

PRIVACY STATEMENT

BENK Activation — benkactivation.com

Version 1.0 — last updated 2026

Buro Benk B.V., trading as BENK Activation (“BENK”, “we”, “us”, “our”), respects your privacy and handles your personal data with care. This privacy statement explains what personal data we collect, why we collect it, how we use it, how long we keep it, who we share it with, and what rights you have. It applies to the website benkactivation.com and to all services we provide.

We process personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Dutch GDPR Implementation Act (Uitvoeringswet AVG).

1. Who we are

BENK is the controller for the processing of personal data described in this statement, unless section 4 states otherwise.

Legal entity	Buro Benk B.V., trading as BENK Activation
Chamber of Commerce (KvK)	30188859
VAT number	[VAT NUMBER]
Postal address	P.O. Box 13061, 3507 LB Utrecht, The Netherlands
Website	www.benkactivation.com
E-mail	info@benkactivation.com
Telephone	+31 (0)6 21203761
Privacy contact	Nout Besteman — info@benkactivation.com

We have not appointed a statutory Data Protection Officer, as we are not required to do so. Nout Besteman is our internal contact point for all privacy matters and can be reached at the details above.

2. Whose personal data we process

Depending on how you interact with us, you may fall into one or more of the following groups:

- Website visitors — people who visit benkactivation.com or other websites we operate.
- Business contacts — contact persons at our clients, prospective clients, suppliers and partners.
- Newsletter subscribers and people who contact us — through our contact form, by e-mail, by telephone or via social media.
- Campaign participants — consumers who take part in a promotion, prize draw, sampling action, sweepstake, loyalty programme, event or other activation that we run for or with a brand.
- Job applicants and freelancers — people who apply for a position or offer their services to us.

3. Personal data we process

We only collect personal data that we actually need. What we process depends on the group you belong to.

3.1 Website visitors

- IP address (shortened where possible), device type, browser type and version, operating system and language settings.
- Pages viewed, time and duration of your visit, and the website you arrived from.
- Cookie identifiers and similar identifiers — our full cookie statement is section 8.

3.2 Business contacts

- Name, job title and the organisation you work for.
- Business contact details: e-mail address, telephone number, postal address.
- Correspondence and meeting notes, contract and project details.
- Invoicing and payment details (bank account number, invoice references).

3.3 Newsletter subscribers and people who contact us

- First and last name, e-mail address and, if you provide it, telephone number and organisation.
- The content of your message or request.
- Subscription status, and — for our newsletter — whether an e-mail was opened or a link was clicked.

3.4 Campaign participants

For promotions, prize draws and other activations we typically process:

- First and last name.
- E-mail address, and where relevant a telephone number or social media account name — so that we can reach you if you win.
- Postal address — only when we need to send you a prize or product.
- Date of birth or an age confirmation, where the campaign has a minimum age (for example alcohol-related campaigns).
- Proof of purchase, receipt or unique code, where the campaign requires one.
- Photos, videos, text or other content you submit, and your consent for its use, where the campaign invites you to submit content.
- Answers to questions or preferences you give us voluntarily.

Each campaign has its own terms and conditions, which state exactly what data is collected for that campaign and who the brand owner is.

3.5 Job applicants and freelancers

- Name and contact details, CV, motivation letter, portfolio, references and interview notes.
- Publicly available professional profiles (for example LinkedIn).

4. Our role: controller and processor

BENK works for brand owners. That means our role differs depending on the situation:

- **As controller:** for our own website, our newsletter, our own marketing and sales activities, our client and supplier administration, and our recruitment. In these cases we determine why and how personal data is processed, and this privacy statement applies in full.
- **As processor:** when we develop and run a campaign on behalf of a client and that client determines the purpose and means of the processing. In that case the client is the controller and its own privacy statement applies to the participant data. We process the data only on the client's documented instructions and under a data processing agreement.

The campaign terms and conditions or the registration form will always tell you which organisation is the controller for that specific campaign.

5. Why we process your data, and on what legal basis

We only process personal data where we have a legal basis under Article 6 GDPR. The table below sets out our main purposes.

