

Privacy Statement of Vertrouwen in Werk

Vertrouwen in Werk ('ViW') considers it essential to protect the privacy of its customers and business associates. Here you can read how we deal with your private and confidential data.

If you entrust an assignment to us, you want to be confident that third parties will not have access to that data. We request only the data we need to handle your assignment.

You can read below which data are involved and why we need them. You can also read how long we retain your data and what rights you have in relation to them.

This privacy statement was last amended on 21 October 2023.

1. For what purposes do we process your data?

ViW provides services in relation to a safe working environment: taking care of, guiding and supporting employees regarding undesirable behaviour; analysing incidents and advising the employer about them in the broadest sense; referring them to professional counsellors; dealing with complaints; providing information and prevention; identifying and advising as well as conducting investigations at the request of employers in the broadest sense.

The main purpose of processing your personal data is to perform these services.

ViW considers it essential that your personal data are handled properly and carefully. Not only because the General Data Processing Regulation (GDPR) requires it, but also because confidentiality and secrecy are essential in the services that ViW provides.

We need your data to perform our work. Confidential advisers, investigators and complaint handlers constantly deal with privacy-sensitive and confidential information; this is a core part of their work.

The confidential advisers working for you through ViW are all certified and work according to the guidelines of the National Association of Confidential Advisers (*Landelijke Vereniging van Vertrouwenspersonen*).

The data you provide to ViW are used only to provide services that relate to your case. Your data and information will be shared with others involved in your case only with your consent.

2. Where does the information come from?

You provide most of the information yourself. If you contact us by email or telephone, we process the data you provide. This includes the contact information you provide to us (e.g., name, email address, phone number) and the reason you are contacting us.

Client file

ViW uses the personal data you provide as part of an application for support to address your request for help. Because sensitive and/or special personal data may be processed during this process, we will always ask for your consent to process your personal data.

You give consent by providing your information to our administrative office; by giving consent to your confidential adviser who notes it in your personal file or directly by email to the person handling your case. You may choose not to share your data with us when you contact us. If you do not give this consent, your use of ViW's services may be limited.

This could affect the quality and duration of the support process because we cannot reach you or make follow-up appointments. You have the right to withdraw your consent at any time. ViW may then no longer process any of your data; ViW can no longer perform services for you from the time the consent is withdrawn and will immediately close your client file.

Sometimes another party involved in your case provides information about you, such as an employer providing a name and contact information so that we can contact you.

We process this information to perform the assignment. We assume that you have the same information about yourself that ViW does. This does not apply to internal documents not covered by the right of access, such as internal memoranda and telephone notes.

Invoicing

If you and/or your employer give us an assignment, we will also process the data needed to send invoices and process payments. For the services ViW provides, we never mention your personal data because all our contact with you is confidential.

3. Special personal data

We may process special personal data only with your express consent. In most cases, this involves medical information, for example, if there is incapacity for work. These data are processed under the confidentiality of the confidential adviser. Medical information is always kept confidential.

4. Processing personal data of people other than customers

Data from third parties, such as other individuals involved in a mediation, are also processed in many cases. That person is usually actively involved and knows that ViW processes personal data. Data is sometimes processed without the person's knowledge. This could happen, for example, if names of colleagues are mentioned in a confidential matter. These data are sometimes not needed or are only needed later when someone becomes actively involved. Until then, such data are kept confidential.

In the vast majority of cases, an involved third party (such as another involved party or legal assistance provider) knows that ViW is processing their personal data. There is contact because of the handling of the case and the purpose of that processing is also known.

If someone is unaware that ViW is processing personal data about them, it is because it is not in the customer's interest to share that information. In that case, that information falls under the professional confidentiality of ViW's confidential advisers.

5. Business operations

ViW works with electronic and physical files. Your personal data are processed through systems and software, and on paper. ViW keeps electronic records in a secure environment that third parties cannot access. Physical files are kept in a locked room. Only the person handling your case may view the contents of a file. Only your basic information is visible to several employees. The purpose of this, for example, is for our administrative office to make an appointment.

ViW agrees the same with third parties hired for the business operations as with its own employees.

6. Who has access to my data?

ViW's employees and third parties hired by ViW to handle your case may have access to your data insofar as necessary to perform their duties. All parties are bound to confidentiality under the rules of professional conduct for confidential advisers, complaints handlers and/or the GDPR.

7. Where are my data?

ViW and third parties hired by ViW keep records of when and to whom they provide which data. You can request this information from ViW at any time.

8. Data retention period

ViW retains your data for as long as we are working on your case, and in exceptional cases for seven years after completion. This period is based on statutory obligations that ensure that ViW can account for how your case was handled and the costs incurred in the process. In some cases, your or ViW have an interest in keeping a limited amount of data for a longer period. Those data are then retained for as long as that interest exists.

9. Data security

ViW implements both physical (organisational) and digital (technical) measures to secure your data in order to prevent loss, destruction or damage and against unauthorised and unlawful processing of your data.

ViW will report loss, theft or misuse of personal data to you as soon as possible. If the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) wishes to initiate an investigation as a result of a security incident or data breach, ViW will cooperate fully.

10. Your privacy rights

The GDPR gives you the right to:

- (1) access your data;
- (2) rectify (alter or supplement) or delete your data;
- (3) limit processing.

In addition, you have the right to object to the processing and use of your data. You also have the right to data portability: the right to receive your data for personal use, reuse or transfer to another organisation.

If you wish to know which personal data ViW processes about you, you can request to access your data. If your data appear incorrect, incomplete or irrelevant, you can make an additional request to have the data altered or supplemented.

ViW cannot comply with every request for access. ViW's employees have a duty of confidentiality. This means that ViW does not provide information from records to third parties.

If you ask ViW to delete your data, we will consider the request in relation to statutory (retention) obligations and other interests. If you wish to know something about your data and its processing, or want to exercise any of your rights, you can contact ViW.

ViW will then contact you within five business days to discuss your request. A check of your identity is part of this process.

11. Questions, comments and complaints about handling of personal data

ViW considers careful and thorough processing of personal data important. Questions, comments and complaints on this topic are a key source of improvement.

If you have any questions, comments or complaints, please send them to ViW (see our contact details).

You also have the right to file a complaint about improper data processing with the supervisory authority, the Dutch Data Protection Authority.

For contact information, see www.autoriteitpersoonsgegevens.nl.

12. ViW's contact details

ViW's address and other details:

Vertrouwen in Werk

Vlinderplein 10, 2805 KH GOUDA

Chamber of Commerce no.: 90635388

Administrative office phone no.: 085 888 0 886

Administration email: administratie@vertrouweninwerk.nl

Email: karinhermelink@vertrouweninwerk.nl

13. Privacy statement amendments

Vertrouwen in Werk has the right to amend this privacy statement. We will publish the amendments on the website. ViW therefore recommends that you read this privacy statement regularly.