

Privacy statement Bink Childcare

Bink Childcare, located at Laapersveld 75-2a, 1213 VB Hilversum, is responsible for the processing of personal data, as shown in this privacy statement.

The regulations apply to all processing of personal data within Bink Childcare.

Contact details:

<https://binkkinderopvang.nl>

Laapersveld 75-2a, 1213 VB Hilversum

+31 35 683 44 99

Bink Childcare has a data protection officer, J. Schildwacht. She can be reached via j.schildwacht@cedgroep.nl. Bink Childcare also has a security officer, who can be reached via privacy@binkkinderopvang.nl.

Bink Childcare appreciates the trust you place in us and is happy to inform you about the safety and privacy of your personal information. The data about you and your children that we process are handled and protected with the utmost care.

With this privacy statement we explain why we collect certain information, how we protect your privacy, what rights you have and under what conditions we provide the information to you or others.

Laws and regulations

The General Data Protection Regulation (*AVG*) applies as of 25 May 2018. From that date, the same privacy legislation applies throughout the European Union. At present the member states still have their own national laws, based on the European privacy directive of 1995. Bink Childcare follows the General Data Protection Regulation (Dutch: *Algemene verordening gegevensbescherming* or *AVG*). The *AVG* imposes requirements on the use of information that can be traced to natural persons.

Purposes of collecting personal data

Bink Childcare processes personal data only for the purposes for which they have been collected and the objectives that are consistent with them, namely waiting list registration,

child registration, observation lists, financial administrative registration, complaints registration, filing registration, personnel registration, applicant registration, work guidance, coaching, internal training and internal analyzes. Data used for external market research is anonymised at all times.

Bink Childcare also processes personal data for the following purposes:

- handling payment;
- sending our newsletter and / or advertising brochure;
- to call or e-mail you if this is necessary for carrying out our services;
- to inform you about changes to our services and products;
- to give you the opportunity to create an account;
- to comply with our legal obligations (such as providing information to the tax authorities).

What personal data are processed?

Bink Childcare processes personal data in order to be able to carry out its services, but will never collect more personal data than is necessary for the specific purpose.

Personal data that can be processed include:

- first and last name;
- sex;
- date of birth, place of birth and nationality;
- address details, telephone number, e-mail address;
- other personal data that you actively provide, for example by creating a profile on this website, in correspondence and by telephone;
- medical data that are important for the child's daily care and data about his / her development;
- profile picture of the child for identification purposes;
- information about your activities on our website;
- list of contact details via an app;
- internet browser and device type;
- bank account number, debtor number, data for calculating, recording and collecting parental contributions for the childcare;
- credit check: at Bink Childcare it is possible in exceptional situations to pay afterwards for the service you purchase. To make this possible – and to protect you and ourselves against abuse – we have your creditworthiness tested. We do this by providing the necessary personal data (including your address details) to a credit rating agency, who may use this information for this purpose only;

- our website and / or service do not intend to collect information about website visitors aged 16 or younger, unless they have permission from parents or guardians. However, we cannot check whether a visitor is 16 years or older. If you are convinced that we have collected personal information about a minor without this consent, please contact us via privacy@binkkinderopvang.nl, and we will delete this information;
- citizen service number (*BSN*).

Photos and other digital recordings

In the childcare centers, photos and video recordings are regularly taken / made:

- to inform parents about the activities and themes their child (ren) is / are working on;
- for work guidance, coaching and / or internal training of pedagogical staff (Video interaction counseling and Educational coaching with images);
- for other purposes, such as newsletters, external publications or publications on the internet site.

With regard to image recordings mentioned above, the assumption is made of what has been agreed with the childcare agreement / registration form in this respect. If nothing has been agreed upon regarding the childcare agreement / registration form in this respect, prior permission is requested from the parents for recordings or publication of the visual material.

Making image recording of employees takes place on the basis of necessity for agreement. The person concerned has an employment contract and training / coaching takes place for a better execution of the agreed work. Training and coaching within Bink mainly takes place by using Video interaction guidance and Educational coaching with images. The maximum retention period for visual material for the aforementioned purposes is three years after the recording.

Everyone is asked to handle photos and other digital recordings that are shared by Bink with integrity. It is forbidden to make image recordings of children and employees with your own camera at the location or on the premises.

Camera surveillance

If the management is of the opinion that the use of hidden cameras, both inside and outside, serves a legitimate interest, these cameras will be placed. A legitimate interest may include the protection of the employee, implementation of new measures within the sector, as well as the security of property.

