

# Privacy.

That too is future-proof.

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# Read how we deal with privacy, cookies and information security.

## Privacy statement

### 1. General

Boltrics attaches great importance to protecting your privacy. This Privacy Statement describes how Boltrics processes the Personal Data of its Data Subjects. The statement relates to the communication between you, as the Data Subject, and Boltrics, as well as the Products listed herein, in cases where Boltrics can be regarded as the data controller within the meaning of the GDPR. We ask you to read our Privacy Statement carefully, as it explains how and for what purposes we collect Personal Data. By providing Personal Data to us, you consent to the processing and transfer of Personal Data as described in this statement. This statement also describes your choices and rights regarding your Personal Data, including your right of access and rectification. The following definitions apply in this statement:

#### Definitions

- a. Privacy Statement: this Privacy Statement;
- b. Data Subject: any natural person whose personal data are processed by Boltrics when using its applications and website;
- c. Boltrics: Boltrics Professionals B.V.;
- d. Website: de website under [www.boltrics.com](http://www.boltrics.com);
- e. GDPR: General Data Protection Regulation.
- f. Products: References to products in this statement refer to services, Website and other websites, apps, software, servers or devices of Boltrics.
- g. Personal data: Personal data concerns information about an identified or identifiable natural person.

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## 2. Role Boltrics in processing data

Boltrics acts in different ways when processing data:

- (i) Boltrics acts as a controller for your Personal Data when you sign up for our Products, visit our websites or communicate with us through other channels (e.g. personal events). We use this data for a variety of purposes, including to provide our Products to you, to contact you about relevant content, and to improve and promote our Products.
- (ii) Boltrics acts as a processor when we as a service provider deliver our Products to customers and in that context process Personal Data on behalf of customers. In this case, we act as a processor (or service provider) on behalf of our customers under the [Boltrics Data Processing Agreement](#). The customers are responsible for the processing of the Personal Data. The Boltrics Data Processing Agreement is included in the [Terms and Conditions of Delivery of Boltrics](#).
- (iii) Boltrics also acts as a controller when we process Personal Data about individuals in their professional capacity and make this data available to Boltrics Partners for their own sales, marketing and other business activities. This also includes Personal Data that we may collect about you indirectly, such as from publicly available sources, our customers, or other third parties. For more information, please see the section [What personal data do we collect?](#).

If you represent an organization, such as a company, that uses 3PLDynamics and other Boltrics Products as a customer, please refer to the [Customers](#) section of this Privacy Statement to learn how we process your data. If you are an end user of Software and related Boltrics Products, please refer to the section [Software made available by your organization](#).

## 3. Your rights in relation to your Personal Data

For information on how to exercise your privacy rights when Boltrics acts as the controller of Personal Data, please refer to the section [Right to access and control your Personal Data](#). If you wish to exercise your privacy rights in relation to Personal Data that we process on behalf of a customer, please refer to the customer policy in the [Customers](#) section and contact the customer directly.

## 4. Changes

We update this Privacy Statement from time to time and encourage you to review it regularly. We will publish any changes to our Privacy Statement on this page and, if the changes are material, will notify you directly (for example, by sending you an email). Boltrics recommends that you check this page regularly to see if any updates have been made.

## 5. Customers

Products for customers include 3PLDynamics, including all modules or other software (“**Software**”), and the related services. When a customer uses or subscribes to our Software and receives support or professional services for such services, Boltrics receives data from the customer and generates data to deliver the service to the customer (which also includes improving, securing, and updating the service), to carry out our business operations, and to communicate with the customer. The processing of the customer’s Personal Data by Boltrics under the customer agreement with Boltrics for the provision of ICT services is governed by the [Boltrics Data Processing Agreement](#).

Through Boltrics’ Products, you may use or subscribe to other products and services from Boltrics, its suppliers, or third parties. These services may have different privacy practices, and their own privacy statements and policies apply to such services.

