

# **Privacy Statement of HVC**

In this Privacy Statement we would like to inform you about what personal data HVC collects and uses and how HVC deals with it.

Where reference is made in this statement to HVC, this refers to all activities undertaken by NV HVC or one of its subsidiaries in the field of sustainable waste management and energy. This Privacy Statement indicates how we handle your personal data for each area.

We recommend that you read this Statement carefully.

This Privacy Statement was last amended on 21 May 2021.

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# 1 How does HVC handle your privacy?

HVC is an organisation active in the field of sustainable waste management and renewable energy. HVC provides sustainable waste management services to municipalities, including the collection of waste from residents. These services are provided by HVC Grondstoffen N.V. HVC is also active in the field of renewable energy. It invests in the construction of solar parks and district heating networks and owns several wind farms.

HVC Energie B.V. supplies renewable energy (heat, electricity and gas) under the names 'HVC KringloopEnergie' and 'HVC Energie'. Through our websites we offer a wide range of information and services. In addition, we process data about you, also known as 'personal data'. In doing so, HVC complies with the applicable laws and regulations, such as the privacy legislation, the Dutch Telecommunications Act (Telecommunicatiewet), the relevant codes of conduct for the supply of energy and the rules on distance selling.

HVC attaches great importance to privacy and therefore handles your personal data with care. That means, for example, that we:

- use this privacy statement to **state the purposes for which** we process your personal data;
- have **security measures** in place to protect your personal data;
- respect your rights, such as the right to **access** and **correct your personal data on request**;

## 2 Use of personal data

If you use our services or visit our websites, you provide us with information. This may include personal data, but also data used by us to analyse the use of our websites, including the number of times that our websites are visited and which pages are viewed. This allows us, for example, to improve the quality of the information displayed and the findability of our websites.

In this Privacy Statement we indicate which personal data we may use. This will not always be all the information below. This depends on which services you use from HVC and which data you leave behind on our websites. We distinguish between the processing of personal data for the collection and processing of waste and the processing of personal data for the supply of renewable energy and related services. For example, HVC has a web shop with products that help to save energy and separate waste at home. In addition, we have a separate website for vacancies with a separate privacy statement. In the Privacy Statement on the website <https://www.werkenbijhvc.nl/voorwaarden-en-disclaimer> you can read how HVC handles your data if you leave your personal data there.

## **2.1 Waste collection and treatment**

For example, we use your postal code and house number to display your personal waste calendar on the website or in the app. We also check your waste pass number for access to a waste disposal station, also known as a household waste recycling centre. Information on how this personal data is processed can be found under '**Processing of personal data by HVC Grondstoffen**'

## **2.2 HVC Energie**

If you purchase or are considering purchasing renewable energy from us, you can enter data on your energy consumption. You can find information on which personal data is processed in the case of renewable energy and why under '**Processing of personal data by HVC Energie**'

## **2.3 Construction and maintenance of district heating networks**

When HVC builds a district heating network in your municipality, you may be contacted by HVC to inform you about the work to be done in your district or street. If, for example, part of a street has to be closed for some time, you will be informed about the work by means of a letter. HVC will use your address details for this purpose. If you are already connected to a district heating network, you may be contacted with information about when maintenance work on the heating network must take place.

## **2.4 Construction and participation in renewable energy projects**

HVC develops and participates in the construction of various renewable energy projects (regional and otherwise), such as solar park Zuyderzon Almere or Windmolen Kralingseveer. For the realisation of a wind or solar park, HVC can cooperate with local energy cooperatives, municipalities or water boards. When HVC carries out such a project in the region, you, as a resident of the municipality or living in the vicinity of such a project, may be approached to inform you about the construction of the project or to invite you to participate in the renewable energy project. The participation takes place through the issue of bonds or depositary receipts for shares. HVC will use your name and address for this purpose. If you choose to participate in a solar or wind farm, HVC will also process your payment details.