Security

Bink Childcare handles your data with the necessary care. Your privacy is important to you as

well as to us. Bink Childcare takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification, including:

- Personal data may only be processed if one of the following conditions is met:
 - The data subject has given permission for the processing.
 - If this is necessary for the execution of an agreement to which the party concerned is a party, or for actions that are carried out at the request of the party concerned, or for actions that are carried out at the request of the party concerned and which are necessary for the conclusion of an agreement.
 - If this is necessary to comply with a legal obligation.
 - If this is necessary to combat a serious health risk for the person concerned;
 - If this is necessary in view of the interests of the controller or of a third party and does not prevail the interests of the party whose data are processed.
 - If this is of general interest (mainly government institutions);
 - If only functional users have access to the personal data.
- Personal data are only provided to a third party insofar as this results from the purpose of the registration. Personal data will not be provided to a third party outside the European Union.
- An employee who has knowledge of and / or has access to the personal data is obliged to maintain confidentiality. This obligation also applies after termination of the service or employment.
- The obligation to observe secrecy does not apply insofar as any statutory provision, based on statutory provisions and / or agreements, requires an employee to disclose personal data.
- The controller is responsible for taking and implementing appropriate technical and organizational measures to protect against loss or any form of unlawful processing, including through the following measures:
 - Filing cabinets containing personal data are to be closed when the user leaves the room.
 - Computer files in which personal data are processed are to be protected by passwords.
 - Management procedures including incident management are implemented and based on generally applicable and accepted security standards.

In the case of a data breach, this is to be reported to the data protection officer. If necessary, a data breach is reported to the Dutch Data Protection Authority and the involved persons will be informed.

Rules for the processing of special personal data

Special personal data will not be processed, except if there is a legal exception to the prohibition on processing special personal data, including:

- processing which is necessary for the performance of obligations and the exercise of employment law and social security law, as regulated in national law;
- processing that is necessary to protect the vital interests;
- processing for legitimate activities by a non-profit organization;
- processing of personal data that has been made public by the persons concerned and / or where permission has been given by the persons concerned;
- processing that is necessary for legal action or jurisdiction;
- processing operations with an overriding public interest;
- processing that is necessary for the purposes of health care, social services and incapacity for work, as regulated by a national law;
- processing that is necessary for public health, as regulated by a national law;
- processing that is necessary for archiving in the public interest, scientific or historical research or statistical purposes.

If you feel that your details are not properly secured or that there are indications of abuse, we ask you to first contact our security officer via privacy@binkkinderopvang.nl. If you are not satisfied with the handling of your complaint by our security officer, please contact our data protection officer via j.schildwacht@cedgroep.nl.

Bink Childcare also wants to point out that you have the possibility to submit a complaint to the national supervisor, the *Autoriteit Persoonsgegevens* (the Dutch Data Protection Authority). This can be done via the following link:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

Use of cookies on website

Bink Childcare uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit this website. Bink Childcare uses cookies with a purely technical functionality. These ensure that the website works properly and that, for example, your preferred settings are remembered. These cookies are also used to make the website work well and to optimize it. At your first visit to our website we have already informed you about these cookies and we have asked for your permission to place them. You can opt out of cookies by setting your internet browser in such a way that it does not store cookies anymore.

Inspection and correction of recorded personal data / rights of data subjects

You have the right to view, correct or delete your personal data. You can do this partly yourself via the personal settings in *Mijn Bink*. In addition, you have the right to withdraw your consent to data processing or to object to the processing of your personal data by Bink Childcare and you have the right to data portability. This means that you can submit a request to us to send the personal information we have in your computer file to you or another organization mentioned by you. If you wish to use your right of objection and / or right to data portability or if you have any other questions / comments about data processing, please send a specified request to privacy@binkkinderopvang.nl.

In order to ensure that the request for access has been made by you, we kindly request you to send a copy of your identity document with the request. Make your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and citizen service number (*BSN*) black in this copy, in order to protect your privacy. Bink Child care will respond to your request as soon as possible, but in any case within four weeks.

To whom are your details provided?

Bink Childcare shares your personal data with various third parties if this is necessary for the execution of the agreement and to comply with any legal obligation. We conclude a processor agreement with companies that process your data in our order, to ensure the same level of security and confidentiality of your data. Bink Childcare remains responsible for these processing operations.

In addition, Bink Childcare provides your personal data to other third parties. We only do this with your express permission or if this is permitted and required by law, for instance subpoenas and court orders and actions to detect fraud.

Retention periods

The management of Bink Childcare is responsible for the retention period of personal data.

In general, this implies that:

- personal data are not kept longer than necessary for the achievement of the purposes for which they are collected or subsequently provided, unless anonymised or insofar as they are exclusively for historical, statistical or scientific purposes. The maximum storage period is 7 years after termination of the agreement;
- care data will be removed from the active archive within two years or transferred to the parent;
- removal, however, will not take place when storage is legally required or if there is an agreement between the person concerned and the responsible person.