The customer is responsible towards Boltrics for the processing of all (personal) data of its employees, (employees of its) customers, contractors, suppliers, or other relations.

## 6. Software made available by your organization

If your organization provides you with access to Boltrics Software, your use of the Software and the associated Products is subject to your organization's policies, where applicable. Privacy-related questions, including requests to exercise your data protection rights, should be directed to your organization's administrator. Boltrics is not responsible for the privacy or security practices of our customers; these may differ from the policies set out in this Privacy Statement.

When you use Software made available by your organization, the processing by Boltrics of your Personal Data in connection with your use of that Product is subject to the terms of a contractual agreement between Boltrics and your organization. Boltrics processes your Personal Data to provide the Software and related services to your organization and you, and in some cases for Boltrics' business activities related to delivering the Product, as described in the section **Customers**. As noted above, if you have any questions about the processing of your Personal Data by Boltrics in connection with the delivery of Software and related Products to your organization, please contact your organization.

## 7. What personal data do we collect?

We collect Personal Data to deliver and improve our Products and to communicate with you. Below is an overview:

- **Contact details:** Name, (email) address, telephone number, social media address, job title, company name.
- **Device details:** IP address, device and browser information, operating system, time zone, and language settings.
- **Location data:** Estimated based on IP address or information you provide (such as city or country).
- **Communication preferences:** Your preferences for receiving emails, newsletters, job vacancies, or other messages.
- **Browsing behavior:** Information obtained via cookies, such as pages visited, click behavior, time spent on pages, and interactions with forms.
- **Email interactions:** Open and click behavior on emails, time of opening, email client or device used.
- **Download behavior:** Data on downloaded content (such as whitepapers, brochures, or job vacancy information).
- **Social media interactions:** Information obtained via remarketing pixels (e.g., LinkedIn Insight Tag, Meta Pixel), such as interactions with advertisements or pages.
- **Form data:** Fields you fill in, such as areas of interest, education level, work experience, CV/cover letter (for job applications).
- **Engagement and profile data:** Scoring or segmentation based on interaction (e.g., lead scoring or candidate engagement).
- **Consent history:** Records of consent given for receiving marketing, use of cookies, and version of the consent.

## 8. How do we collect your data?

Boltrics collects data from you through our interactions with you and through our Products. We collect data in the following ways, among others:

- **Directly from you:** You provide some of this data directly, for example when you enter personal data on our Website, contact us (with a request for information about the Products), or place an order with Boltrics.
- **Through our Products:** Some data is obtained by collecting information about your interactions, use, and experiences with our Products, for example because it is generated through your use of the Product, including via cookies. Usage data includes statistics and information about your use of and interaction with the Product,

such as which product features you use most, when an object (such as a ticket) is opened and closed, and how often certain features are activated. The Boltrics Data Processing Agreement applies and describes how we receive and process personal data when you use Boltrics Software and related Products.

- **Through third parties:** For example, (products from) Microsoft and other (ICT) suppliers or external server providers of Boltrics, such as HubSpot for personalized marketing activities, ICT suppliers for implementing or improving products, our Partners, recruitment agencies for recruitment and selection purposes, etc.
- **Personal Data from various sources:** We may collect Personal Data about you from other sources, such as external suppliers and publicly available sources (such as social media platforms). This can include physical mailing addresses, job titles, email addresses, phone numbers, IP addresses, and social media profiles. This helps us update and improve our products, services, and records, identify new customers, create more personalized advertising, suggest products and services you may be interested in, deliver personalized communications, and promote events.