Purpose	Legal basis
Operating, securing and improving our website and analysing how it is used	Legitimate interest (running a secure, effective website) and, for non-essential cookies, your consent
Answering your questions, requests and other correspondence	Performance of a contract, or our legitimate interest in responding to enquiries
Sending our newsletter and other commercial communications	Your consent, or legitimate interest where you are an existing client (see section 14)
Running campaigns, promotions, prize draws and events, including selecting and notifying winners and delivering prizes	Performance of a contract (the campaign terms), your consent, or our client's legal basis where we act as processor
Verifying eligibility for a campaign (for example age or proof of purchase) and preventing fraud and abuse	Legitimate interest and, where applicable, a legal obligation
Entering into and performing agreements with clients, suppliers and partners; project delivery; invoicing and administration	Performance of a contract and legal obligation
Business development and relationship management with business contacts	Legitimate interest (promoting our services to relevant professional contacts)
Recruitment and selection of employees and freelancers	Steps taken at your request prior to entering into a contract, and your consent for keeping your details on file
Complying with legal obligations, such as tax and accounting retention rules and gaming-code obligations	Legal obligation
Establishing, exercising or defending legal claims	Legitimate interest

Where we rely on a legitimate interest, we always weigh that interest against your privacy. You can object to such processing at any time — see section 13.

6. Where we get your data

Most of the personal data we hold you have given to us yourself — for example by filling in a form, subscribing to our newsletter, entering a campaign, or contacting us. In addition we may receive personal data:

- From our clients and their agencies, where we run a campaign or project on their behalf.
- From partners who carry out part of a campaign, such as fulfilment houses, field-marketing agencies, retailers or media partners.
- From publicly available sources, such as company websites, professional networks like LinkedIn, trade press and the Chamber of Commerce register — for business contacts only.
- Automatically, through cookies and similar technologies when you visit our website.

7. Children and special categories of data

Our website and services are not intended for children under the age of 16. We do not knowingly collect personal data from children under 16 without the consent of a parent or guardian. Because we cannot always verify a visitor's age, we encourage parents and guardians to be involved in their children's online activities. If you believe we have collected personal data about a child without the required consent, please contact us at info@benkactivation.com and we will delete that information.

Where a campaign is aimed at or open to minors, we state this in the campaign terms and, where required, we ask for verifiable parental consent.

We do not seek to process special categories of personal data (such as data revealing health, religion, ethnic origin or political opinions) and we ask you not to share such data with us unless we specifically request it.

8. Cookies and similar technologies

This section is our cookie statement. It explains what cookies are, which cookies we place on benkactivation.com, why we place them, how long they last and how you can change your choice at any time.

8.1 What is a cookie?

A cookie is a small text file that a website stores on your computer, tablet or smartphone when you visit it. Cookies let a website remember your actions and preferences, recognise your device on a return visit, and measure how the site is used. We also use comparable techniques that do not rely on cookie files, such as pixels, tracking pixels and local storage in your browser. Wherever this statement refers to cookies, those techniques are included.

Cookies can be **first-party** (placed by us) or **third-party** (placed by another organisation whose service is embedded in our site). They can be **session cookies**, which are deleted when you close your browser, or **persistent cookies**, which remain on your device until they expire or you delete them.

8.2 Your consent

When you visit benkactivation.com for the first time, you are shown a cookie banner. Strictly necessary and functional cookies are placed straight away, because the website cannot work without them and the law does not require consent for them. All other cookies — analytical, marketing and tracking — are placed only after you have given your consent.

Refusing is as easy as accepting: the banner offers a “reject” option at the same level as “accept”. Until you make a choice, no non-essential cookies are placed, and we do not interpret scrolling, clicking or continued use of the site as consent. Access to the website is not conditional on accepting cookies.

You can withdraw or change your consent at any time — see section 8.7. Withdrawing consent does not affect the lawfulness of what was placed before you withdrew it.

8.3 Strictly necessary and functional cookies

These cookies are required for the website to work and to remember your settings, including your cookie choice. They cannot be switched off. No consent is required for them.

Cookie	Provider	Purpose	Retention
[SESSION COOKIE NAME]	BENK Activation (first party)	Keeps your session active while you browse the site	Session
[CONSENT COOKIE NAME]	[CONSENT TOOL]	Stores your cookie preferences so the banner is not shown again	[6 or 12 months]
[CSRF / SECURITY COOKIE]	BENK Activation (first party)	Protects forms against misuse and secures the connection	Session

Your web developer must confirm the exact names and retention periods of these cookies before publication.

