

# Privacy Statement

## 1. Introduction

In this privacy statement we explain what data we process about you if we have, want to get or have had a business relationship with you. We also tell you why and for how long we process your data and what your rights are in relation to any processing. In addition, we provide information about the parties we work with and our security policies, among other things.

It is important to us that our services are reliable and transparent. We handle your personal data with discretion and care and we ensure that any processing of your data complies with the applicable laws and regulations.

## 2. Controller of personal data processing

The Controller is:

	Changetalent
Address:	Sainte Marielaan 3
Zipcode:	4635 AA
Location:	Huijbergen
Tel-nr.:	085 06 04 355
E-mail:	info@changetalent.eu

## 3. Privacy manager

We have appointed a Privacy Manager. This is not a 'Data Protection Officer' as referred to in Article 37 of the AVG. However, it is someone who ensures that your data is processed in accordance with the law. The Privacy Manager's duties include monitoring and handling inquiries and complaints. The contact details of our Privacy Manager are:

Jeroen van den Brink, info@changetalent.eu, 085 06 04 355.

## 4. The personal data we process

Depending on your relationship with our organization and the purpose for which we process data, we record (always some of) the following data:

- a. First and last name
- b. Gender
- c. Date of birth
- d. Place of birth
- e. Address information
- f. Telephone number
- g. E-mail address
- h. Job details
- i. Training and course data
- j. Data on historical participation in events
- k. Bank account number
- l. Data about your activities on our website

## 5. For what purpose and on what basis we process personal data

We process your personal data for the following purposes:

- a. keeping financial records
- b. processing and executing orders
- c. organizing (customer) events
- d. sending newsletters or mailings
- e. monitoring website visits

The processing grounds are those referred to in Article 6 of the AVG (consent, agreement or legitimate interest).

## **6. Automated decision-making**

We do not make decisions based on automated processing about matters that could (significantly) affect individuals. These are decisions that are made by computer programs or systems, without a person (eg one of our employees) between them.

## **7. How long we keep personal data**

In general, we do not retain your data longer than necessary for the purposes for which we collected it. The retention period may vary from case to case. An example is that we need to keep some documents for a minimum period of time for tax or administration purposes. In these cases, we will retain only the data necessary to fulfill our legal obligations. After the legal retention periods, we will delete or anonymize your data.

## **8. Sharing personal data with third parties**

We do not share your personal data with third parties, unless this takes place within the framework of executing an agreement with you and in order to comply with a possible legal obligation. Insofar as these third parties are to be considered processors, we have concluded a processing agreement with those third parties which regulates, among other things, security, confidentiality and your rights. We remain responsible for these processing operations.

We engage third parties in the above manner and on the above grounds for the following categories of processing:

- a. keeping financial records
- b. organizing (customer) events
- c. sending newsletters or mailings
- d. monitoring website visits

## **9. Cookies, or similar techniques, that we use**

We use cookies on our website. This is a small text file that is stored in the browser of your computer, tablet or smartphone the first time you visit this website.

We use the following cookies:

- a. cookies with a purely technical functionality. These ensure that the website works properly and that, for example, your preferences are remembered. These cookies are also used to make the website work properly and to optimize it.
- b. cookies that track your surfing behavior so that we can offer you tailored content and advertisements. When you visit our website we have already informed you about these cookies and asked your permission to place them.

c. cookies placed by third parties. These are for example advertisers and/or social media companies.

You can opt out of cookies by configuring your internet browser to stop storing cookies. In addition, you can also delete any information previously stored via your browser settings.

## 10. Your rights (inspection, modification, deletion, etc.)

Your rights with regard to the processing of your data are explained below

a. Right of inspection

You have the right to access your own data. This includes the questions on what the purpose of processing is, to which parties the data is provided and what the retention periods are.

b. Right to rectification

You can ask us to rectify your data immediately. You also have the right to complete incomplete data, for example by sending us an email.

c. 'Right to be forgotten'

You have the 'right to be forgotten.' Upon request, we will erase your data without unreasonable delay. However, we may not always delete all of your data. Sometimes the processing is still necessary, for example, to comply with legal obligations or to make, exercise or substantiate claims.

d. Right to restriction of processing

In principle, you have the right to have the processing of your data restricted, for example if you believe that your data is incorrect or the processing of the data unnecessary.

e. Notification of rectification, erasure or restriction

Unless it is impossible or involves a disproportionate effort, we will notify the recipients of your data of any rectification, deletion or restriction of the processing.

f. Right to data portability

You have the right to transfer data. This means that you can make a request to receive your data. You can then save this data for personal reuse. You only have this right in relation to data that you have provided us yourself and if the processing is based on consent or an agreement to which you are a party.

g. Withdrawal of consent

If the data processing is based on consent, you have the right to revoke that consent at any time. However, the processing of your data for the period prior to withdrawal remains lawful.

h. Right to object

In principle, you have the right to object to the processing of your data. After your objection we will in principle stop the processing of your data.

i. Complaint to the Dutch Data Protection Authority or to the court

If you are of the opinion that the processing of your data violates the law you can contact our Privacy Manager, but you also have the right to lodge a complaint with the Personal Data Authority (AP) or go to court.

j. Restrictions on your rights

Sometimes we may restrict your rights, for example in the context of the prevention, investigation, detection and prosecution of criminal offences, such as fraud.

To ensure that the request for access has been made by you, we will send you a number of control questions after receiving your request that you must answer before we can process the request. This is to protect your privacy. We will respond to your request as soon as possible, but at the latest within four weeks.

## 11. How we secure personal data

We take the protection of your data seriously and take appropriate measure to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification. If you have the impression that your information is not properly secured or there are indications of misuse, please contact our privacy manager.

## **12. Amendments**

We may amend this statement if developments give cause to do so, for example in the case of new forms of processing. The most current privacy statement can be found on our website. We recommend that you consult this privacy and cookie statement regularly so that you are kept informed of the changes.

[date]