Information on how this personal data is processed can be found under '**Processing of personal data by HVC Energie**'

# **3 Processing of personal data by HVC Grondstoffen**

HVC processes personal data during waste collection for its services to various municipalities. The municipality is considered the ‘Data Controller’ for most of the processing of your personal data within the meaning of the privacy legislation. This means that your municipality is responsible for compliance with the privacy rules and that HVC is bound by the agreements with your municipality regarding the handling of your data. HVC is the ‘Data Controller’ for the use of some of your data. For example, for the information you leave when contacting our customer service department, on our websites or the information you share to order products from the web shop. HVC would like to inform you fully about the use of your personal data in the context of waste collection, even if we do this on behalf of your municipality. For this reason, this Privacy Statement provides a complete overview of the use and handling of your personal data.

## **3.1 Contact details HVC Grondstoffen**

Telephone: + 31 (0)800-0700 (free of charge, Monday to Friday 8.00 to 17.00)

Post: HVC Grondstoffen N.V.

Postbus 9199

1800 GD Alkmaar, The Netherlands

## **3.2 Personal data**

The following personal data may be processed during the waste collection by HVC and the services that HVC provides to the municipalities. If you would like to know what agreements have been made with your municipality in particular, please contact our customer service department; see the contact details above.

HVC offers residents of municipalities where a variable waste tax has been introduced the opportunity to monitor their waste disposal behaviour via the HVC app. To do this, an account must be created in the HVC waste app. Further personal data is processed for setting up the account. The processing operations are listed in the terms and conditions of the HVC waste app and in the overview below.

### **3.2.1 Waste collection (both at/from home and at a waste disposal station)**

- address details (postal code, city, without personal names)
- waste pass number or mini-container/waste bin number

- unique identification number (chip code waste pass or mini-container/waste bin)
- number of times the waste bin is emptied and the moment of emptying and/or the number of deposits and moment of deposits in the underground containers (insofar as the municipality has not opted for anonymization of this data).
- Number of times material is dumped near the underground containers
- number of visits to a waste disposal station (in some municipalities)
- waste type
- quantity of waste or weight of waste (only when applying a variable waste tax system or for specific pilots)
- vehicle registration numbers at a HVC location (such as waste disposal stations and weighbridges, which are immediately deleted after leaving the location)
- CCTV footage at HVC locations
- photographs of how waste collection facilities are used / waste collection behaviour
- visitor registration at HVC locations (access control)

### **3.2.2 Contact, information and CRM**

- Name and address details
- RSIN (Legal Entities and Partnerships Identification Number) / BSN (citizen service number) number for the purpose of levying refuse collection charges from suppliers of industrial waste at collection facilities of HVC (by order of a number of municipalities)
- gender
- landline or mobile phone number
- email address
- job/position, organisation and possibly passport photo (in case of use of Extranet by employees of municipalities to which HVC provides services or customers of HVC)
- account number and payment details (if necessary, e.g. when applying for a waste pass)
- contact and address details when requesting collection resources for diapers and /or incontinence material, or specific medical waste (sensitive personal data)
- content of request/complaint/message to HVC
- profile photo of your social media profile if you contact HVC via social media
- content of social media, telephone and chat conversations
- photo of waste collection behaviour(by waste coaches)
- The waste disposal behaviour insofar as collection of this data has been instructed by the municipality
- savings data, or bank details (for gifts/loyalty programme or purchase of products from the web shop)

- technical measurement data of the equipment, such as IP address, MAC address, 'identifiers' and your browsing behaviour on our websites
- your response to emails and other HVC communications
- any customer surveys you have completed
- Rental date and rental agreement number in connection with the declaration of the rent of the trailer/Boedelbak
- WOZ object number (possible for municipalities where a variable waste tax has been introduced)

### **3.2.3 HVC waste app**

- IP address submitting account
- E-mail address
- Family composition
- Type of home (if specified, not mandatory)
- Postal code and house number
- Waste pass number or chip number
- Moment of disposal of residual waste (inspection of waste disposals)

### **3.3 Basis for processing**

For the waste collection, HVC uses your personal data in the performance of its agreement with the municipality, with regard to the provision of services for the municipality, which has the public statutory duty of taking care of the collection of waste (or has it taken care of).

