

Privacy policy Circular IT group

Version 27 June 2025

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Introduction and Scope

This Privacy Policy is applicable for the companies operating under the name of the Circular IT group

CITG Netherlands B.V., established at Radonstraat 300, 2718 TB Zoetermeer, Netherlands, with Chamber of Commerce number 27195138, also operating under the names Circular IT group and Maxicom.

NEG-ITSolutions B.V. (NEG), established at Celciusbaan 2A, 3439 NC Nieuwegein, Netherlands, with Chamber of Commerce number 30157166, also operating under the names Circular IT group.

Computer Trading company B.V., established at Celciusbaan 2A, 3439 NC Nieuwegein, Netherlands, with Chamber of Commerce number 30192945, also operating under the names ICTlifecycle, CTC-ITSolutions and Circular IT group.

Re-Tek (UK) Ltd., established at Hurlawcrook Place, East Kilbride, G75 0AP United Kingdom, with Chamber of Commerce number 03209888, also operating under the name Circular IT group.

IARENT B.V., established at Celciusbaan 2A, 3439 NC Nieuwegein, Netherlands, with Chamber of Commerce number 32103372, also operating under the name Circular IT group.

Digital Deploy B.V., established at Celciusbaan 2A, 3439 NC Nieuwegein, Netherlands, with Chamber of Commerce number 84772689, also operating under the name Circular IT group.

Close The Gap Circular BV (CTG circular), established at Veldkant 21, 2550 Kontich, Belgium, with Chamber of Commerce number 465143506, also operating under the name Circular IT group.

This Privacy Policy applies to all individuals who interact with Circular IT group, excluding its employees. Specifically, this Privacy Policy applies to:

- Clients, visitors, job applicants, clients, contractors (including freelancers and suppliers, insofar as they are natural persons), and other contacts of Circular IT group;
- Visitors to the website of Circular IT group or any domain name linked to this domain name.

All these individuals are collectively referred to as "you" and "your." The words "we," "us," and "our" refer to Circular IT group. Concerning the processing of your Personal Data, Circular IT group qualifies as the Data Controller. Chapter 1 defines various terms, which are capitalized throughout the Privacy Policy.

We consider the careful handling of your Personal Data a priority. Naturally, we comply with all legal regulations, including the General Data Protection Regulation (GDPR), and take necessary measures to safeguard your Personal Data appropriately.

Please review this Privacy Policy carefully. For readability, the general part of the Privacy Policy is divided into chapters, and the table of contents is provided above.

This Privacy Policy was last updated on and has been in effect since **1 July 2025**

1. DEFINITIONS

Data subject:	The individual to whom the Personal Data being processed relates. In other words, the person whose personal data is being processed.
Third Parties:	Natural or legal persons who are neither Data Subjects nor part of Circular IT group, such as individuals or organizations with whom Circular IT group shares Personal Data due to an agreement. These third parties may act as processors or joint controllers.
Personal Data:	All information related to an identified or identifiable person. In other words, any data that identifies or can be used to identify the Data Subject.
Processing:	Any action that can be performed on Personal Data, such as collecting, recording, storing, modifying, retrieving, using, sharing, or destroying it.
Data Controller:	The entity responsible for processing Personal Data for a specific purpose. In this Privacy Policy, the Data Controller is Circular IT group.

2. PERSONAL DATA WE MAY PROCESS

Below, we explain the types of Personal Data that Circular IT group may process about you:

Data you provide yourself, such as:

- Your contact details (name, address, city, email address, phone number);
- Your gender and date of birth;
- Data collected during a phone conversation with you;
- Data collected from an email you sent us;
- Login details;
- Payment details;
- Data from your resume or regarding your employment history.

Data received via our websites, newsletters, and emails, such as:

- Information about the device you used to visit our website;
- Your browsing behavior on the website, such as which pages you viewed, how you navigated through the website, whether you opened a newsletter or email and clicked on any parts, and the dates and times of your website visit;
- The operating system you use;
- Your browser type and IP address;
- Your internet service provider;
- The internet address of the referring website;
- Your geolocation;
- Data you downloaded from the website.

