PRIVACY STATEMENT

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1. Who we are

H3 Company B.V. (“H3”, “we”) is a limited liability company based in Amsterdam, the Netherlands (KvK 97964468). We advise organisations on AI adoption, process redesign and new business models, and deliver programmes and hands-on enablement. H3 Company B.V. is the controller for the personal data described in this statement, except for assessments as described in the next paragraph.
When we run an assessment such as Compass for an organisation, that organisation is the controller and we process the answers on its behalf under a data processing agreement. The notice shown at the start of the assessment says who is responsible, what we keep and for how long.
For Compass, the answers are stored with Supabase in Stockholm, Sweden, and the names and email addresses of participants with Upstash in London, United Kingdom. Invitations are sent by email through Resend from Ireland. The Compass app runs on Vercel in Frankfurt, Germany. We analyse the answers with AI through our business account with Anthropic (Claude Team). We keep Compass data for 24 months, including the link between your name and your answers, so that a later remeasurement can be compared with your own earlier answers. Your organisation can ask us to keep it for a shorter period.
Questions about how we handle your data? Email hello@h3.company. We aim to respond within five business days.

2. What data we collect and where it comes from

We collect personal data from several sources:

- Directly from you: when you contact us, book a conversation, complete the AI Horizon Scan, subscribe to Field Notes, sign a proposal or take part in a session or programme.
- Your employer or client organisation: when we receive participant lists for a programme, workshop or engagement.
- Publicly available professional sources: LinkedIn profiles and company websites, used for business-to-business contact with decision-makers.
- Meeting tools: meetings you attend with us may be transcribed to support our work. We say so in the invitation and again when the meeting starts. You can object before or

during the meeting, and we then stop recording (see section 3).

- Our website: statistics and marketing cookies when you visit h3.company and accept them via our cookie banner (see section 9). If you accept marketing cookies, we also use the IP address of your visit to recognise the organisation you visit from (see section 3).

The categories of data we typically process are: name, job title, employer, business email address, phone number, your AI Horizon Scan answers and result, and meeting or project content. We do not process special category data (such as health, religion or biometric data) in the normal course of our work, and our services are aimed at organisations, not at children.

Providing your data is voluntary. Without contact details we cannot answer a request, book a conversation or send you your AI Horizon Scan result; nothing else depends on it. Where we obtain your data from a public source or from your employer rather than from you, we tell you at our first contact with you (with a link to this statement), and in any case within one month.

3. Why we process your data and on what legal basis

Purpose	Legal basis (GDPR)	What this covers
Responding to your request	Art. 6.1.b, steps at your request, and Art. 6.1.f, our interest in answering enquiries	Contact form, booking a conversation, sending your AI Horizon Scan result
Contract execution and delivery	Art. 6.1.b, performance of a contract	Client communication, programme and workshop delivery, project files, invoicing
Tax and financial obligations	Art. 6.1.c, legal obligation	Retention of financial records and invoices for 7 years under Dutch tax law

Field Notes newsletter	Art. 6.1.a, consent	Sending Field Notes to the address you subscribed with; unsubscribe at any time
Business-to-business contact	Art. 6.1.f, legitimate interest: our commercial interest in reaching decision-makers at organisations we can help	Contacting people based on publicly available professional profiles; weighed against your interests, and you can object at any time
AI-assisted service delivery	Art. 6.1.f, legitimate interest: delivering efficiently and keeping accurate engagement records	Use of AI tools for preparation, note-taking and internal workflows; no automated decisions are made
Meeting transcription	Art. 6.1.a, consent	We say so in the invitation and again when the meeting starts. You can object before or during the meeting, and we then stop recording
Notes on the people we work with	Art. 6.1.f, legitimate interest: preparing well and following up accurately	Notes on contacts at our clients and prospects, see the paragraph below this table
Basic site statistics (no cookies)	Art. 6.1.f, legitimate interest: understanding aggregate site usage	Vercel Web Analytics: aggregated page views and referrers; nothing is stored on your device and you are not identified
Recognising visiting organisations	Art. 6.1.a, consent via cookie banner (marketing)	Snitcher matches the IP address of a visit to the company it belongs to and shows us that company and the pages it viewed. It identifies organisations, not people. It is loaded only after you accept marketing cookies, and then sets one cookie to recognise a returning visit. You can withdraw at any time via the cookie banner