Because the separate collection of diapers and /or incontinence material and the collection of specific medical waste can say something about the health of a person concerned, the processing of these personal data is seen as processing sensitive personal data, for which permission is needed. Also for the use of personal data in the HVC waste app, permission is requested from the users before the account can be created. After the user has agreed to the terms of use, the account is created. If the consent is withdrawn, the account will be blocked and processing by the HVC waste app will be stopped.

### **3.4 Purposes of the processing**

In its services, HVC processes your personal data for various purposes that it and the municipalities set for that purpose, such as:

- waste collection, including collection from named addresses
- achieving environmental objectives and optimising waste policy
- issuing and managing waste passes
- putting out and managing the mini-containers / waste bins
- prevention of waste tourism
- prevention of businesses dumping rubbish at household facilities
- management, control and enforcement of the use of municipal collection facilities, including underground containers and access to and use of household waste recycling centres
- control of compliance with and enforcement of the municipal waste bye-laws
- providing (individual) information on waste products and the environment, for example through a waste coach
- improving the efficiency of waste collection and cost control (such as route optimisation)
- promoting the separate collection of waste and promoting the prevention and recycling of waste
- analysing the waste collection and its effectiveness
- preparing to move to a system of variable waste collection levies
- provide the municipality with information to calculate and collect the variable part of the waste tax
- collecting the refuse collection charges from suppliers of industrial waste, when use is made of HVC's collection facilities

- answering questions, handling reports and complaints relating to waste collection and waste processing at the HVC sites, e.g. a waste disposal station
- communicating and providing information on waste collection and processing (including providing tailor-made advice by the use of the HVC waste app)
- sending newsletters and information about HVC
- the processing of participation in contests, savings, loyalty and other promotions or similar matters
- sending products ordered from the web shop, prizes or saved gifts
- improving the services provided by HVC and, for that purpose, making analyses and reporting on reports, questions and complaints
- website improvement
- providing information to schools or specific interested parties or local residents (e.g. for open days and guided tours at HVC sites or on the construction of installations)
- property management and security of HVC possessions
- compliance with legal obligations and court orders
- litigating disputes

In addition, HVC may use your personal data to carry out the waste collection and processing and its other services as customer-friendly and efficient as possible. For example, the HVC waste app can provide residents who have created an account insight into when they did dispose residual waste.

HVC may also use your personal data for the management and security of HVC's locations. For a more detailed explanation of the use of your personal data for this purpose, we refer you to our '[Privacy Statement on HVC's Access Policy](#)'.

### **3.5 Third parties**

In the execution of its services for your municipality, HVC may exchange your personal data with your municipality. For example, when providing information about waste collection, in the monitoring and enforcement for and by that municipality, or, as is customary in a number of municipalities, when levying and processing refuse collection charges. In addition, HVC can make use of the services of third parties for the aforementioned purposes. For these reasons, your personal data may be provided, for example, to other parties involved in the collection or processing of the waste or in the use of the HVC website (including the web shop). This may include parties such as those creating or maintaining the IT systems and service providers who provide information, services or products for the collection and processing of waste, such as a research agency. These third parties may only process this data for the aforementioned purposes.

Your personal data will not be provided by HVC Grondstoffen to third parties for commercial, good or non-commercial causes. Your data may be stored by third parties outside the EEA (European

Economic Area, consisting of all countries of the European Union, Liechtenstein, Norway and Iceland) when using Google Analytics, SurveyMonkey, Facebook, Twitter, WhatsApp and LinkedIn. These five parties are EU-US Privacy Shield<sup>1</sup> registered, which means that they will abide by the European privacy regulations. We may be required to provide your personal data to third parties if we are required to do so by law. For example, the police can request information from us with a court order in the event of fraud investigations.

HVC's web shop is a collaboration with Eco-Logisch. When you use the web shop of HVC, your personal data that you enter on the web page for your order or for the return of waste points saved by you, will be shared with Eco-Logisch. Eco-Logisch will only use the received personal data to carry out your order, or to answer your questions or comments regarding the use of this web page. The web shop has its own privacy statement in which you can read how Eco-Logisch, as 'co-data controller', deals with your personal data.