Data received from other sources, such as:

- Video footage (at locations where signs are placed indicating the presence of security cameras);
- Data from publicly available sources or data you have explicitly made public, such as on social media and commercial websites;
- Data obtained from the Chamber of Commerce Trade Register or the Land Registry.

3. Why We Process Your Personal Data

We process your Personal Data for the following purposes:

- To verify your identity;
- To process your orders, keep you informed about the status of your order, and ensure your orders are handled as smoothly as possible;
- To improve our services, including their security, by conducting checks and enabling evaluations, research, and further development;
- To personalize the website for you and recommend products you may find interesting;
- To publish product reviews on our websites;
- To process a discount response and measure the effectiveness of marketing campaigns if you respond to a sales discount;
- To inform you about news and developments at Circular IT group;
- To contact you with newsletters if you have subscribed;
- For internal quality purposes;
- To manage, secure, adjust, and improve our websites;
- For marketing/commercial purposes;
- For recruitment and selection;
- To comply with legal obligations imposed on Circular IT group;
- To contact you and respond to questions or complaints you have submitted;
- To handle your requests for information and resolve complaints;
- To prevent theft, misuse, vandalism, or other criminal behavior;
- For educational purposes;
- To conduct satisfaction surveys.

4. LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

Under the GDPR, we must have a valid legal basis for using your Personal Data. Circular IT group uses the following legal bases:

- You have explicitly given your consent to Circular IT group;
- The processing is necessary to perform or enter into a contract with you;
- The processing is necessary to comply with a legal obligation;
- In emergencies, the processing is necessary to protect your vital interests or those of another person;
- We have a legitimate interest in the processing, unless this interest is outweighed by your interest or that of a third party in privacy.

When we rely on your consent for processing, we will request it separately. You can withdraw your consent at any time. Withdrawal does not affect the legality of data processing conducted before the withdrawal.

Legitimate Interests:

Circular IT group may rely on the following legitimate interests:

- Safeguarding your security;
- Protecting the security of customers, others, and Circular IT group's property;
- Quality and training purposes;
- Enhancing IT management and improving security;
- Analyzing and improving website services and content;
- Delivering, improving, customizing, supporting, researching, and analyzing our services;
- Enhancing service quality and safety;
- Communicating with you and other Circular IT group contacts;
- Preventing and combating fraud, unauthorized use, violations of policies, and other harmful or illegal activities.

5. SHARING PERSONAL DATA WITH THIRD PARTIES

We share your Personal Data with Third Parties only when necessary because these Third Parties perform activities on behalf of Circular IT group and exclusively for the purposes described in this Privacy Policy. When engaging a Third Party, Circular IT group ensures that the Third Party maintains the same level of security and confidentiality as we do.

Circular IT group may engage contractors in the following categories:

- IT management;
- Website management;
- Website hosting;
- Email communication.

Circular IT group remains responsible for the processing of your Personal Data. Circular IT group enters into agreements with Third Parties to ensure that your Personal Data is adequately protected.

Circular IT group may share your Personal Data with a Third Party, such as a potential buyer or seller, due to a merger, acquisition, or sale of all or part of its organization. We will notify you of this via a prominently visible announcement on our website.

6. SHARING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Sometimes, it may be necessary to transfer your Personal Data to Third Parties located outside the European Economic Area ("EEA"). Circular IT group will only transfer your Personal Data to countries outside the EEA in compliance with the GDPR, in the following situations:

- The European Commission has determined that the third country ensures an adequate level of protection;
- Appropriate safeguards are in place, ensuring enforceable rights and effective legal remedies for you;
- The transfer is necessary for the execution of your contract with Circular IT group;
- You have explicitly consented to the transfer after being informed of the associated risks;
- The transfer is necessary for important reasons of public interest; or
- The transfer is occasional and required by the compelling interests of Circular IT group, provided appropriate safeguards have been implemented and the supervisory authority has been informed.