Website statistics	Art. 6.1.a, consent via cookie banner	Google Analytics 4 and PostHog (product analytics). Neither is loaded until you accept statistics cookies; before that, no data about your visit is sent to Google or PostHog
Website marketing and retargeting	Art. 6.1.a, consent via cookie banner	LinkedIn Insight Tag and Meta Pixel; not loaded until you accept marketing cookies. For this collection we and LinkedIn and Meta are joint controllers, see section 5
Legal compliance	Art. 6.1.c, legal obligation	Responding to requests from the Dutch Data Protection Authority (AP) or court orders

Notes on the people we work with. To work well with the people at our clients and prospects, we keep notes on your role, what you told us, the positions you took in our meetings and what matters to you in the work. AI tools help us summarise these notes; we keep them to what was said or done, with a source, and we do not score people or record anything about health, private life or beliefs. You can ask to see these notes and object to them at hello@h3.company.

4. How long we keep your data

Category	Retention period	Basis
Contact and booking information	12 months after the last meaningful contact	Legitimate interest; follow-up
AI Horizon Scan answers and result	12 months after you receive your result	Delivering and following up on your result
Field Notes subscription	Until you unsubscribe	Consent; we keep the minimum needed to honour an unsubscribe
Financial records and invoices	7 years	Dutch tax law (Belastingdienst)
Client communications and project files	2 years after the end of an engagement	Legitimate interest; business continuity

Meeting transcripts and notes	2 years after the end of the engagement (same as project files), or earlier on request	Legitimate interest; engagement record
Prospect records that did not become clients	2 years after last contact	Legitimate interest; deleted on expiry or on request
Website statistics (GA4)	14 months	Consent; GA4 data-retention setting
Website product analytics (PostHog)	12 months	Consent; PostHog data-retention setting
Company-visit records (Snitcher)	12 months	Consent; deleted on expiry or on request
Compass answers, and participant names and email addresses	24 months, including the link between name and answers for a later remeasurement, unless your organisation asks for a shorter period	Data processing agreement with your organisation
Marketing cookies (LinkedIn, Meta)	See the cookie table in section 9	Consent; per-provider cookie lifetime

After the applicable period, data is deleted or anonymised. You may request earlier deletion (see section 8).

5. Who we share your data with

Service providers acting on our behalf (processors). These services process personal data only on our instructions. The table lists each one, its location and the safeguard that protects transfers outside the European Economic Area.

Service	Purpose	Company based in	Where the data is stored	Legal safeguard
Vercel	Website hosting, server-side form handling, cookieless site statistics; hosting the Compass app	US	Website: US. Compass app: Frankfurt, Germany	SCC via Vercel DPA

Resend	Delivering site messages, AI Horizon Scan results and Compass invitations by email	US	Compass invitations are sent from Ireland (EU); other site messages: US	SCC via Resend GDPR terms
Supabase	Storing Compass answers	Singapore (Supabase Pte. Ltd.)	Stockholm, Sweden (EU); support and administration also outside the EEA	Supabase DPA with SCCs; data stored within the EEA
Upstash	Storing the names and email addresses of Compass participants	US (Upstash, Inc.)	London, United Kingdom; support and administration from the US	EU adequacy decision for the United Kingdom (valid until 27 December 2031); Upstash DPA with the EU-US Data Privacy Framework and SCCs
Cal.com	Scheduling when you book a conversation	US	US	SCC (data processing terms)
Google (Analytics 4, Workspace)	Website statistics (loaded only after you accept statistics cookies); email, calendar and files	US	US	SCC + EU-US Data Privacy Framework (DPF)
PostHog	Website product analytics (how visitors use the site); loaded only after you accept statistics cookies	US	US	SCC + PostHog DPA
Snitcher	Recognising which organisations visit the website (from the IP address); loaded only after you accept marketing cookies, see section 3	EU (Germany)	EU (Germany)	Processing within the EEA; data processing terms

