



Privacy statement

Declaer B.V.

Version 2026.1

Effective from 20 August 2026

Product compliance as it should be.

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Declaer helps manufacturers, importers and distributors bring their products into conformity with European product legislation. In doing so we process personal data. This statement explains which data that is, why we process it, with whom we share it, how long we keep it and what rights you have.

Translation This document is a translation of the Dutch original. In the event of any difference in meaning between the two language versions, the Dutch version prevails. The Dutch version is available on declaer.com.

1 | Who is responsible for your data

The controller for the processing described in this statement is:

- Declaer B.V., Foxtrot 1, 1704 EH Heerhugowaard, the Netherlands
- Registered with the Dutch Chamber of Commerce under number 93429010
- info@declaer.com · +31 (0)85 902 4226

Declaer has not appointed a data protection officer, because there is no statutory obligation to do so. You can raise any privacy question with us at info@declaer.com.

Processor or controller? In our advisory and assessment work we determine ourselves which data we need and how we record it. We are the independent controller for that processing. Where we process personal data solely on your instructions, for example when managing a file or a registration on your behalf, we conclude a data processing agreement with you.

2 | Whose personal data we process

- Contact persons at clients and at organisations requesting a quotation
- Contact persons at suppliers, test laboratories, notified bodies and other parties we involve in an assignment
- People named in the files we work on, for example the signatory of a declaration of conformity or the contact person at a manufacturer outside the European Union
- Visitors to declaer.com and recipients of our e-mail messages
- Job applicants

3 | Which personal data we process

Category	Data
Contact and company details	Name, job title, business e-mail address, business telephone number, company name, business address, Chamber of Commerce and VAT numbers
Communication	E-mail messages, letters, chat and telephone notes, records of meetings and consultations, and the attachments to them
File data	Names, job titles and signatures appearing in declarations of conformity, technical documentation, test reports, mandates and correspondence with authorities
Financial data	Invoicing details, bank account number, payment history and, where necessary, creditworthiness information
Website data	IP address, device and browser details, pages visited, time of the visit and data from forms you complete
Application data	Curriculum vitae, motivation, education and employment history, and the correspondence about your application

We do not ask for special categories of personal data, such as data on health, religion or political opinions, and we do not need them for our services. If you send us such data unsolicited, we delete it.

4 | Why we process your data and on what legal basis

Purpose	Legal basis (GDPR)
Issuing a quotation and answering your questions	Performance of the contract or steps preceding it, Article 6(1)(b)
Carrying out the assignment, including assessments, GAP analyses, technical files, registrations and acting as authorised representative	Performance of the contract, Article 6(1)(b)
Keeping our administration, invoicing and accounts receivable	Performance of the contract and legal obligation, Article 6(1)(b) and (c)

Purpose	Legal basis (GDPR)
Complying with statutory obligations, including the tax retention obligation and the obligation of the authorised representative to keep documentation at the disposal of market surveillance authorities	Legal obligation, Article 6(1)(c)
Relationship management, client satisfaction and sending information about our services to existing clients	Legitimate interest in maintaining our client relationship, Article 6(1)(f)
Sending our newsletter to people who are not clients	Consent, Article 6(1)(a)
Securing our systems, preventing misuse and making back-ups	Legitimate interest in secure operations, Article 6(1)(f)
Measuring and improving the use of our website	Consent for non-essential cookies, Article 6(1)(a)
Handling a job application	Legitimate interest in filling a vacancy and, for retention after rejection, consent, Article 6(1)(f) and (a)
Establishing, exercising or defending a legal claim	Legitimate interest in legal protection, Article 6(1)(f)

5 | Where we obtain your data

In most cases we receive your data from you, or from the organisation you work for. In addition, we may receive or request data from:

- the commercial register of the Dutch Chamber of Commerce and comparable foreign registers
- public sources such as your company website and public business profiles
- public European databases and registers, such as EPREL, Safety Gate and the database of notified bodies
- documents your suppliers or customers send us in the context of an assignment

6 | With whom we share your data

We do not sell your data. We share data only where this is necessary for the purposes set out above, with the following categories of recipients:

- parties we involve in an assignment, such as test laboratories, notified bodies, translators and specialist advisers
- market surveillance authorities and other competent authorities, where we are legally obliged to do so or where this is necessary for the assignment

- suppliers of IT and cloud services supporting our e-mail, document storage, client administration and website, including Microsoft and HubSpot
- our accountant, bookkeeper, insurer, legal advisers and, in the event of overdue payment, a collection agency or bailiff
- banks and payment service providers

We conclude a data processing agreement with parties that process data solely on our behalf. We impose a duty of confidentiality on parties we involve in an assignment.