In cases where Circular IT group transfers your Personal Data outside the EEA, we take measures to ensure adequate protection in accordance with applicable data transfer laws, such as executing model contracts approved by the European Commission and assessing whether additional measures are necessary to guarantee a suitable level of protection.

7. SECURITY

Circular IT group takes the protection and security of your Personal Data very seriously and continuously implements measures to safeguard it against misuse. These include:

- Limiting access to Personal Data to authorized personnel only, keeping the number as small as possible;
- Requiring all Circular IT group employees to sign confidentiality agreements, committing to full discretion concerning all information, including Personal Data;
- Transmitting Personal Data electronically through secure connections;
- Sharing your Personal Data with Third Parties only when adequate security arrangements have been agreed upon.

8. YOUR RIGHTS

If your Personal Data is processed, you are entitled to several rights, as outlined below. You can exercise these rights by submitting your request in writing to Circular IT group or emailing privacy@circularitgroup.com. Circular IT group will verify your identity before fulfilling your request.

Circular IT group will respond to your request as soon as possible and no later than one month after receipt. Requests are generally processed electronically unless otherwise requested or not feasible. Circular IT group will not charge fees for handling these requests unless they are excessive.

1. Access to Personal Data

You may request information at any time regarding which (categories of) Personal Data Circular IT group processes, for what purposes, their source, and the retention periods applied.

2. Correcting Personal Data

You may request corrections or additions to your Personal Data at any time. If Circular IT group has processed or provided inaccurate Personal Data, we will rectify it immediately and inform you of the correction.

3. Minimizing Processing

If you disagree with the content of the Personal Data stored by Circular IT group, you may request a temporary limitation of processing.

4. Withdrawing Consent

You may withdraw your consent for the processing of your Personal Data at any time. Once your request is received, Circular IT group will cease processing for purposes dependent on your consent. Withdrawal does not affect the lawfulness of prior processing activities.

5. Data Portability

You may request the Personal Data Circular IT group has about you in a structured, commonly used, and machine-readable format. You are free to transfer this information.

6. Right to Erasure ("Right to be Forgotten")

If you no longer wish to use Circular IT group's services, you may request the deletion of all your Personal Data.

7. Objection to Processing

You may object to the processing of your Personal Data when Circular IT group relies on the grounds of "legitimate interest" or "public interest." Circular IT group will reassess its interest versus your privacy rights upon your objection.

8. Filing Complaints

If you are dissatisfied with how Circular IT group handles your Personal Data, you can file a complaint with the **Dutch Data Protection Authority**. Contact details are available on their official website.

9. COOKIES AND SIMILAR APPLICATIONS

Circular IT group uses cookies and similar technologies on its websites. Cookies are small pieces of data stored on your computer. We use them to provide services and ensure proper website functionality. Cookies allow Circular IT group to observe how visitors use the website, enabling us to adjust it to user preferences. Upon your next visit to Circular IT group's website, these small pieces of information will be recognized.

For detailed information, please refer to the cookie policy available on Circular IT group's websites.

10. RETENTION PERIODS

Circular IT group retains Personal Data no longer than necessary for processing purposes. Personal Data is stored for as long as needed to provide services, enable website use, comply with applicable laws, resolve disputes, and fulfill other commercial objectives.

Where applicable, statutory retention periods are strictly followed. Security camera footage is stored for up to four (4) weeks unless an incident necessitates a longer retention period.

11. CONTACT INFORMATION/QUESTIONS/COMPLAINTS/COMMENTS

For questions, comments, or complaints regarding the protection of your Personal Data, please contact us at:

Circular IT group

Radonstraat 300, 2718 TB Zoetermeer, The Netherlands

Phone: 079 762 0200

Email: privacy@circularitgroup.com

Please keep your Personal Data complete, accurate, and up-to-date. Notify us promptly of any changes or errors in your Personal Data.

12. AMENDEMENTS

This Privacy Policy may be updated periodically. The latest version is always available on our website.