## 4 Processing of personal data by HVC Energie

HVC Energie B.V. uses the trade names 'HVC', 'HVC KringloopEnergie' and 'HVC Energie' for the supply of energy and the construction and maintenance of district heating networks. In this Privacy Statement, the name 'HVC Energie' is used. HVC Energie can use your personal data when constructing, maintaining the district heating network, offering and supplying renewable energy (electricity, gas and heat), and when issuing and holding stakes in renewable energy projects. According to the privacy regulations, HVC Energie is the Data Controller for the data processing. This means that HVC Energie is responsible for compliance with these rules. For connections where 'smart meters' are used (meters for which the measurement data can be read remotely), HVC Energie will read the measurement data remotely. In doing so, HVC Energie complies with the agreements made in the Heat Act and Smart Meters Code of Conduct ('Gedragscode Slimme Meters'). This Code of Conduct has been drawn up by the energy suppliers and measurement companies in the Netherlands.

### 4.1 Contact details HVC Energie:

Telephone: + 31 (0)800-0700 (free of charge, Monday to Friday 8.00 to 17.00)  
Post: HVC Energie B.V., also trading as HVC Energie  
Postbus 9199  
1800 GD Alkmaar, The Netherlands

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<sup>1</sup> In a recent judgment of the CJEU, dated July 16, 2020 (Schrems II), the Court assessed the protection offered by the EU-US Privacy Shield as insufficient. It is now up to the European Commission to establish a new regime for the transfer of data from the EU to the US. The Dutch Data Protection Authority is currently reviewing the practical consequences of this ruling within the European Data Protection Board (EDPB). HVC has chosen to await developments in this area.

## 4.2 Personal data

The following personal data can be used by HVC Energie for the construction and maintenance of the district heating network, the provision and supply of renewable energy (electricity, gas and heat) and the issue and holding of stakes in renewable energy projects (solar or wind park):

- Name and address details
- email address
- landline or mobile phone number(s)
- date of birth/age
- job/position and organisation and possibly passport photo (in case of use of Extranet by employees of municipalities to which HVC provides services or customers of HVC)
- user name / login data of 'Mijn KringloopEnergie', web shop or Extranet (for employees of municipalities to which HVC provides services or customers of HVC)
- gender
- payment data (billing address, IBAN, payment method, payment history)
- information that you provide to us yourself (e.g. energy consumption at registration or the data that you enter in an open field on our contact form)
- customer number
- visitor registration and CCTV footage at the HVC locations
- information about your energy contract (type of contract, energy source, duration of the contract, rates, connection address, standard annual consumption, grid operator)
- monthly usage registration for smart meters
- communication preferences for energy supply
- methods of notification or amendment of energy contract
- switching method for energy supply (transfer or not)
- after switching: your previous energy supplier
- commuting job or not
- information about multiple connections to one 'WOZ unit' (unit for the purposes of the Valuation of Immovable Property Act)
- your consent and the data requested if you allow us to request your contract end date and the historical consumption on your connection from the energy registers
- your acceptance of a possible cancellation fine from your previous energy supplier when you switch to HVC
- type of energy meter with number of accumulators on your energy meter
- meter readings and energy consumption data
- energy consumption profile
- your previous energy supplier, if known
- personal details in your self-service environment (Mijn KringloopEnergie)
- contents of requests/complaints/reports to customer service centre

- technical measurement data of the equipment such as IP address, MAC address, ‘identifiers’ in cookies and your browsing behaviour on our websites
- your response to emails and other HVC communications
- any customer surveys you have completed

### **4.3 Basis for processing**

HVC Energie may use your personal data for the performance of your contract for the supply of renewable energy, for the issuance and holding of bonds or depositary receipts for shares in renewable energy projects, or for compliance with legal obligations. In addition, HVC Energie may use your personal data for its legitimate interests, such as:

- the protection of its financial interests,
- the management and security of HVC’s sites,
- the improvement of its services,
- corporate sustainability and contributing to the sustainability of the living environment
- information on the construction and/or maintenance of a district heating network in your area and
- to serve you in the most customer-friendly and efficient way possible.

