



# Privacy Statement – Real Face Value B.V.

Last updated: 23-04-2021

## 1. General information:

Real Face Value B.V. (hereinafter referred to as “Real Face Value”, “we” or “us”) is a company positioned at the intersection of behavioural science, artificial intelligence and aesthetics. We are convinced that optimal natural appearance is key to successful social and professional human interaction. Our company specializes in a method that gives you feedback on the appearance of your face, from an aesthetic, social and professional viewpoint. It does not show your actual character, but it reveals what impressions the people that do not know you form about your character in the first second that they see you. It visualises the invisible (i.e. what people subconsciously think of you). The scientifically based and developed method can be used as an objective framework to aid decision making in considering aesthetic procedures for both the clinician and the client. In addition, our method can be used to visualize the potential results of a desired aesthetic treatment, by handling images such that the client depicted on the image can form an idea and expectation of specific aesthetic treatment outcomes. All in all, at Real Face Value we make sure that you can be at your best when it is needed most.

On the 25th of May 2018, the EU General Data Protection Regulation (GDPR) was enforced. The goal of this regulation is to protect the privacy of individuals with new standards regarding personal data processing. In short, this is about any kind of use of personal data about individuals.

## 2. Privacy matters to us

We at the Real Face Value are committed to ensure the privacy of all parties involved with our organisation. As our headquarters is located in the Netherlands, European legislation applies to our organisation. This Privacy Statement aims to give you an explanation of the GDPR and your rights as an individual under this regulation. It also describes how we use and process the personal data we obtain from you when you apply for a job at Real Face Value or when you work with us as a business partner. Analytic and functional cookies are placed on our website. When you visit our website, we process information that is or may be identifiable to you. For more information, we kindly refer to our cookie policy which you can find on our website (<https://www.realfacevalue.eu/>). We may update this Privacy Statement from time to time. We encourage you periodically to review this page for the latest information on our privacy practices.

## 3. When and how do we collect personal data about you?

We may process personal data from our employees, job applicants, our business partners, our customers and/or users.

We may collect information about you:

- directly from you, such as the information you provided to us when you are an employee of one of our business partners;
- from other sources, such as your (former) employer or via our agents; and
- from publicly available sources such as LinkedIn or the corporate website of the organisation you are working for;
- when you visit our website.

#### 4. Which personal data do we process, for what purposes and on what legal basis?

According to the GDPR personal data is considered to be any information that relates to an identified or identifiable individual.

- B2B Customers:

If you are our (potential) customer, we may have your contact details e.g. name, business address and phone number and e-mail address, the contact person at your organisation, their and your position and may have your bank account and VAT number.

We will process the personal data from our customers for purposes of selling and delivering our products. The legal basis for such processing personal data is the performance of a contract. For contractual reasons, we also need personal data to provide our services and comply with the obligations arising from contractual agreements concluded with you. This data is used e.g. for performing a contract, managing customer data, handling payments and providing you with information about our product and prices.

We will also use your personal data for sending you our price list via e-mail. The legal basis for such processing personal data is the performance of a contract or our legitimate interest. Our legitimate interest translates into our objective to communicate relevant news regarding our products.

- Business partners:

If you are (working for) one of our business partners, we may have your contact details e.g. name, business address and phone number and e-mail address, the contact person at your organisation, their and your position and may have your bank account and VAT number.

We will process personal data from our business partners for purposes of importing, exporting and distributing our products. The legal basis for such processing personal data is the performance of a contract. For contractual reasons, we also need personal data to provide our services and comply with the obligations arising from contractual agreements concluded with you. This data is used e.g. for performing a contract, managing customer data, handling payments and providing you with information our product and prices.

We will also use your personal data for sending you our price list via e-mail. The legal basis for such processing personal data is the performance of a contract or our legitimate interest. Our legitimate interest translates into our objective to communicate relevant news regarding our products.

- Employees:

Employees are notified of the personal data that we may process about them via their employment contract and internal information channels.

The legal basis for processing is performance of a contract, consent or our legitimate interest.

- Visitors of our website:

Analytic and functional cookies are placed on our website. For more information, we kindly refer to our cookie policy which you can find on our website (<https://www.realfacevalue.eu/>).



- Users of our application:

If you are using our application, you are asked to provide us with your name, gender, age and email address in order for you to make use of the complete functionality of our application. For some advance functionality you have to provide further personal data and contact details for us for contractual reasons providing our services, handling payments and providing you with relevant information about our products and prizes.