7 | Transfers outside the European Economic Area

Our services are international. As a result, your data may be processed outside the European Economic Area, for example when we communicate with a manufacturer in Asia on your behalf, or when an IT supplier provides support from a third country.

We only transfer data outside the European Economic Area where there is a valid basis for doing so:

- an adequacy decision of the European Commission for the country or framework concerned
- the standard contractual clauses of the European Commission, supplemented where necessary with additional technical and organisational measures
- the necessity of the transfer for the performance of the contract with you

On request we will inform you of the safeguards that apply to a specific transfer.

8 | How long we keep your data

Data	Retention period
Contact and relationship details of clients	For the duration of the client relationship and two years thereafter
Details of prospects and quotation requests that do not lead to an assignment	Two years after the last contact
Assignment files, reports and correspondence about an assignment	Seven years after completion of the assignment
Files in which we act as authorised representative	Ten years after the last product was placed on the market, in accordance with the applicable European product legislation
Invoices and other data from our administration	Seven years, on the basis of the tax retention obligation
Application data	Four weeks after the procedure has ended, or one year with your consent

Data	Retention period
Data on the use of our website	26 months at most
Data needed in connection with a dispute or legal claim	Until the dispute has been definitively settled

Once the retention period has expired we delete your data or render it untraceable, unless we are required by law to keep it longer.

9 | How we secure your data

We take appropriate technical and organisational measures to protect your data against loss and against unlawful processing. These include at least:

- encrypted connections and encrypted storage of documents
- multi-factor authentication on our accounts and a password policy
- access to files only for employees who need it for their work
- confidentiality arrangements with employees and with the parties we engage
- regular back-ups and a procedure for reporting data breaches

If you suspect a weakness in our security or a data breach, we ask you to report it to info@declaer.com so that we can investigate and resolve it.

10 | Automated decision-making

We do not take decisions with legal consequences for you based solely on automated processing, and we do not build profiles to predict your behaviour. Where we use digital tools in an assessment, an employee always reviews and approves the outcome.

11 | Your rights

You have the following rights in respect of your personal data:

- access to the data we process about you
- rectification of inaccurate or incomplete data
- erasure of your data, to the extent that we are not required to keep it
- restriction of the processing
- objection to processing based on a legitimate interest, and to the use of your data for direct marketing
- portability of the data you provided to us yourself

- withdrawal of consent given earlier, without this affecting processing that took place before the withdrawal

You can submit a request to info@declaer.com. We respond within one month of receipt. If your request is complex we may extend that period by two months, in which case we will tell you within one month. To prevent us from disclosing data to the wrong person, we may ask you to prove your identity.

12 | Cookies and our website

We use cookies and similar techniques on declaer.com. Essential cookies make sure the website works and is secure; we always place those. We place analytical and marketing cookies only after you have given consent. You can change your choice at any time through the cookie settings on the website, and you can delete cookies through your browser.

Our website may contain links to and embedded content from other parties. Their own privacy policy applies to their use of your data.

13 | Questions or a complaint

If you have a question, or if you are not satisfied with the way we handle your data, please contact us first at info@declaer.com or +31 (0)85 902 4226. We are happy to resolve it with you.

You also always have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), PO Box 93374, 2509 AJ The Hague, the Netherlands, autoriteitpersoonsgegevens.nl. If you live or work in another Member State of the European Union, you may also lodge a complaint with the supervisory authority there.

14 | Changes to this statement

We amend this privacy statement when our services, our systems or the applicable rules give cause to do so. The current version is always available on declaer.com. If anything material changes in the way we use your data, we will let you know.

How this relates to our terms This privacy statement forms part of the General terms and conditions Declaer B.V. version 2026.1. Article 16 of those terms governs the allocation of roles and responsibilities for the processing of personal data between Declaer and the client.

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