Which data we collect depends on the context of your interactions with Boltrics and the choices you make, such as your privacy settings and the Products and features you use. For example, Boltrics may collect information from you as described in more detail below:

1. **When you visit our websites.** We collect Personal Data from you when you submit web forms or interact with our websites, for example by registering for a webinar or completing a (contact) form on the Website. We may ask for your email address, first and last name, job title, and other similar business information.
2. **Boltrics events.** When you register for an event, we collect information such as your name, address, phone number, and email address. We use this data to communicate with you and, in some cases, to facilitate your registration. In addition, we may share your registration information with event service providers to provide event-related information and improve your experience at the event or future events. Please refer to the event registration terms for additional information.
3. **Testimonials.** We may post testimonials and comments on our Website, which may contain Personal Data.
4. **Partners.** We may receive information about you, or users of the Software (where applicable), from our global network of partners. We can receive this data in various ways, including through our lead registration processes.

Many of our Products require certain Personal Data in order to provide you with a service. If you choose not to provide the necessary data, you may not be able to use that Product. This also applies to data we are legally required to collect in order to enter into or perform an agreement. We will inform you of this at the time it occurs. If providing the data is optional and you choose not to share it, features that rely on that data may not be available to you.

## 9. Purposes and Legal Grounds for Processing

Boltrics processes the Personal Data of a Data Subject on the basis of a legal ground under the GDPR.

Boltrics processes certain Personal Data in order to pursue its legitimate interests. Boltrics' legitimate interests include, among other things: marketing, research of its own products or services, IT management and security, and sharing with entities affiliated with Boltrics.

Boltrics processes Personal Data primarily for the following purposes, based on the corresponding legal grounds.

<b>Purpose</b>	<b>Legal Ground</b>
<p>The provision of Software and the related Products, including providing updates, or maintaining a supplier relationship, which also includes offering customer service or technical support and processing requests related to the Products. This also includes sharing data when required to deliver the service or to carry out the transactions you request.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Order handling, management and invoicing.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Improvement of the offered Products, including through an analysis of their use, and the development of our Products, as well as the development of our staff and conducting research. We use the information you provide to us, such as professional details, log files, and usage data about how you or your users interact with our Products, to develop and improve our Products and communications. For example, we use usage data to assess product trends and usage in order to help us determine which new features or integrations our users may be interested in.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Personalizing our Products and making recommendations.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Recruitment of staff, processing of applications received through our Website or otherwise, screening of the applicant where necessary.</p>	<p>Legitimate interest</p>
<p>Establishing and maintaining a customer relationship with Data Subject, for example to send informative messages about Products or to respond to questions and requests from Data Subject.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Sending a newsletter from Boltrics.</p>	<p>Legitimate interest Consent</p>
<p>Ensuring security (of IT systems). We use your account information to investigate and help prevent security incidents. We may also use this information to comply with legal requirements. We use your data to verify user accounts and sign-ups for new Products, and to detect and prevent Product misuse. We use log files to provide general statistics about your use of the websites, including how you use our websites, the country from which you log in (for analysis, export control, and regulatory purposes), and to help improve the navigation experience. Your IP addresses are also collected and stored for security and troubleshooting purposes. For these purposes, we link automatically collected data to other personal data you have provided, such as name, email address, address, and telephone number.</p>	<p>Execution of the agreement Legitimate interest</p>
<p>Dispute resolution, legal claim defense, regulatory compliance.</p>	<p>Legal obligation Legitimate interest</p>

<p>Providing targeted advertising based on the Data Subject's interests, using cookies and similar technologies to collect relevant information about the Data Subject. We use Personal Data to advertise, market, and promote our Products and other offerings. For example, we may use data such as your email address or physical address to send you information or Boltrics content that we believe may be of interest to you, for example by post, email, or other means.</p> <p>You can opt out of receiving such promotional content by following the instructions in any communication we send you. If you opt out of our marketing lists, we will continue to contact you regarding administrative matters and to respond to your requests.</p> <p>Where legally required, we will send marketing communications only with your consent. Otherwise, we will market and advertise our Products based on our legitimate business interests.</p>	
<p>Other purposes if we obtain your consent. We may use your data for other purposes if you give us permission to do so.</p>	<p>Consent</p>

## 10. Parties that have access to personal data

In principle, Boltrics will not provide Personal Data to other parties. However, this may occur:

- i. If the Personal Data is provided to processors engaged by Boltrics with whom a data processing agreement has been concluded, or to independent controllers, such as IT, hosting, HR, or other service providers, including external advisors, accountants, or lawyers. This also includes, for example, the supplier of our CRM or marketing software;
- ii. If the Personal Data is provided to a company that is part of the Boltrics group;
- iii. If Boltrics is legally obliged to pass on Personal Data to competent authorities, such as supervisory authorities;
- iv. to respond to legal proceedings;
- v. to ensure the security of our Products;
- vi. to protect the rights and property of Boltrics and its customers;
- vii. If the Personal Data is provided to Partners. We may share your Personal Data with Boltrics Partners in order to: (i) contact you based on your communication preferences; (ii) assist us in performing statistical analyses; (iii) provide sales support; (iv) provide customer support; and (v) improve our partner programs and subscription services. Partners are not permitted to use your Personal Data for purposes other than those stated in this document, and they are required to maintain the confidentiality of your data;
- viii. If the Personal Data is provided to advertising partners. We allow advertising networks to collect data about your interactions with our websites in order to provide personalized advertisements. We may also share personal information, such as your email address, with our advertising partners to display personalized advertisements on other companies' websites or mobile apps. You can opt out of providing your data to our advertising partners via [this form](#).

The provision of Personal Data to the above-mentioned parties will only take place with your consent, or to complete a transaction or deliver a Product you have requested or authorized, or for the purposes mentioned in this Privacy Statement. This will only occur insofar as permitted under this Privacy Statement and applicable laws and regulations, or if Boltrics has a legal obligation to provide Personal Data to a competent authority. Parties to whom Personal Data is provided are themselves responsible for compliance with privacy legislation. Boltrics is neither responsible nor liable for the processing of your Personal Data by these parties.

### Personal Data Outside the EU/EEA

In order to provide the services, Boltrics may need to transfer Personal Data to countries outside the European Economic Area. When this is the case, Boltrics will take appropriate safeguards to lawfully transfer the Personal Data to such countries. The European Commission has, among other things, issued an adequacy decision regarding data flows between the EU and the US. Transfers to countries/processors or processing in countries/by

processors outside the EU/EEA may take place if an adequacy decision applies to the relevant country or to processors participating in the EU-US framework, such as Microsoft Corporation, Redmond, WA.

Boltrics will not transfer Personal Data to any other third country or organization outside the EU/EEA for which there is no adequacy decision from the European Commission, without a lawfully issued written instruction from the Data Subject, binding corporate rules within the meaning of Article 47 GDPR, or appropriate safeguards within the meaning of Article 46 GDPR. This also includes the storage of data.

## Microsoft

An important supplier of our services is Microsoft. Boltrics uses, among other things, Microsoft Dynamics 365 Customer Engagement (CE) for customer relationship management (CRM) and the aforementioned sales and marketing purposes. Your Personal Data, such as first and last name, email address, physical address, telephone number, your computer's address, or other information about you, is, in principle, stored in Microsoft Dynamics 365 on Microsoft's servers within the European Union. If you use Microsoft products via our Products, you are also bound by the terms and privacy statement of Microsoft applicable to the relevant service. For more information, please see the [Microsoft Privacy Statement](#), which may change from time to time.

## HubSpot

We use the HubSpot CRM platform for the aforementioned (personalized) marketing activities. In this context, we may process Personal Data such as first and last name, email address, physical address, telephone number, or other information about you. The information we submit or collect via HubSpot is described under "Customer Data" in HubSpot's [Customer Terms of Service](#).

In general, HubSpot stores and processes information about and on behalf of Boltrics on its servers as a processor (or service provider). Data is stored in the following data hosting location: European Union. This location may change from time to time. For more information on what HubSpot does with stored data, please read HubSpot's [Privacy Statement](#), which may change from time to time.

For more information on how security is arranged at HubSpot, please see: <https://trust.hubspot.com/>.