If you are using our application (i) to receive feedback on the appearance of your face, from an aesthetic, social and professional viewpoint, or (ii) to visualize the potential results of a desired aesthetic treatment, you are required to upload one or multiple images of yourself. This can only be an image of yourself or someone that has given explicit consent to you to use their image for the purpose of using it in our application. We ask your explicit consent for using, processing and storing the original image as well as the handled image as a result of our processing in order to provide our service with full functionality to you at the time of use and in the future. This includes providing the best service we can offer you at the time using as well as improving our service in the future.

## 5. How long do we store your personal data?

We only hold your personal information on our systems for as long as is necessary for the purposes outlined above. We remove personal data from our systems once it is no longer required, in line with our guidelines on how long important information must remain accessible for future use or reference, as well as when and how data can be destroyed when it is no longer needed.

The length of time each category of data will be retained will vary depending on how long we need to process it for, the reason it was collected and in line with any statutory requirements. After this time the data will either be deleted or we may retain a secure anonymised record for research and analytical purposes.

We will store your personal data as listed below or until the moment you have informed us that you would like us to delete your personal data, no longer wish to receive our mailings, we cease the sending of the relevant mailings, or it appears that your email address is no longer in use (for example when we receive a failed delivery notification). Information relating to one-time events will be deleted when the particular event has taken place and we no longer need that information.

<b>Personal data concerning:</b>	<b>Retention period</b>
B2B Customers	For as long as the customer relationship continues, to a minimum of 7 years after the ending thereof
Business partners	For as long as the business relationship continues, to a minimum of 7 years after the ending thereof
Employees	For as long as their employment, to a minimum of 7 years after the ending thereof
Visitors of our website	Functional cookies: not stored Analytical cookies: 6 months from set up date
Users of our application	For as long as you have an active personal profile in the application



## 6. Transfer/disclosure of personal data

In the context of the purposes as listed above, we may share your personal data with third parties, such as cloud services providers, software providers, payroll administration office, printers and/or event organizers.

### Processing arrangements

Where we use third party service providers we will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

As a general rule, we only share your personal data as set out above with other parties located in countries outside the European Economic Area, if this is absolutely necessary for the performance of a contract or given our legitimate interest. In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your personal data in accordance with applicable data protection legislation. Generally, we will enter into the Standard Contractual Clauses (as approved by the European Commission) with the recipient of your personal data. You may contact us via [info@realfacevalue.eu](mailto:info@realfacevalue.eu) if you wish insight in adequate measures taken.

## 7. Protection of personal data

Real Face Value will take all measures in its power that are necessary from technical and organisational point of view to prevent unauthorised access to personal data, loss, destruction, falsification and leakage of personal data. We shall select service providers, which handle personal data in an appropriate manner, and will supervise service providers as necessary and appropriate to ensure the security control of the Personal data.

## 8. Your rights regarding the processing of personal data

You have many rights regarding your personal data. Read more about them below. If you would like to exercise them or learn more, feel free to contact us. You can find contact detail at the end of this statement. Please note that some of the rights may not be applicable to your situation.

- Right of access  
You have the right to know what personal data we process and why. That's why we inform you in advance about our processing activities via this Privacy Statement. If you have any questions, or would you like to learn more about what information we process from you, you are always welcome to contact us and we will provide you with further information.
- Right to rectification  
If you believe we store wrong information about you, such as your name or address, you can ask us to correct this.
- Right to erasure / right to be forgotten  
You have the right to tell us to permanently erase your personal data from our records. You can do this for example if you believe there's no longer any need for us to keep it. Or, if you previously have given your permission, you can just decide to withdraw it.



- **Right to restrict the processing activities**  
You have the right to restrict our processing activities in certain situations. This means we will continue to store your information, but we will temporarily stop any other processing. Why would you want to do this? For example, if you have asked us to fix incorrect information. In this situation you may want us to stop processing until the information is correct.
- **Right to data portability**  
In certain situations, you have the right to ask us to send your personal data in digital form to you, so that you can forward it to someone else.
- **Right to object**  
You have the right to object to the processing of your information, even when we have a legitimate legal reason to process it. You can do this when we process your information on the basis of our legitimate interest, and you believe that your personal interest outweighs ours. If you do not want us using your information for direct marketing purposes, including profiling, we will comply upon request.
- **Right to withdraw consent**  
If we process your personal data based on your consent, you have the right to withdraw your consent anytime.

To exercise your rights, please contact us via the contact details listed below.

Finally, if you are not satisfied with the way we treat your personal data, you have the right to lodge a complaint with the Dutch Data Protection Authority via the website.

## **9. Contact details**

If you have questions about our privacy statement or practices or wish to exercise your rights, please feel free to get in touch. You can contact us at:

Real Face Value B.V.  
Honingerdijk 34  
3062 NW Rotterdam  
the Netherlands  
Mail address: [info@realfacevalue.eu](mailto:info@realfacevalue.eu)