

Zaltbommel, the Netherlands  
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Privacy policy

VISITING ADDRESS  
Van Heemstraweg West 5  
5301 PA Zaltbommel  
The Netherlands

POSTAL ADDRESS  
P.O. Box 266  
5300 AG Zaltbommel  
The Netherlands

CONTACT  
T +31 (0) 418 688 666  
info@schoutenglobal.com  
www.schoutenglobal.com

Chamber of Commerce: NL 11069418  
VAT no.: NL 8180.73.469.B01

Founded by Schouten & Nelissen

## PRIVACY POLICY

The following definitions indicated with an initial capital are used in this document:

- a. **Privacy Policy:** the policy adopted and conducted by Schouten & Nelissen with respect to the use and processing of personal data as laid down in this document.
- b. **Schouten & Nelissen:** the conglomerate of companies to which the Privacy Policy applies, namely SNR Schouten Global B.V. as well as its subsidiaries: SNR Schouten & Nelissen Recovery B.V., Schouten & Nelissen B.V. and SNR Schouten Training B.V.
- c. **Website:** the Schouten & Nelissen website at [www.sn.nl](http://www.sn.nl)
- d. **Personal Data:** the data provided by clients and participants of Schouten & Nelissen as referred to in the Personal Data Protection Act (Wbp) and the General Data Protection Regulation (GDPR) after 25 May 2018.
- e. **User:** any person who uses the Website.
- f. **Client, Participant:** any third party that has concluded an agreement with Schouten & Nelissen pursuant to which Personal Data may be provided.
- g. **Confidential Information:** information obtained by Schouten & Nelissen during the performance of the activities (training, education, coaching, etc.), which it qualifies as confidential and to which the provisions of this Privacy Policy apply.

### General

Schouten & Nelissen has been the leading training and consultancy agency for personal, team, and organisational development since 1980. Privacy-sensitive data are registered for the purpose of the Schouten & Nelissen activities. Schouten & Nelissen handles these data in accordance with the provisions of the Personal Data Protection Act and after 25 May 2018 in accordance with the provisions of the GDPR. As far as these personal data are concerned, Schouten & Nelissen also acts in accordance with the professional code for psychologists of the Dutch Association of Psychologists (NIP). An internal code of conduct also applies to all Schouten & Nelissen employees that includes provisions with respect to the protection of all privacy-sensitive information.

### Article 1 The objectives of recordings are:

- performance of all activities that are related to the registration for and participation in training, education, coaching, personal tests and/or scans with respect to leadership training or in-house projects for example;
- compliance with requests for information from the Client and Participants; sending newsletters and other informative messages, interesting training courses and developments within the context of relevant legislation;
- performing analyses in order to improve services;
- performing all other activities and processing related to the business operations of Schouten & Nelissen;
- granting access to online learning programmes;
- announcing information about participants via its own website / learning portal;
- calculating, laying down and collecting costs that are related to the requested services (including handing over claims to third parties);
- settlement of disputes;
- performing (an) audit(s);
- compliance with accreditation criteria (University);
- implementation or application of another act.

**Article 2 Schouten & Nelissen processes the following personal data:**

- name, first names, initials, title, gender, date of birth, address, postcode, place of residence, telephone number and similar data required for communication (such as the e-mail address) as well as the client's or participant's bank account number;
- an administration number if this does not include information other than the data referred to in the previous point;
- nationality and place of birth of the client or participant;
- data that are required with a view to the health or wellbeing of the participant;
- data that concern the nature and progress of the education;
- data that concern the study results that have been achieved;
- data required for organising the education;
- data for calculating, laying down and collecting training costs;
- data concerning teachers and supervisors, to the extent these data are relevant to the organisation and issuing instructions, providing coaching and training;
- data for compliance with the accreditation criteria of the Accreditation Organisation of the Netherlands and Flanders (NVAO), exclusively intended for University and concerns specifically a copy of the passport, curriculum vitae and a copy/copies of diplomas from previous education;
- data other than those listed above that must be processed pursuant to a different act.

**Article 3 The personal data are provided to:**

- those who:
  - are charged with the activities listed above under 1; or
  - provide supervision of the activities listed above under 1; or
  - are involved necessarily in the activities listed above under 1.
- other persons, if:
  - the client or participant has consented unambiguously to the data processing; or
  - the data processing is necessary for compliance with a statutory obligation; or
  - the data processing is necessary in connection with a vital interest on the part of the participant (such as laying down a food allergy); or
  - the data are further processed for historical, statistical or scientific purposes. Schouten & Nelissen ensures that the data are actually *only* processed further for these specific purposes; or
  - it's a part of a product or training provided by us, through our partner New Heroes B.V., we offer a subscription as a result of which online training can be followed for a period of 6 months; or
  - it's a training that is provided via third parties.

#### **Article 4 Confidentiality**

Schouten & Nelissen always handles personal data and Confidential Information with due observance of the provisions of the Personal Data Protection Act and after 25 May 2018 of the GDPR.