Anthropic (Claude)	AI assistance for preparation, notes and internal workflows, and analysing Compass answers	US; our contracting party is Anthropic Ireland, Limited	US	Business account (Claude Team): Data Processing Agreement with SCCs; no model training on our data
Fireflies.ai	Meeting transcription (with participant consent)	US	US	SCC (data processing terms)
Granola	Meeting notes	US	US	SCC (data processing terms)
Notion	Internal knowledge base and team workspace	US	US	SCC
Attio	Relationship management (CRM)	UK	To be confirmed	Attio DPA, part of the customer agreement
Unipile	Connection to LinkedIn, email and WhatsApp for business contact	EU (France)	To be confirmed	Unipile DPA
GitHub	Storage of our own documents and reports	US	US	GitHub DPA
Slack	Internal messages	US	US	Slack DPA, part of the customer terms
n8n	Processing website forms	EU (Germany)	To be confirmed	n8n DPA
LinkedIn Insight Tag	Advertising measurement; loaded only after you accept marketing cookies, see the paragraph on advertising platforms below	US	Ireland and US	LinkedIn terms for marketing services
Meta Pixel	Advertising measurement; loaded only after you accept marketing cookies, see the paragraph on advertising platforms below	US	Ireland and US	Meta Business Tools Terms

A complete list of our service providers and sub-processors, including those we use for client work, is at h3.company/legal.

Advertising platforms (joint controllers). If you accept marketing cookies, **LinkedIn** (Insight Tag) and **Meta** (Meta Pixel) collect data about your visit for retargeting and campaign measurement. For that collection on our site we are joint controllers with them; they then process the data under their own responsibility and privacy policies: LinkedIn, Meta. Both are US companies relying on SCCs and the EU-US Data Privacy Framework. You can withdraw at any time via the cookie banner, and you can also exercise your rights with them directly.

Other recipients. Where necessary we share limited data with our accountant and bookkeeping software, our bank and payment providers, legal advisers, and public authorities (such as the Belastingdienst or the Autoriteit Persoonsgegevens) when the law requires it.

We do not sell your personal data. We do not share your data with other organisations for their own marketing purposes. If we are required by law to disclose data to a public authority, we do so only to the extent legally required.

6. International data transfers

Several of the services above are based in, or route data through, the United States. Where this is the case we rely on the European Commission's Standard Contractual Clauses (SCCs), the EU adequacy decision for the United Kingdom (for Upstash) and, where the provider is certified, the EU-US Data Privacy Framework (DPF) as the legal mechanism for the transfer. The AI services we use for client work run on business terms with a data processing agreement and do not use your data to train their models. Providers may keep limited data for security and abuse monitoring under their own terms. Data may be processed in the US. You can request a copy of the safeguards we rely on (the SCCs) by emailing hello@h3.company.

7. Automated decision-making and AI tools

We use AI tools (including Claude by Anthropic) to assist with preparation, note summarisation and internal workflow tasks, and to analyse Compass answers for the organisation that commissioned the assessment. For client work we use business AI accounts only. **No automated decisions are made that produce legal or similarly**

significant effects on individuals. A person at H3 reviews AI-generated output before it is used in client-facing work.
The AI Horizon Scan generates a result from the answers you give. That result is informational: it is not a decision about you and has no legal or similarly significant effect. We do not use profiling or automated scoring of individuals for creditworthiness, employment suitability or any equivalent purpose.
If you prefer that we do not use AI tools on your messages or meeting notes, tell us at hello@h3.company and we will handle them without AI, unless the law requires otherwise.

