

## Privacy Statement

### **Data**

Ludens Talentontwikkeling B.V.  
Bergseweg 28  
3633 AK Vreeland  
Registered with the Chamber of Commerce under number: 52416925

Contact person for matters concerning privacy is Ms B. Zomer.

Further (contact) details can be found at the: [www.ludenstraining.nl](http://www.ludenstraining.nl)  
In this Privacy Statement we refer to ourselves as: "us", "we", or "our".

### **Website**

If we make mention of a website, the abovementioned website is referred to.

### **Cookies**

If you use the website, the following cookies are used: collecting and analysing statistics (Google Analytics). This causes no or minor consequences to the privacy of the website visitors.

These cookies are kept for about six months. We do not process full IP addresses and no full IP addresses or other data are shared with Google.

### **Personal Data**

#### **a. General and purposes.**

We process personal data for a number of purposes:

- i. The first purpose is to process personal data of our clients and contractors/trainers for the performance of the agreements we conclude with them, since we have to maintain contact with our clients and contractors/trainers to conclude an agreement with them, implement it, and be able to invoice it.
- ii. The second purpose is that we process personal data of participants. We do so pursuant to an agreement or pursuant to a legitimate interest.
- iii. The third purpose is that we process personal data of our relations in order to send them (news) reports. We do so pursuant to a legitimate interest.
- iv. The fourth purpose is to process personal data of potential clients or interested parties who leave their (contact) details on our website (via our contact form). We only use these personal data to contact and maintain contact with the persons concerned. We do so pursuant to a (precontractual) agreement.
- v. The fifth purpose is that we process personal data if, in the context of an agreement concluded with a client, we engage a third party such as a trainer, hotel, or transport provider and we provide these parties with some personal data of the participants. We do so pursuant to an agreement or pursuant to a legitimate interest.

#### **b. Which personal data?** The (personal) data of our clients that we process are mainly:

- name, residence, country
- telephone number, email address

- agreements
- correspondence
- CoC-number
- financial, invoice, and payment details related to agreements

The personal data of participants that we process are mainly:

- first name, surname, gender
- email address, telephone number
- date of birth
- any dietary needs or other particulars,
- where applicable: participant's plan of action, notes

The personal data of contractors/trainers/freelancers that we process are mainly:

- name, address, residence, country
- telephone number, email address
- agreements
- correspondence
- CoC-number
- financial, invoice, and payment details related to agreements

c. **Provision to third parties.**

- Names and mobile numbers of participants are disclosed to a group of participants. For the duration of the training a WhatsApp group is also created.
- We do not provide personal data to third parties, unless they are engaged by us for the performance of the agreement concluded with our client. For example: the trainers, hotel, or transport provider engaged by us.
  - o The trainer receives from us the following personal data of the participants: first name, surname, gender, email address, telephone number, date of birth, name of employer/manager.
  - o A hotel receives from us the following data: first name, surname, gender, and any particulars such as dietary needs.
  - o A transport provider receives from us the first name and last name and any other data relevant for the transport.
- We send our client anonymous final assessments.

d. **Hosting and service providers.** Personal data are stored on a server and in various software applications.

e. **Terms.** We keep personal data for the following terms:

- Data relating to our legal status for a period of five years.
- For tax records we use the terms applied by the Tax Authorities.
- Data of participants will be deleted within three months after completion of the training process.
- Under the heading 'Cookies' a retention period has also been mentioned.
- Data we receive via the contact form on our website will be deleted if and as soon as it is clear that the resulting contacts will not lead to an agreement.

f. **Who gives us personal data?** We receive personal data from our (potential) clients and participants.

***Security of personal data***

Personal data will be processed in a secure environment and within the European Union. We have taken security measures at several levels. We periodically assess the degree of security and, if necessary, adjust our security policy.

### ***Rights of Data Subject***

The person whose personal data we process (the Data Subject) has various rights pursuant to the General Data Protection Regulation. It concerns, briefly, the following.

- The Data Subject may request access to his processed personal data.
- The right of rectification of his personal data.
- The right to request erasure of personal data.
- The right to restriction of processing.
- The right to data portability.
- The right to object.

The exact content of these rights and any limitations thereof are laid down in the General Data Protection Regulation and we comply with what is laid down therein in respect of these rights.

### ***Complaint***

If you are of the opinion that your privacy rights have been breached, you have the right to lodge a complaint at the Dutch Data Protection Authority (<https://autoriteitpersoonsgegevens.nl>).

### ***Data breaches***

In the case of a personal data breach, we shall without undue delay notify the personal data breach to the Dutch Data Protection Authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

In the case a personal data breach is likely to result in a risk to the rights and freedoms of natural persons, we inform the Data Subject of the personal data breach without undue delay.

### ***Version of this Privacy Statement***

This Privacy Statement was last adapted on 3 July 2018.