

# CompaNanny

## Privacy Statement

CompaNanny stands for good care, in all areas. You can therefore assume that CompaNanny handles personal data with care too. CompaNanny also stands for clear communication and therefore wants to convey in a clear way the manner in which it processes personal data.

### About CompaNanny, personal data and processing

CompaNanny Nederland B.V. – hereafter 'CompaNanny', 'we' or 'us' – has its registered office in Amsterdam, the Netherlands, and is registered with the Chamber of Commerce under number 34264824. The CompaNanny organisation is focused on childcare. Ensuring the privacy of the children in our care, their parents/guardians, our employees, our (website) visitors, and other contacts is of fundamental importance.

CompaNanny processes your personal data in accordance with applicable privacy legislation, including the General Data Protection Regulation (GDPR; *Algemene Verordening Gegevensbescherming, AVG*). The term 'personal data' refers to every piece of information that directly or indirectly leads to the identification of an individual, such as a name, an ID number, location data, an online identifier; or one or more elements that are characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that individual. Examples of 'processing' are: collecting, recording, organising, structuring, storing, updating or modifying, retrieving, consulting, using, providing by means of forwarding, distributing or otherwise making available, aligning or combining, screening, erasing or destroying data.

### To whom does this Privacy Statement apply?

This Privacy Statement applies to all individuals in respect of whom CompaNanny processes personal data. Examples of this are:

- visitors to our website;
- CompaNanny clients: i.e. the parents/guardians whose children are in our care;
- potential clients of CompaNanny;
- candidates;
- suppliers;
- (other) third parties who liaise with CompaNanny;

### Which personal data does CompaNanny process and why?

CompaNanny processes personal data that you have provided to us and personal data generated during your visit to our website. In general, CompaNanny processes personal data for the following purposes:

- to maintain contact with you;
- to provide services in the field of childcare;
- to ensure the health and safety of the children in our care;
- to comply with our statutory (storage) obligations;
- the representation of CompaNanny's legitimate interests, for example in the context of the handling of a complaint;
- for the security, use and improvement of our website;
- to improve the quality of our services.

Group	Data processed	Why
Visitors to the website	Information regarding your visit to our website; information about the device you used to visit our website, for example your IP address; and your browsing habits and interests.	For the security, the use and the improvement of our website.
Clients	Parents'/Guardians' first name; surname; gender; date of birth; social security (BSN-) number; address; hometown; postal code; e-mail address; telephone number; and marital status.	For identification purposes and for the purpose of contacting you concerning you child(ren).
	Bank account number.	For invoicing.
Children	First name; surname; gender; (expected) date of birth; social security (BSN-) number; address; hometown; postal code; and parents/guardians' telephone number.	For identification purposes.
	Insurance details; status of parental authority; family situation; contact details of the child's General Practitioner and pharmacy; medical data such as illnesses and allergies; medication use; vaccination data; and sleep and eating habits.	For service optimisation and for the child's health and safety.
	(Consent for) dietary options; jewellery; outings; taking photos; and sharing photos with parents/guardians via our digital Parent Portal.	For service optimisation and for the child's health and safety.
Potential Clients	First name; surname; e-mail address; telephone number.	For contact with you to plan a guided tour and answer any questions.
Candidates	surname; date of birth; place of birth; nationality; social security (BSN-) number; address; hometown; postal code; e-mail address; telephone number; work experience; and the documents you have uploaded.	To give you the opportunity to communicate with CompaNanny about vacancies; and to participate in the related application procedures.
Contacts of suppliers	First name and surname.	For contact purposes, in connection with the services and/or products (to be) supplied by your company.

### What are the principles for the processing?

The processing of personal data may be necessary for concluding a contract or in the run-up to it. If you grant us a contract to provide services in the field of childcare, we process personal data if and insofar as this is necessary for the performance of that contract.

Furthermore, the majority of the personal data we process is processed on the basis of permission granted for this. This applies in any case to the personal data of children; the processing of their personal data requires permission from the person who has parental responsibility for that child. If you do not want CompaNanny to process the personal data (which it processes with permission) further, you can withdraw your consent. CompaNanny will then stop processing the personal data unless the law or a legitimate interest of CompaNanny or a third party prohibits it. If CompaNanny

stops processing personal data at your request, this may result in you no longer being able to use this website and its associated services.