# 11. Cookies or Similar Technologies

## General

Boltrics uses cookies and similar technologies such as tracking pixels and clear gifs. Cookies are small text files that are placed on your computer, tablet or mobile phone when you visit our Website or other Boltrics Products such as the Web Portal. These cookies store information about your website visit, device and interactions. This allows us to recognize you on your next visit, remember your preferences and optimize our services.

If permission is required, we will ask for it in advance. You can always adjust or withdraw your preferences via the settings at the bottom of each web page.

## Which cookies does Boltrics use?

Boltrics uses first-party and third-party cookies, including both session cookies (which expire when you close the browser) and persistent cookies (which remain on your device for a longer period of time). We distinguish four categories of cookies:

### Functional (necessary – always active)

The technical storage or access is strictly necessary for the legitimate purpose of enabling the use of a specific service expressly requested by the user, or for the sole purpose of carrying out the transmission of a communication over an electronic communications network. These cookies are essential for the functioning of the website and are always placed.

Among other things, they provide:

- Remembering cookie preferences;
- A secure connection (e.g. via HTTPS);
- Basic functionality such as navigation and form submission;

- Proper page loading and session management.  
Examples: WordPress functional cookies, login status.

### Preferences

The technical storage or access is necessary for the legitimate purpose of storing preferences that have not been requested by the user, but contribute to a personalized experience.

These cookies allow us to:

- Remembering language settings;
- Save display and interface preferences;
- Provide consistent ease of use on repeat visits.

These cookies are only placed with the user's consent.

### Statistics

The technical storage or access is used exclusively for statistical purposes to gain insight into the use of our website and the behavior of users.

These cookies help us:

- Analyze the use of the website;
- Monitor page performance and user flows;
- Continuously optimize our services.

We use, among other things:

- **Google Analytics 4 (GA4):** collects anonymized data such as pages visited, session duration and click behavior. We have not given Google permission to use this data for other services. More info: [Google privacy policy](#).
- **Microsoft Clarity:** Records mouse clicks, scrolling behavior, and device information within our Web Portal to visually analyze user interaction. More info: [Microsoft Privacy Statement](#).

These cookies are only placed with your consent. You can opt out via the [Google opt-out tool if you wish](#).

### Marketing

The technical storage or access is necessary to create user profiles for sending relevant advertising or to track the user across a site or across multiple sites for similar marketing purposes.

These cookies are used for:

- Showing personalized advertisements based on browsing behavior;
- Remarketing (e.g. via display networks);
- Measuring the effectiveness of campaigns;
- Personalization of newsletters, apps, and web content.

Boltrics uses for this, among other things:

- Google Remarketing via GA4
- Microsoft Bing Ads
- Microsoft Dynamics 365 CE
- HubSpot Marketing Hub Professional

In addition, cookies can be placed by platforms such as YouTube and Vimeo to show embedded videos. Social media buttons (such as those of Facebook and LinkedIn) can also place cookies via embedded code. These cookies also fall into this category.

You can find more information about the processing of data by these parties in their respective privacy statements, which can change from time to time:

- [Google](#)
- [Microsoft](#)
- [HubSpot](#)

- [YouTube](#)
- [Vimeo](#)
- [Facebook](#)
- [LinkedIn](#)

You can also see advertisements from Boltrics without permission for marketing cookies. Not all of our ads use tracking technologies.

## Deletion and management of cookies

When you first visit our website, you will be given the opportunity to set your preferences via a cookie banner. These preferences are device and browser specific. If you delete cookies or use a different browser, you will need to re-enter your settings.

You can manage and delete cookies through your browser settings. Please refer to the Help function of your browser. For general opt-out of behavioral advertising, please visit: [www.youronlinechoices.com](http://www.youronlinechoices.com) | [Network Advertising Initiative](#).

## Other Tracking Technologies

In addition to cookies, we use other technologies such as **clear gifs** (also known as tracking pixels or web beacons). These are used, for example, in HTML emails to record whether an email has been opened or clicked. This allows us to measure the effectiveness of our communication, monitor technical performance and improve the quality of our services. In certain cases, we link this information to your customer profile.