8. Your rights

Under the GDPR you have the following rights regarding your personal data:

- **Access**: request a copy of the data we hold about you.
- **Rectification**: ask us to correct inaccurate data.
- **Erasure**: ask us to delete your data where we have no overriding legal obligation to keep it.
- **Restriction**: ask us to limit how we use your data while a dispute is resolved.
- **Data portability**: receive your data in a structured, machine-readable format.
- **Objection**: object to processing based on legitimate interest. We will stop unless we can demonstrate compelling legitimate grounds that override your interests. If you object to direct marketing, we always stop.
- **Withdraw consent**: where processing is based on consent (newsletter, meeting transcription, cookies), withdraw it at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

How to exercise your rights: email hello@h3.company with a clear description of your request. We respond within **one month**. For complex requests we may extend this by a further two months and will tell you within the first month if so. We do not charge a fee.
If you are not satisfied with our response, you can lodge a complaint with the Dutch Data Protection Authority: autoriteitpersoonsgegevens.nl.

9. Cookies

Our website uses cookies and similar technologies in three categories that you choose via our cookie banner, plus one cookieless measurement that does not depend on your choice (listed below). You can change your cookie preferences at any time: the “Cookies” button in

the bottom-left corner of every page reopens the banner, and withdrawing is as easy as accepting.

- Necessary (no consent required): strictly needed for the site to work, including remembering your cookie choice.
- Statistics (consent required): Google Analytics 4 and PostHog (product analytics), to understand how visitors use and move through the site. Neither is loaded until you accept statistics: before that, nothing is sent to Google or PostHog and nothing of theirs is stored on your device. Once loaded, both set an identifier that recognises your browser on a later visit. PostHog runs in the United States and session replay is not enabled. Withdrawing removes the Google Analytics and PostHog cookies we set and reloads the page, after which neither is loaded.
- Marketing (consent required): the LinkedIn Insight Tag and Meta Pixel, used to show relevant content to people who visited h3.company and to measure campaigns, and Snitcher, which recognises the organisation you visit from based on your IP address (see section 3). None of them is loaded until you accept marketing. For this collection we and LinkedIn and Meta are joint controllers, see section 5. Withdrawing removes the Meta and Snitcher cookies we set and reloads the page, after which none of them is loaded; cookies that LinkedIn sets on its own domain are managed through your LinkedIn account settings.
- Site statistics without cookies (no consent required, legitimate interest, see section 3): Vercel Web Analytics counts aggregated page views and referrers. It sets no cookie and stores nothing on your device, and it does not identify you.

Cookie	Provider	Category	Purpose	Lifetime
h3-consent.* (currently v1)	H3 (local storage)	Necessary	Remembers your cookie choice	12 months, or until you clear it or change your choice
None (no cookie)	Vercel Web Analytics	Site statistics	Aggregated page views and referrers; nothing stored on your device	n/a
_ga, _ga_*	Google Analytics	Statistics	Distinguishes visitors and sessions	Up to 2 years

ph_*_posthog (cookie and local storage)	PostHog	Statistics	Distinguishes visitors and sessions (product analytics)	Up to 12 months
li_sugr, lidc, bcookie, li_gc, UserMatchHistory, AnalyticsSyncHistory, ln_or	LinkedIn	Marketing	Retargeting and ad measurement	1 day to 1 year
_fbp, _fbc	Meta	Marketing	Retargeting and ad measurement	90 days
snitcher_device_id, snitcher_session	Snitcher	Marketing	Recognises the organisation you visit from and a returning visit	1 year; session: 30 minutes after your last activity

10. Security

We take appropriate technical and organisational measures to protect your personal data against loss, unauthorised access or disclosure, including access controls, two-factor authentication on key systems, and encryption in transit and at rest where supported by our providers.
In the event of a personal data breach that poses a risk to your rights and freedoms, we notify the Dutch Data Protection Authority within 72 hours and inform affected individuals without undue delay.

11. Changes to this statement

We may update this statement as our services or legal obligations change. The date at the top reflects the most recent version. For material changes affecting existing clients, we notify you directly.
This statement is also available in Dutch. Both versions say the same; should they differ, the version most favourable to you applies.

12. Contact

Controller: H3 Company B.V. • **KvK:** 97964468
Address: Jacob Bontiusplaats 9, 1018 LL Amsterdam, the Netherlands
Email: hello@h3.company • **Website:** h3.company