

CompaNanny Privacy Policy

CompaNanny stands for quality care in all senses of the word, so you can rest assured that CompaNanny will handle your personal data with care. CompaNanny is also committed to using clear language in our communications and therefore wants to inform you about the personal data that we process as clearly as possible.

About CompaNanny

This Privacy Policy explains how we, CompaNanny Nederland B.V. and the other entities within the CompaNanny group (hereinafter referred to as: 'CompaNanny', 'we' or 'our'), handle personal data in a fair, transparent and secure manner. The CompaNanny organisation focuses on childcare. It is fundamentally important that we safeguard the privacy of the children in our care, their parents and potential clients, website and other visitors, and suppliers.

Personal data includes any information that can be directly or indirectly related to you ('Personal Data'). This can include a name, a telephone number, an address or an identification number. CompaNanny Nederland B.V., with its registered office in Amsterdam and registered with the Chamber of Commerce under number 34264824, acts as the data controller of Personal Data for clients (parents of the children in our care) and potential clients, website and other visitors, and suppliers.

Which Personal Data does CompaNanny collect and use?

The exact types of Personal Data that we collect and use are described below and depend on the relationship that we have with you.

- **Website visitors:** we collect the following Personal Data when you visit our website:
 - **your contact details:** when you complete the contact or download form on our website, we collect your name, e-mail address and the details of your request.
 - **automatically collected data:** when you visit our website, we automatically collect your electronic identification data via your browser or device and by using cookies and similar technologies. Read our Cookie Statement if you would like to know more about the data that we automatically collect about you.
- **Clients and potential clients:** to establish a relationship with you as a client, we process the following Personal Data:
 - **your contact details:** your name, your e-mail address, your address, telephone number and any other contact details that you provide us with.
 - **your registration details:** the Personal Data required to register for childcare and the further provision of our services, such as your gender, date of birth, place of birth, marital status, address, postal code and National Insurance Number (BSN).
 - **your use of our services:** the Personal Data related to the use of our services, such as information about your use of the KidsKconnect app.
 - **your financial details:** the information that you provide us with for invoicing purposes, such as your bank account number.
- **Client's children:** to be able to provide the right care for your children and to be able to contact you, we process the following data about your children:
 - **identification details of your child:** name, address, postal code, date of birth or expected date of birth, gender, National Insurance Number (BSN).
 - **health and safety data:** your child's Personal Data that is required to ensure your child's health and safety, such as insurance details, parental authority status, family situation, contact details of GP and pharmacy, medical information including illnesses and allergies, use of medication, vaccination details, sleeping and eating habits.
 - **childcare details:** the Personal Data required to provide the appropriate childcare, such as dietary options, jewellery, outings, photos (shared via the online parent portal).

- **Suppliers:** to establish a relationship with you as a supplier, we process the following Personal Data about you and the company you work for:
 - **your contact details:** your name, your e-mail address, your address, telephone number and any other contact details that you provide us with.
 - **your financial details:** the financial information provided to us that can be linked to you as a client or supplier, such as bank account or invoice details.
- **All other personal data:** all other Personal Data that you disclose as part of your relationship with us.

What are the legal bases for processing the data?

Before we collect and use your Personal Data, we always ensure that we process your Personal Data in accordance with applicable law and that we have a legal basis for this processing. The legal bases on which we process your Personal Data are:

- for the performance of our agreement with you.
- to comply with our statutory obligations.
- based on your consent.
- to pursue our legitimate business and other interests (or those of third parties).

Why does CompaNanny process your Personal Data?

We only process your Personal Data for specific and limited purposes that are linked to the legal bases described above. These purposes are:

- **To perform our agreement.** To perform the agreement that we have concluded or will conclude with you and to provide you with the information or the services that you requested. For example, we will need to process your Personal Data to maintain contact with you, to communicate about your registrations, to manage and deal with requests, to provide technical or other support or customer service and to provide essential information about the services.
- **To comply with our statutory obligations.** To comply with statutory obligations, such as keeping accurate business records, to comply with requests from government agencies, regulatory bodies or tax authorities and to comply with applicable legislation and regulations.
- **Based on your consent.** We can automatically collect data when you visit our website by placing cookies and similar technologies on our website and in doing so collect data for analytical purposes. In addition, we process Personal Data that we require to provide childcare for your children. We can post photos in the parent portal, provide specific meals

tailored to dietary requirements or organise outings, for instance. We can also inform you about availability at childcare locations or send you news items.

- **For our legitimate business and other interests.** This includes:
 - managing our internal customer database (CRM system).
 - carrying out and expanding our business activities and services.
 - developing and improving the quality of our services.
 - implementing company policies and procedures, for education and training purposes, for example.
 - monitoring and protecting the integrity, safety and security of our systems, buildings and premises. This includes preventing unauthorised access to our buildings and protecting our facilities.
 - enabling us to carry out business transactions such as mergers, sales, reorganisations, transfers of our assets or activities, or acquisitions.

With whom does CompaNanny share your Personal Data?