## 12. Retention period

Boltrics does not retain your Personal Data longer than necessary for the purposes for which the Personal Data concerned was collected or subsequently processed.

Exceptions are legal obligations that require us to retain certain Personal Data for a longer period. We apply a standard retention period of 3 years. This means that we will delete your Personal Data no later than 3 years after your last interaction with us. However, there are situations in which we may or must retain Personal Data for a longer or shorter period, depending on:

1. Legal obligations that require us to retain data for a longer period.
2. The fact that we no longer need the Personal Data for our purposes.
3. The provisions in the Boltrics Data Processing Agreement, if and to the extent applicable.

Boltrics will, after a period of three years since our last interaction with you, contact you via the contact details you have provided. We do this to verify whether your Personal Data is still accurate and whether it is still needed.

## 13. Right of Access to and Control over Your Personal Data

In accordance with this Privacy Statement, you may submit a request to Boltrics to exercise the following rights regarding your Personal Data:

- Right of access to your Personal Data.
- Right to rectify and/or supplement your Personal Data.
- Right to have your Personal Data erased.
- Right to restriction of processing of your Personal Data.
- Right to data portability.
- Right to object.
- Right not to be subject to a decision based solely on automated processing, including profiling.

If you have given your consent to the processing of your Personal Data, you have the right to withdraw that consent at any time.

If you, as a Data Subject, wish to exercise any of these rights, you can contact Boltrics at [marketing@boltrics.nl](mailto:marketing@boltrics.nl). To prevent misuse, we may ask you to adequately identify yourself. When it concerns access to Personal Data linked to a cookie, you must include a copy of the specific cookie. You can find this in your browser settings. Data stored in HubSpot can be requested or deleted [via this form](#).

You can unsubscribe from the newsletter or other commercial communications via the unsubscribe link in emails from Boltrics. Even after unsubscribing from marketing communications (such as via HubSpot), you will still receive essential service messages, such as information about your agreement, invoicing, or other necessary communications. These messages are necessary for our services and are not subject to the opt-out options.

## 14. Complaints Procedure

At Boltrics, we value the quality of our products and the satisfaction of our customers with our services. That is why we regularly conduct customer satisfaction surveys and use the results to further improve our services.

If you believe that certain aspects of our services can be improved, please bring this to the attention of your contact person at Boltrics. We will take all necessary steps to resolve the matter to your satisfaction. If you still believe that the matter has not been resolved, you may use our [complaints procedure](#). For more information on this option, please contact us at [legal@boltrics.com](mailto:legal@boltrics.com).

Data Subjects also have the right to file a complaint with the Dutch Data Protection Authority, which can be done via: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

## General ICT Terms and Conditions

Boltrics uses the Nederland ICT Terms and Conditions. These general terms and conditions apply to all offers and agreements under which we supply goods and/or services of any nature and under any name to you. Download the ICT Terms and Conditions [here](#).

Nothing in this Privacy Statement is intended to create any obligation or agreement between Boltrics and a visitor to the website or other Data Subject. This statement is solely intended to comply with our statutory information obligations under applicable privacy legislation. If there is a contractual relationship (for example with customers), only the general terms and conditions of Boltrics and/or the applicable main agreement shall apply and prevail.

## Language

### English version

This Privacy Statement is a translation of the original Dutch-language document. In the event of any inconsistency or discrepancy between this English version and the Dutch version, the Dutch version shall prevail and be binding.

## Contact

For questions or comments about this Privacy Statement and/or the processing of personal data, please contact Boltrics via:

Boltrics Professionals B.V.  
Galileïlaan 23B  
6716 BP Ede  
Chamber of Commerce number: 081566150000  
VAT number: NL818818074B01  
E-mail: [legal@boltrics.nl](mailto:legal@boltrics.nl)