### **4.4 Purposes of the processing**

HVC Energie processes this data for the following purposes:

- assessing and accepting new customers;
- the formation and performance of the agreement including maintaining contact with you as a customer;
- delivery of the desired energy to the connection(s) indicated by you
- the issuance and holding of bonds or depositary receipts for shares issue and holding of bonds or depositary receipts for shares in renewable energy projects (including the invoicing thereof)
- invoicing of the delivered energy on the basis of the meter readings
- the collection of claims on behalf of third parties, such as the energy tax for the Dutch Tax and Customs Administration (Belastingdienst)
- performing creditor and debtor verification and the collection of receivables and execution of direct debits
- answering questions, disputes and complaints via social media, email, post or telephone
- providing information on the construction, maintenance and malfunctioning of district heating networks and the handling of faults

- corporate sustainability and contributing to the sustainability of the living environment
- marketing activities, such as sending personalised newsletters
- to find out what subjects are relevant to our customers and thus determine how we can develop and/or improve products or services
- measuring customer satisfaction
- sending newsletters, information and announcements of HVC activities (electronic or otherwise) to offer you personalised advertisements and information on the various HVC websites (see also the text under the heading ‘Profiling’)
- property management and security HVC
- providing information to schools or specific interested parties, including local residents (e.g. during the construction of a heating system or guided tours at HVC locations)
- the processing of data in the event of possible participation in contests, savings and other forms of promotions or similar matters and the sending of prizes or saved gifts
- compliance with legal obligations and other regulations, including the Smart Meters Code of Conduct ('Gedragscode Slimme Meters')
- complying with court orders
- litigating disputes (before a complaints committee or judicial body)

## 4.5 Third parties

HVC Energie makes use of the services of third parties for the aforementioned purposes. For example, your personal data may be provided to other parties involved in the supply of energy. These could include network administrators, companies that maintain and develop the IT systems, companies that collect and analyse metering data, payment and collection agencies and service providers that are involved in communicating with current and potential customers, participants in renewable energy projects or customers of the web shop. These third parties may only process your data for the aforementioned purposes. Your personal data will not be provided by HVC Energie to third parties for commercial, good or non-commercial causes. Your data may be stored by third parties outside the EEA (European Economic Area, consisting of all countries of the European Union, Liechtenstein, Norway and Iceland) when using Google Analytics, SurveyMonkey, Facebook, WhatsApp, Twitter, Instagram en LinkedIn. These five parties are EU-US Privacy Shield<sup>2</sup> registered, which means that they will abide by the European privacy regulations. We may also be required to disclose your personal information to third parties if we are required to do so by law. For example, to

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<sup>2</sup> In a recent judgment of the CJEU, dated July 16, 2020 (Schrems II), the Court assessed the protection offered by the EU-US Privacy Shield as insufficient. It is now up to the European Commission to establish a new regime for the transfer of data from the EU to the US. The Dutch Data Protection Authority is currently reviewing the practical consequences of this ruling within the European Data Protection Board (EDPB). HVC has chosen to await developments in this area.

supervisors, such as the Netherlands Authority for Consumers & Markets (ACM), or to the police for a fraud or other form of investigation if the police have a court order to do so.

For the realisation of renewable energy projects, HVC may seek cooperation with third parties, such as local energy cooperatives. In such cooperation a web page (joint or otherwise) developed for that project may be used. When you leave data on such a web page, your data that you provide for information about the project, or for the purpose of enrolment in participation in the project in question is shared with HVC and these third parties. The personal data received will only be used to answer your questions and/or to provide you with further information or to process your request for participation. The web pages are provided with a privacy statement and cookie policy.

HVC's web shop is a collaboration with Eco-Logisch. When you use the web shop of HVC, your personal data that you enter on the web page for your order or for the return of waste points saved by you, will be shared with Eco-Logisch. Eco-Logisch will only use the received personal data to carry out your order, or to answer your questions or comments regarding the use of this web page. The web shop has its own privacy statement in which you can read how Eco-Logisch, as 'co-data controller', deals with your personal data.