To fulfil the purposes described above, we sometimes have to share your data with other companies that help us provide our services. These parties will only have access to your Personal Data if this is strictly necessary to perform their tasks or services. We do this on a strict need-to-know basis and we ensure that we enter into contractual agreements with these companies before we share your Personal Data. These companies are:

- **Other entities within CompaNanny.** We will share your Personal Data internally between the relevant CompaNanny entities for internal administrative purposes, management purposes or other business-related purposes as described in this Privacy Policy.
- **External service providers.** We engage external service providers to provide us with certain services. These include IT service providers, hosting providers, cookie providers, financial institutions, accountants, consultants and other professional advisers.
- **Third parties so as to comply with legal requirements.** Such as tax authorities, insurance institutions or other law enforcement agencies.
- **Third parties in the event of business transactions.** These include companies that are involved in mergers, sales or reorganisations or companies that we acquire.

Where is your Personal Data processed?

After we have collected your Personal Data, it is stored and processed further within the European Economic Area (EEA). It is possible that we may use external service providers located outside the EEA in the future. As a result, we may need to communicate your Personal Data outside the EEA. If this is the case, we will implement appropriate safeguards (and additional measures where necessary) to ensure that your Personal Data is protected to a level equivalent to that guaranteed in the EEA. This could include entering into model contract clauses approved by the European Commission with the recipients of your data.

If in the future we communicate your Personal Data outside the EEA, you can request a copy of all documentation demonstrating that adequate security measures have been taken by contacting us at privacy@compananny.nl.

How does CompaNanny protect your Personal Data?

It is important to us that we protect your Personal Data effectively. We have therefore taken appropriate technical and organisational measures to protect your Personal Data against unauthorised or unlawful use or access. These measures include:

- All CompaNanny employees are bound by confidentiality and will not share Personal Data with third parties unless there is a legal or medical necessity to do so.
- Access to your Personal Data by other CompaNanny employees is limited to those who require access for one of the purposes mentioned in this Privacy Policy.
- CompaNanny employees will discuss privacy-sensitive topics with you at an appropriate time and place.
- Only those CompaNanny employees who are involved in providing services to your children will have access to the personal data required for this purpose.
- CompaNanny only uses secure computer programs, servers and connections.
- Physical files are kept to a minimum and are stored in lockable cabinets.
- Our head office is secured by physical access control, a card system and an alarm code. Only authorised persons have access to our premises.
- Our branches are secured 24 hours a day with an access control system. Access is only possible with a cardkey or tag. In addition, the Branch Manager's office has a good view of the front door, where possible.

How long does CompaNanny retain your Personal Data?

We ensure that your Personal Data will not be stored longer than necessary for the purpose for which it was obtained (to provide our childcare services, to answer questions or to resolve problems, for instance) unless retaining it longer is necessary to comply with legal obligations (such as tax obligations) or to defend a legal claim. Your Personal Data in the parent portal, for example, is retained for up to two months after your children's last day of childcare. However, certain data is subject to longer statutory retention periods.

If you would like more information on how long we retain your Personal Data, please contact privacy@compananny.nl.

What are your rights with regard to your Personal Data?

You have various rights with regard to your Personal Data processed by CompaNanny:

- You have the right to access, update, delete or restrict the Personal Data that we have collected about you and you can always obtain a copy of your Personal Data that we have stored or you can request that the information be transferred to another data controller.
- You also have a right to object to the processing of your Personal Data when we invoke our legitimate interests.
- If you have given us consent, you can withdraw this consent at any time if you change your mind. Please note that withdrawing consent does not affect the legitimacy of any processing that has already taken place before the consent was withdrawn and that we can only take action on your request in accordance with applicable law.

To exercise the above rights, you can submit a request to our Customer Care department on + 31 (0)20 417 0117 or privacy@compananny.nl. To enable us to comply with your request as best as possible, please indicate which Personal Data you wish to receive, change or delete or which restrictions you wish to place on our use of the data.

CompaNanny will process your request as soon as possible, and in any case within the statutory period set for this purpose. CompaNanny will comply with your request, if and insofar as you are entitled to do so in the case in question.

If you are not satisfied with the way we process your Personal Data or if you believe that your data protection rights have been violated, you have the right to lodge a complaint with the regulatory body in the country where you live or work or where you believe your rights have been violated. In the Netherlands this is the Dutch Data Protection Authority (AP).

Links to other websites

You will occasionally find links to other (non-CompaNanny-related) websites on the CompaNanny website. As these websites are owned by other parties, CompaNanny is not responsible for the handling of your Personal Data on these websites or for the privacy of the information collected by the services provided by these websites. We recommend that you carefully read the privacy policies that apply to these websites.

Contact us

If you have any questions or comments about this Privacy Policy or the processing of your Personal Data in general, or if you wish to exercise any of your rights, please send an e-mail to privacy@compananny.nl, stating the nature of your question.

CompaNanny reserves the right to amend this Privacy Statement if, for example, there are changes in the processing or the applicable legislation.