Schouten & Nelissen employees are bound by contractual obligations on the basis of which they are required to handle Personal Data and Confidential Information in accordance with the Personal Data Protection Act and/or the GDPR. Insofar as Schouten & Nelissen hires third parties in the performance of activities for Clients and Participants, it will conclude an agreement with these third parties, as a result of which confidentiality of Personal Data and Confidential Information is guaranteed sufficiently.

#### **Article 5 Use and storage of privacy-sensitive data**

The processing of Personal Data and Confidential Information is exclusively intended for the purpose for which they were transferred and registered. Schouten & Nelissen does not make Personal Data and Confidential Information available to third parties, unless this is the express wish of the Client or Participant or if the data transfer is necessary for the performance of the assignment.

Your data are stored only within the EU in principle, but there is one exception to this. Schouten & Nelissen offers several management programmes via an agency that is established outside the EU. Your data are shared with this agency if you make use of this management programme. Storage outside the EU is allowed under the GDPR, provided a company satisfies strict privacy conditions. Naturally, we ensure that our partners comply with these conditions in accordance with Article 46, paragraph 2, point F of the GDPR. These are safeguarded by the issue of a US Privacy Shield. You can check this by clicking on this [link](#).

#### **Article 6 Security, storage and deletion**

Schouten & Nelissen has implemented the necessary measures to promote the physical, technical and organisational security of privacy-sensitive information so that the registration thereof is secured against unauthorised consultation, provision, alteration and/or deletion of data and against fire and comparable dangers, burglary and theft.

Schouten & Nelissen ensures that it complies with the provisions of this regulation for as long as it applies, with due observance of the provisions of the Personal Data Protection Act and after 25 May 2018 of the GDPR.

In accordance with legislation, privacy-sensitive data are stored for 60 months after termination of the agreement for the indicated purposes or for as long as prescribed by law. We will ask your consent for further communication after this term.

Your data are removed immediately after you have requested such.

## **Article 7 Provision of data within Schouten & Nelissen**

Within Schouten & Nelissen, Personal Data and Confidential Information are provided only to Schouten & Nelissen employees who should have access to this information due to their position and if such is in accordance with the purpose of the registration thereof.

## **Article 8 Provision of data to third parties**

Schouten & Nelissen will only transfer the Personal Data and Confidential Information to third parties if:

- a) this information is transferred to a processor engaged by Schouten & Nelissen for the purposes listed in this Privacy Policy, with which processor Schouten & Nelissen has concluded an agreement that ensures that the processor provides sufficient safeguards with respect to the technical and organisational security measures with respect to the processing to be performed;
- b) it's necessary to forwarding your name to the accommodation where the training is attended;
- c) it's necessary to forwarding your name, address, postcode and place of residence to the distributor of course materials

and/or

- d) Schouten & Nelissen is obliged on the basis of statutory obligations to transfer the Personal Data or Confidential Information to the competent authorities.

Our website includes several links to websites of third parties. Schouten & Nelissen does not bear any responsibility for the manner in which these parties handle your data. You should therefore check whether the site you visit includes a privacy statement. If so, read this statement in order to determine whether you agree with the Privacy Policy of the relevant party described therein.

## **Article 9 Right to inspect and amend**

Clients, Participants and Users have the right to inspect, amend, supplement, delete and screen, and the right to data portability of, his/her Personal Data and/or Confidential Information, such in accordance with the provisions of the Personal Data Protection Act and the GDPR after 25 May 2018. In the event a Client, Participant or User wishes to exercise one or more of these rights or if he/she has questions about the Schouten & Nelissen Privacy Policy, he/she may send an e-mail to Schouten & Nelissen at [privacy.officer@sn.nl](mailto:privacy.officer@sn.nl).

## **Article 10      Cookies**

Schouten & Nelissen uses cookies. The Schouten & Nelissen 'Cookie policy' that includes further information concerning the use of cookies, including the purposes for which Schouten & Nelissen uses cookies, can be found at <https://www.sn.nl/over-schouten-en-nelissen/cookies>.

## **Article 11      Changes to the Privacy Policy**

Schouten & Nelissen reserves the right to change this Privacy Policy. Any change will be announced on this page of the Website. Schouten & Nelissen therefore recommends that Clients, Participants and Users regularly visit this page to check whether changes have been implemented. This version is dated 8-5-2018.

Schouten & Nelissen stores your personal data with due care. Please contact our Privacy Officer if this is not the case or if you have other questions regarding your privacy. You can do so in writing: *Schouten & Nelissen BV. attn. Privacy Officer, Van Heemstraweg West 5; 5301 PA Zaltbommel*; by e-mail: *privacy.officer@sn.nl* or by telephone at *0418-68.86.51*.

You can contact the Dutch Data Protection Authority, PO Box 93374, 2509 AJ, The Hague, in case of escalation.

Further information can be found at [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).