## 5 Profiling and cookies

HVC will combine the information we collect about you on websites and from other sources (such as supply agreements) to provide you with the best online experience and service. This data can also be combined with the data that you have left on, or via, one of the following websites of HVC, namely:

- [www.hvcgroep.nl](http://www.hvcgroep.nl)
- [www.aardwarmtemaaasdijk.nl](http://www.aardwarmtemaaasdijk.nl)
- [www.aardwarmtepolanen.nl](http://www.aardwarmtepolanen.nl)
- [www.windkrabbegors.nl](http://www.windkrabbegors.nl)
- [www.werkenbijhvc.nl](http://www.werkenbijhvc.nl)
- [www.triaswestland.nl](http://www.triaswestland.nl)
- [www.zontripkouw.nl](http://www.zontripkouw.nl)
- [www.sunspace.nl](http://www.sunspace.nl)
- [www.zonamstelwijck.nl](http://www.zonamstelwijck.nl)
- [www.zonnoordermeerdijk.nl](http://www.zonnoordermeerdijk.nl)
- [www.windbrielsemaasdijk.nl](http://www.windbrielsemaasdijk.nl)
- [www.etp-westland.nl](http://www.etp-westland.nl)

By combining your data from the websites of HVC, we can show personalised offers and personalised information on the different websites, that match your interests. We can also personalise our newsletter for you in this way. In this way we can make and provide better and more

targeted offers and information. The combined data can also be used for a regional or district-oriented approach to sustainability.

By creating an account in the HVC waste app, HVC can provide the user with tailor-made advice in the field of waste separation and collection.

HVC will only combine the personal data we collect about you in the collection of waste at/from your home and at a waste disposal station with other data if we have permission from you to do so.

We use cookies when collecting and combining your personal data. You can read more about our [Cookie Policy](#) here.

## 6 Retention periods

Your personal data will be kept for as long as it is necessary for the aforementioned purposes. For example, we will keep the data for as long as necessary to provide the service you have requested. It may be the case that your personal data has to be kept for a longer period of time on the basis of the statutory retention obligations, such as the tax retention obligation and the municipality's retention policy for your waste data.

## 7 Security

HVC takes the security of your personal data very seriously. HVC has an appropriate information security policy in place to, among other things, prevent unauthorised persons from gaining access to your personal data. This policy shall be reviewed periodically and adjusted if necessary.

## 8 Your rights

You have the right to request HVC to inspect your personal data, insofar as HVC processes these. After receiving your request, you will receive an overview of your personal data within 1 month at the latest. If this reveals any inaccuracies, you may request that your data be amended, supplemented, deleted or blocked. You can also request HVC to transfer your personal data or you can object to the processing of your personal data due to special personal circumstances.

If your request concerns the processing of your personal data in the context of waste collection, you can also send your request to your municipality. If you submit a request to HVC that relates to the

processing of personal data on behalf of a municipality, HVC will forward your request to your municipality and inform you accordingly.

## 9 Contact

Questions about this Privacy Statement or a request about the processing of your personal data can be sent by post to:

**HVC N.V.**

Stating: Processing of personal data  
Postbus 9199  
1800 GD ALKMAAR, THE NETHERLANDS

You can send requests about the processing of your personal data by email to:

for **HVC Grondstoffen**: [klantenservice@hvcgroep.nl](mailto:klantenservice@hvcgroep.nl)  
for **HVC Energie**: [klantenservice@hvcenergie.nl](mailto:klantenservice@hvcenergie.nl)

In order to prevent abuse of these rights, we ask you, when submitting your request, to identify yourself by sending a copy of a valid proof of identity. Don't forget to make your Citizen Service Number (BSN) and your passport photo unreadable on the copy. For example, you can use the 'KopieID' app for this purpose.

## 10 Complaints about the processing of your personal data

If you have a complaint about the processing of your personal data by HVC, please let us know. If we do not reach a solution together, you have the right to submit a complaint to the privacy supervisor, the Dutch Data Protection Authority (Dutch DPA). You can also apply to the competent court in your region. More information can be found on the website of the Dutch DPA and at www.rechtspraak.nl.

## 11 Changes to the Privacy Statement

HVC may amend this Privacy Statement. New versions are always published on the website. HVC encourages you to periodically review this Privacy Statement to be informed of any changes. Date of last change: 21 May 2021.

## **12 Third-party websites**

This statement does not apply to websites of third parties to which hyperlinks have been placed on our website. We do not know how these websites handle your personal data. We therefore recommend that you consult the privacy statement of that website before using the website in question.