that is processed depending on the service provided. The personal data which NFIR may process are:

- First name and surname
- Gender
- Date of birth
- Place of birth
- Address
- Telephone number
- E-mail address
- IP address
- Other personal data which you have actively provided yourself in correspondence or by telephone, for example.
- Location details
- Internet browser and type of device
- Bank account number

NFIR may also record the following special and/or sensitive personal data:

- Ethnicity
- Religion or belief
- Political preference
- Sex life
- Union membership
- Health
- Criminal record
- Credit check



- Details of persons under the age of 16
- Citizen security number [*Burgerservicenummer* or *BSN*]
- Biometric data
- Genetic data

### 3 For what purposes does NFIR process personal data?

NFIR processes your personal data primarily to carry out assignments that you have given it, for invoicing and processing your payment and in order to contact you in respect of NFIR's service provision. Carrying out assignments includes:

- ICT scans in order to maintain the correct level of security
- The digital forensic investigation of people
- Searching for evidence of computer intrusion and/or theft
- Investigating company and other fraud
- Providing the client with preventative advice.

NFIR also processes your personal data for the following reasons:

- The creation of an electronic dossier detective investigations
- Archiving the results of investigations
- Carrying out investigation administration.

NFIR may also use your personal data to send the NFIR Newsletter if you have given u permission to do so. NFIR is also required to process personal data that is necessary for its tax return.

### 4 Does NFIR make use of automated decision-making?

NFIR only makes use of automated decision-making for its Security Monitoring service. These decisions are those that are taken by computer programmes or systems without the intervention of a person (such as an employee of NFIR). In Security Monitoring, NFIR's software attributes a certain classification to events in the client's network, notifying the client of that classification by email, text message or app.

## 5 How long does NFIR retain personal data?

NFIR stores your personal data no longer than is strictly necessary in order to achieve the purposes for which the data is collected. NFIR applies the following periods for retaining information:

Information retention period	
Financial information (for the tax authorities)	7 years
Results of forensic investigation	3 years (standard)*
Results of Phishing investigation	1 month*
Results of, and reports by, Security Monitoring	2 years*
Commercial data and contact person details for NFIR clients Indefinitely*	

*\*May vary at the request of the client*

## 6 Does NFIR share personal data with third parties?

NFIR will not sell your data to third parties and only discloses it if it is necessary for the performance of our contract with you or to comply with a legal obligation. We enter into a processing agreement with companies that process your data on our instructions in order to ensure the same level of security and confidentiality. NFIR remains responsible for this processing.

## 7 Does NFIR use cookies or similar technology?

NFIR makes use of standard cookies, i.e. functional and analytical cookies, which cannot be traced back to visitors. Only IP addresses, which are partially masked, are analyzed. A visitor to the website does not have to grant permission for these cookies for this reason.

The analytical cookies that NFIR uses are Google Analytics cookies. NFIR has entered into a processing agreement with Google and has switched off the function 'share details'. The information that is collected by these cookies cannot be traced back to visitors, because the last octet of the IP address is masked. Furthermore, NFIR does not make use of other Google services in combination with Google Analytics cookies.

## 8 Access to, and amendment and deletion of, data

You have the right of access to your personal data and to correct or delete it. You also have the right to withdraw any permission for, or object to, the processing of your personal data by NFIR and you also have the right of data portability. This means

that you can also submit a request to us to send the personal data we have in a computer file to you or to another organisation nominated by you. The above rights do not apply to you if your personal data has been collected and processed in the conduct of a digital forensic investigation. These details can only be deleted if the commissioning party for the forensic investigation makes the request to delete all investigation data and the report.

You can submit a request for access, correction, deletion or transfer of your personal data or withdraw your permission for, or object to, the processing of your personal data to [fg@nfir.nl](mailto:fg@nfir.nl). In order to be certain that it is, indeed, you who has sent the request, please include a copy of a proof of identity with it. Make sure that your photo, MRZ (machine-readable zone, the strip with numbers at the bottom of your passport), passport number and any citizen service number [*Burgerservicenummer* or *BSN*] cannot be seen in order to protect your privacy. NFIR will respond within twenty days of your request. NFIR would also like to draw your attention to your right to submit a complaint to the national authority for data protection, the Dutch Data Protection Authority [*Autoriteit Persoonsgegevens*]. You can do so via the following link [in Dutch]:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

## 9 How we protect personal data

NFIR takes protecting your details seriously and takes appropriate measures against misuse, loss, unauthorized access, accidental disclosure and unauthorized changes. If you feel that your data is not well protected or if there are indications of misuse, please get in touch with NFIR's Data Protection Officer (DPO) using the contact details below.

## 10 Contact information

For questions relating to your personal data, please make contact with NFIR's DPO.

The contact details are:

*Address:* Verlengde Tolweg 2  
2517 JV The Hague

The Netherlands

*Telephone number:* +31 (0) 88 – 323 02 05

*Email address:* [fg@nfir.nl](mailto:fg@nfir.nl)





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