8.4 Analytical cookies

We use Google Analytics 4 to understand how visitors find and use our website, so that we can improve it. These cookies are placed only with your consent. We have concluded a data processing agreement with Google, we do not use the data for advertising purposes through this tool, and we do not combine it with other data sets.

Cookie	Provider	Purpose	Retention
_ga	Google (third party)	Distinguishes unique visitors by assigning a randomly generated identifier	2 years
ga[MEASUREMENT ID]	Google (third party)	Keeps the session state for Google Analytics 4	2 years
_gid	Google (third party)	Distinguishes visitors within a 24-hour period	24 hours
_gat / _dc_gtm_[ID]	Google (third party)	Limits the number of requests sent to Google Analytics	1 minute

8.5 Marketing and tracking cookies

These cookies allow us and our advertising partners to measure the effect of our campaigns, to show you relevant advertising on other platforms and to build audiences of people who have visited our site. They also allow those partners to build a profile of your interests across websites. They are placed only with your consent.

Cookie	Provider	Purpose	Retention
_fbp	Meta (third party)	Identifies browsers for advertising and conversion measurement	3 months
_fbclid	Meta (third party)	Stores the click identifier when you arrive from a Meta advertisement	3 months
fr	Meta (third party)	Delivers, measures and improves the relevance of advertising	3 months
bcookie / bscookie	LinkedIn (third party)	Browser identifier used for advertising and platform security	1 year
lidc	LinkedIn (third party)	Routes your requests to the right LinkedIn data centre	24 hours
UserMatchHistory	LinkedIn (third party)	Synchronises the LinkedIn advertising identifier	30 days
AnalyticsSyncHistory	LinkedIn (third party)	Records when synchronisation with LinkedIn analytics took place	30 days
li_gc	LinkedIn (third party)	Stores consent for the use of non-essential cookies	6 months
li_sugr	LinkedIn (third party)	Makes a probabilistic match of your identity for advertising	90 days

Retention periods for third-party cookies are set by the provider and may change without notice. The values above reflect the situation at the date of this statement.

8.6 Third parties and international transfers

Google, Meta and LinkedIn are established outside the European Economic Area and act as independent controllers for the data they collect through these cookies. Their own privacy and cookie policies apply to that processing, and we have no control over what they do with the data. Transfers to the United States take place under the EU-US Data Privacy Framework or under the European Commission's Standard Contractual Clauses. We encourage you to read their policies before giving consent.

8.7 Changing or withdrawing your choice

You can change or withdraw your cookie preferences at any time via the cookie settings link in the footer of every page on benkactivation.com.

You can also manage cookies directly in your browser: refuse all or certain cookies, delete cookies that have already been placed, and set your browser to warn you before a cookie is stored. The way to do this differs per browser and can be found in its help function. Deleting cookies in your browser also deletes the cookie that records your preferences, so the banner will appear again on your next visit.

Please note that refusing functional cookies may mean that parts of the website no longer work properly.

8.8 Changes to this cookie statement

The cookies we use may change as our website develops. We review this cookie statement at least once a year and whenever we add or remove a tool, and we publish the updated version on benkactivation.com. The date of the most recent update is shown on the first page.

9. Automated decision-making and profiling

We do not take decisions based solely on automated processing that produce legal effects for you or similarly significantly affect you.

We do use automated tools to analyse website traffic and to measure campaign performance, and we may segment our newsletter list so that we send you more relevant content. This does not affect your legal position, and you can object to it at any time.

Winners of prize draws are selected at random. Where a draw is run electronically, we can explain the method used on request.

10. Sharing your data with others

We do not sell your personal data. We only share personal data where this is necessary for the purposes described above, or where we are legally required to do so. We may share data with:

- Our clients — the brand owner for whom a campaign is run, where this is set out in the campaign terms.
- Service providers acting on our instructions, such as hosting and IT providers, website and application developers, e-mail and newsletter platforms, CRM systems, analytics providers, fulfilment and logistics partners, printers, and field-marketing partners.
- Professional advisers, such as our accountant and, where necessary, legal advisers.
- Public authorities, where we are required to disclose data by law.

With every party that processes personal data on our behalf we conclude a data processing agreement to ensure an equivalent level of security and confidentiality. BENK remains responsible for these processing activities.

