

Rijswijk Childcare Foundation Privacy Regulations

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1. Introduction

As a childcare organisation, we place a high value on the protection of personal data belonging to our customers, collaboration partners and our employees (including flex-workers, trainees and volunteers). The Rijswijk Childcare Foundation and related brands wish to provide clear and transparent information about how we deal with personal data. The Rijswijk Childcare Foundation safeguards privacy in accordance with the relevant rules and regulations. As of 25 May 2018, the Data Protection Act (DPA) was replaced by the General Data Protection Regulation (GDPR). Following from this:

- We process personal data for the sole purpose for which it was provided.
- We are aware of personal data and any special categories of personal details.
- We explicitly ask for your permission in cases where this is required when processing your personal data. You can revoke your permission at any time, unless we need specific data to allow you to access our services.
- We have taken suitable technical and organisational measures to safeguard your personal data.
- We will not pass on personal data to third parties, unless this is required for the performance of the services that they were provided for.
- We are aware of and respect your rights regarding your personal data and wish to bring these rights to your attention.

If you have any questions or comments regarding privacy or would like to report a data breach or a possible data breach, please do not hesitate to contact us.

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2. Customer data

When you become a customer of Rijswijk Childcare Foundation, we have to inform you adequately about the Dutch Childcare Act (Dutch: Wet Kinderopvang). This concerns information about placement, our terms and conditions, complaints procedures, educational policy and many other matters. We give you this information through our website and our newsletters. You will automatically receive newsletters if you are one of our customers. If you no longer wish to receive these newsletters, you need only to inform us.

The Rijswijk Childcare Foundation has various brands and works together with integrated child centres that may apply their own extended privacy policy. The law on careful handling and processing of your data applies in the same way at all locations.

Processing personal data

We deal with general and special personal data. Personal data is processed for various purposes such as administration, communication, invoicing and for the continuous improvement of our services. The purpose of using this personal data is to allow us to carry out our contract with you as our customer.

3. Collaboration partner data and supplier data

The Rijswijk Childcare Foundation works together with partners such as the education sector, municipalities, youth care and various other organisations as required. Personal data belonging to our collaboration partners and suppliers is processed for the purpose of informing and connecting with one another, thus allowing us to work toward our visions and goals. The purpose of using this personal data is to enable the collaborations we have entered into. The Rijswijk Childcare Foundation works with suppliers for maintenance, products and services necessary for the proper functioning of our organisation. Personal data is saved for the above-mentioned processing for as long as we consider someone as a collaboration partner or supplier. Agreements made with suppliers are safeguarded in a processing agreement.

4. Employees

The Rijswijk Childcare Foundation works with professionals, flex-workers, trainees and volunteers. Personal data of all employees is processed with the goal and purpose of implementing the employment contract, training contract or volunteer agreement.

5. Other matters related to legislation

Provision to third parties within the EU

We provide personal data to third parties if it is essential for carrying out our objectives or if we are legally obliged to do so. We do not provide personal data to parties outside the EU unless we have examined and given approval that they have protected themselves against security risks. We never pass on personal data to other parties with whom we have not signed a processing agreement. Naturally we always enter into appropriate agreements to safeguard the protection of your personal data with other parties or processors. We can share personal data with third parties only after you have provided us with written approval.

Minors

We only process personal data of minors (people under the age of 16 years) if we have received written approval from the parent, carer or legal guardian. From the age of 16, a child has their own rights.

Retention period

The Rijswijk Childcare Foundation does not save personal data any longer than required for the purposes for which the data was provided or for the legally required period. Retention periods are based on rules and regulations such as the Public Records Act, the Dutch Civil Code, educational and tax data. The privacy regulations do not provide an exact term. An internal 'retention period and registration' policy can be found as part of Rijswijk Childcare Foundation's quality system, explaining which data is destroyed immediately, after 1 year, 2 years, 3 years, 5 years or 7 years.

Security

The Rijswijk Childcare Foundation has taken appropriate technical and organisational measures to protect personal data from unauthorised processing, including the following measures:

- Everyone who has access to data on behalf of Rijswijk Childcare Foundation is bound to confidentiality. Employees are authorised by system managers for certain tasks.
- If possible, a username and password policy is applied to systems.
- If necessary, we can pseudonymise and provide encryption of personal data, for example in certain reporting.
- We make backups of personal data to ensure we can restore the data in case of physical or technical problems.
- We regularly test and evaluate our security measures.
- Our employees are informed about the importance of protecting personal data.

Rights and obligations related to data

You have a right of access and right to rectification or deletion of personal data we have received from you. You can also object to the processing of your personal data, or part thereof, by us or by one of our data processors. You also have the right to ask us transfer data provided by you, either directly to you or directly to another party, on your request. We will ask you provide identification before we can respond to such requests. We are entitled to charge administration costs for your request if collecting the data is time-consuming or requires a lot of effort.

If you have given us permission to process your personal data, you always have the right to revoke this.

It is important for the work in the childcare location that data is correct, hence customers, collaboration partners, suppliers and employees should keep their data up-to-date.

To ensure optimal communication, it is important that our communication methods are adequate. We communicate with others via our websites, newsletters, emails, social media, etc., meaning that customers, collaboration partners, suppliers and employees have access to these sources and can thus gain access to, process and react to our information.

Data Protection Officer

In certain situations, it is compulsory for organisations to appoint a Data Protection Officer (DPO). This is someone within the organisation who monitors the implementation of and compliance with the General Data Protection Regulation. This is compulsory for:

- Governments and public authorities or bodies
- Large-scale monitoring of individuals (as a core activity)
- Processing special categories of sensitive personal data (e.g. health, race, political views, religion or criminal records) as a core activity

EU member states are also entitled to stipulate other situations where it is compulsory to assign a DPO. It is still unknown if this will happen in the Netherlands. The Rijswijk Childcare Foundation has two DPOs registered with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Complaints, queries and comments

Customers, collaboration partners, suppliers and employees are requested to contact us directly in the case of complaints, questions or comments regarding the implementation of the privacy law within the Rijswijk Childcare Foundation, for instance relating to the processing of personal data or the surveys we have conducted internally. Naturally we would be very disappointed if we were unable to come to a mutual agreement. We have an official internal complaints procedure in place in our childcare locations and we are members of the Dutch Childcare Complaints Boards (Geschillencommissie Kinderopvang), acting as an external complaints body. Customers, collaboration partners, suppliers and employees also have the right to submit a complaint about the processing of their personal data or that of their child to the Dutch DPA, www.autoriteitpersoonsgegevens.nl.

Sources

We used the following sources while compiling these regulations:

- General Data Protection Regulation
- The Dutch DPA (Autoriteit Persoonsgegevens)
- GDPR tool provided by the industry association BMK, 'AVG voor verenigingen' ('GDPR for associations')