We do not store the personal data for longer than is necessary for the purpose for which you have provided the personal data unless longer storage is necessary to comply with a legal obligation or to represent a legitimate interest of CompaNanny. For example, there is an administrative retention obligation of seven (7) years for certain data. Personal data provided to CompaNanny within the framework of an application will be retained for up to four (4) weeks after the application procedure has been completed unless you have consented to the longer-term storage thereof. CompaNanny's digital Parent Portal is available for up to two (2) months after your child(ren)'s last day of childcare. Thereafter, the personal data, as far as is legally permitted, is removed. Finally, there is processing based on a legitimate interest of CompaNanny, such as processing in the context of internal management, for effective communication and for quality improvement.

### How does CompaNanny protect your personal data?

CompaNanny does its utmost to take appropriate technical and organisational security measures to protect your personal data against loss or against any form of unlawful processing. The following principles apply:

- CompaNanny does not process more data than is necessary to provide its services to you/your child(ren) and to realise the other aforementioned goals.
- All CompaNanny employees are bound by confidentiality and will not share personal data with third parties, unless there is a legal or medical need for this.
- Only those employees of CompaNanny who are involved in the service pertaining to you/your child(ren) have access to the personal data that is required for this.
- CompaNanny employees will discuss privacy-sensitive topics with you at the right time and place.
- CompaNanny only uses secure computer programs, servers and connections. Only the devices managed by CompaNanny have direct access to our systems. Devices that are not managed by CompaNanny can only access our systems via a VPN connection that is protected by passwords and 2-factor authentication. Our systems are continuously monitored for suspicious activities. This monitoring is carried out by a certified third party.
- Physical files are kept to a minimum and are stored in cupboards equipped with locks.
- Our head office is safeguarded by physical access control, a pass system and an alarm code. Only authorised persons have access to our premises.
- Our branches are safeguarded 24 hours a day with an access control system. Access is only possible with a pass or tag. Furthermore, the Branch Manager's office – wherever possible – has a good view of the front door.
- When a third party is enlisted by CompaNanny for the performance of activities, CompaNanny ensures that the third party maintains the same level of security and confidentiality as that maintained by CompaNanny.
- Transfer of personal data to parties in countries outside of the European Economic Area will, if at all, only take place in accordance with the requirements set by the applicable privacy legislation.
- Requests made to CompaNanny by third parties to provide personal data that do not arise from a legal obligation are only granted with your explicit permission.

### Your Rights

If desired, you can exercise the following rights at any time:

- **Access:** you can ask CompaNanny to view the personal data that CompaNanny processes about you and to obtain a copy thereof;
- **Amendments or additions:** if personal data that CompaNanny processes about you is not correct or incomplete, you can ask CompaNanny to amend or supplement it;
- **Removal:** if you no longer consent to CompaNanny processing your personal data or if you believe that it is no longer necessary for CompaNanny to process your personal data for the purpose for which you provided it to CompaNanny, you can ask CompaNanny to delete the relevant personal data;
- **Restriction:** if you suspect that CompaNanny is processing more personal data than necessary, you can request

- CompaNanny to process less personal data;
- **Objection:** if you are in doubt about whether your personal data is being processed legitimately by CompaNanny, you can object to the processing thereof;
  - **Data portability:** if you have provided personal data to CompaNanny and CompaNanny processes this personal data digitally, you can request CompaNanny to make this personal information available to you in digital form.

To exercise the rights mentioned above, please submit a written request to our Customer Care Department via [info@compananny.nl](mailto:info@compananny.nl) or verbally via 020-4170117. CompaNanny will process your request as soon as possible, and in any case within the statutory deadline set for this. CompaNanny will comply with your request if and insofar as you are entitled to it in the relevant case.

### Customer satisfaction

At CompaNanny we attach great importance to customer satisfaction. If you are in any way not satisfied or something has not gone according to your wishes, please do not hesitate to inform us via [info@compananny.nl](mailto:info@compananny.nl) or 020-4170117. We will do everything possible to find/provide a satisfactory solution. If you are still not satisfied with the outcome, you can then follow our complaints procedure (also via [info@compananny.nl](mailto:info@compananny.nl) or 020-4170117). Furthermore, you have the right and the possibility to file a complaint about the processing of personal data by CompaNanny with the Dutch data protection authority (Dutch DPA; Autoriteit Persoonsgegevens) at any time.

CompaNanny reserves the right to change this Privacy Statement, for example if changes to the processing occur or if the applicable legislation changes.