11. Transfers outside the European Economic Area

We aim to store and process personal data within the European Economic Area (EEA). Some of our service providers — for example providers of analytics, advertising or cloud services — may process data outside the EEA.

Where that happens, we make sure an appropriate safeguard under Chapter V GDPR is in place, such as an adequacy decision of the European Commission or the European Commission's Standard Contractual Clauses combined with additional measures. You can request a copy of the relevant safeguards by contacting us.

12. How long we keep your data

We do not keep your personal data longer than is necessary for the purposes for which it was collected, unless a longer period is required by law. As a guideline:

Data	Retention period
Contact requests and correspondence	Up to 2 years after our last contact
Newsletter subscription data	Until you unsubscribe, and up to 3 months afterwards to process the unsubscribe
Campaign participant data (general)	Deleted as soon as the campaign has ended and the winners have received their prizes, unless a longer period applies below

Data	Retention period
Contact details of prize winners and proof of the draw	5 months after the draw, in line with the Dutch Code of Conduct for Promotional Games (Gedragscode Promotionele Kansspelen)
Delivery addresses for prizes and products	Deleted once delivery is complete and any complaint period has expired
Client, supplier and partner administration	For the duration of the relationship and up to 7 years afterwards, in line with the statutory tax retention obligation
Invoices and accounting records	7 years (statutory tax retention obligation)
Job application data	Up to 4 weeks after the procedure ends, or up to 1 year with your consent
Website and analytics data	14 months (the Google Analytics 4 retention setting we apply); cookie lifetimes are listed in section 8

Where a campaign is run on behalf of a client and that client is the controller, the retention period agreed with that client applies.

13. Your rights

Under the GDPR you have the following rights in relation to your personal data:

- **Access** — to be told whether we process your personal data and to receive a copy of it.
- **Rectification** — to have inaccurate or incomplete data corrected or completed.
- **Erase** — to have your data deleted where we no longer have a valid reason to keep it.
- **Restriction** — to have our use of your data limited in certain circumstances.
- **Data portability** — to receive the data you provided to us in a structured, commonly used, machine-readable format, and to have it transmitted to another organisation.
- **Objection** — to object to processing based on our legitimate interest, and to object to direct marketing at any time.
- **Withdrawal of consent** — where we rely on your consent, to withdraw it at any time. This does not affect the lawfulness of processing before you withdrew it.

How to exercise your rights

Send your request to info@benkactivation.com. To make sure the request really comes from you, we may ask you to confirm how and where you provided your data to us, or ask for additional information to verify your identity. We will not ask for more information than is necessary.

We will respond within one month of receiving your request. If your request is complex, we may extend this period by up to two further months and will tell you if we do.

Where we act as a processor for one of our clients, we will forward your request to that client without delay and let you know that we have done so.

Complaints

If you are not satisfied with how we handle your personal data, we would like to hear from you first so that we can put things right. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) via autoriteitpersoonsgegevens.nl, or with the supervisory authority in the EU country where you live or work.

14. Direct marketing and unsubscribing

Every commercial e-mail we send contains an unsubscribe link. You can also unsubscribe at any time by e-mailing info@benkactivation.com. We will remove you from our mailing list promptly and keep a minimal record of your unsubscribe request so that we do not contact you again by mistake.

15. How we protect your data

We take the protection of your data seriously and have implemented appropriate technical and organisational measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised alteration. These measures include:

- Encrypted connections (SSL/TLS) on our website and for data transfers.
- Access to personal data limited to those employees and partners who need it for their work.
- Password policies, multi-factor authentication and up-to-date software on our systems.
- Data processing agreements with all parties that process personal data on our behalf.
- A procedure for detecting, handling and, where required, reporting personal data breaches.

If you believe your data is not properly secured, or you have indications of misuse, please contact us at info@benkactivation.com.

16. Changes to this privacy statement

We may amend this privacy statement, for example when our services or the applicable rules change. The current version is always published on benkactivation.com and shows the date on which it was last updated. We recommend that you review it from time to time. If a change is significant, we will make this clear on our website or, where appropriate, notify you directly.

17. Contact

If you have any questions about this privacy statement or about how we handle personal data, please contact us:

BENK — Buro Benk B.V.

P.O. Box 13061, 3507 LB Utrecht, The Netherlands

info@benkactivation.com

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