

Total Webhosting Solutions B.V. | Personal data exchange policy

January 2021

This policy on the exchange of personal data has been drawn up by Total Webhosting Solutions B.V. (Total Webhosting Solutions), whereas Total Webhosting Solutions exchanges personal data with its Business Units (BUs). Both Total Webhosting Solutions and every individual BU can be considered a controller within the meaning of Article 4(7) of the GDPR. Within the framework of the careful handling of personal data, Total Webhosting Solutions has laid down a number of arrangements regarding the exchange of personal data with its BUs in this policy.

1. The personal data exchanged will be handled in accordance with the applicable laws and regulations on the protection of personal data. Every individual BU is independently responsible for compliance with the applicable laws and regulations.
2. The personal data exchanged will only be used for the purpose for which these were exchanged.
3. The personal data exchanged will only be made available internally to those employees who require these personal data in the discharge of their duties.
4. The personal data exchanged will be treated confidentially.
5. Total Webhosting Solutions and the BUs are each independently responsible for the security of the personal data that fall under their responsibility.
6. Total Webhosting Solutions and the BUs will independently inform data subjects of the purposes for which personal data are processed in their own privacy statement and will refrain from processing the personal data for any purpose other than the purpose for which they themselves have a legitimate basis.
7. Total Webhosting Solutions and the BUs are and will remain independently responsible for reporting a personal data-related breach (data breach) within the meaning of Article 4(12) of the GDPR to the Dutch Data Protection Authority and/or data subjects. If the data breach pertains to a situation in which Total Webhosting Solutions can be considered to be a joint controller, the parties will consult as soon as possible to determine how the data breach can be dealt with as carefully and adequately as possible.
8. In the event that a data subject sends a request to exercise their rights – such as the right of inspection, deletion, rectification or objection, or any of the other rights referred to in the GDPR – to a BU, the BU will handle the request independently if the request relates to processing with regard to which the relevant BU is an independent controller.
9. If the request (as described under 8) pertains to processing with regard to which the BU and Total Webhosting Solutions are both considered controllers, the parties will consult as soon as possible to determine who will handle the request. The data subject who submitted the request may be informed of this.
10. Where necessary, the BU will provide any information and assistance that may be required to enable Total Webhosting Solutions to handle the request (as described under 9). Total Webhosting Solutions will have the same obligation towards the BU.



11. If the data subject sends their request to a BU and the request pertains to another BU, or to Total Webhosting Solutions, the BU will ensure that the request is sent to the correct BU or to Total Webhosting Solutions. Total Webhosting Solutions will have the same obligation towards the BUs.