

## **Privacy Regulations**

This document is intended to inform you concerning the manner in which your personal data is managed by Una Paloma Blanca Language School. Your personal data is processed as part of Una Paloma Blanca Language School's central administration; they are therefore (co)responsible for the security of this data.

## **Personal Data Protection Act**

The Personal Data Protection Act has been in effect since 1 September 2016. The aim of this act is to protect citizens from receiving unsolicited information or advertising in their (digital) mailbox. Una Paloma Blanca Language School is bound by this law and therefore adhere to a uniform process regarding the processing of personal data.

## **Article 1 Definitions**

Administrator: the registration of personal data is carried out by members of Una Paloma Blanca Language School and falls under the responsibility of the Responsible Party.

Client: individual, natural persons who have requested information from or registered with Una Paloma Blanca Language School, or who are a client who is receiving, or former client who has received lessons from Una Paloma Blanca Language School.

Registration: the structured file of personal data.

Third Parties: collectively all other parties, not being the 'involved' or the Administrator; Third Party means any individual Third Party, not being the 'involved' or the Administrator.

## **Article 2 Responsible party**

The Management of Una Paloma Blanca Language School is the Responsible Party for Personal Data Protection Act compliance.

### **Article 3 Applicability**

1. These Regulations are applicable to the manual and automated processing of personal data within Una Paloma Blanca Language School.
2. These Regulations are applicable to every Client of Una Paloma Blanca Language School.
3. These Regulations are also applicable to all Third Party referrals, even if the referrer adheres to another set of privacy regulations.

### **Article 4 Purpose for personal data collection**

Una Paloma Blanca Language School collect personal data to:

1. upon the Client's request, provide an answer to Client queries and/or information to the Client;
2. complete the Client registration process and administration for the personal intake appointment, as well as allow for proper processing of registration and payment for the desired course;
3. deliver the agreed upon tailor-made training programme;
4. communicate with the Client regarding his/her training;
5. To register the client with DUO (Education Executive Agency) in the context of integration programmes.
6. To collect course fees and costs for teaching materials in the context of integration programmes.
7. carry out analyses and (management) reports in order to improve service;
8. send the Client newsletters, brochures and/or flyers;
9. resolve Client complaints;
10. comply with legislation and regulations imposed upon Una Paloma Blanca Language School.

For any other situations, personal data shall only be processed with the explicit consent of the party/parties involved.

### **Article 5 Security measures and retention period**

The Responsible Party shall take all necessary measures to assure that the personal data which has been collected is used for the stated goals and is correct, accurate, sufficient

and not excessive in nature. These measures include the following:

1. The Responsible Party shall take the necessary technical and organisational measures in order to prevent personal data being lost, stolen or unlawfully processed in any other manner.
2. Access to the automated system is only possible by means of a password.
3. Personal data can only be accessed by staff members who have contact with the Client (see Article 7).
4. Personal data shall be saved for a maximum of 26 months after completion of training.

### **Article 6 Unambiguous consent**

The Client shall be informed concerning the purpose of the registration of personal data and asked to freely consent to registration. Under certain circumstances, Client signature of a training proposal implies that the Client grants authorisation to share personal data and results with Third Parties. This occurs in the case of networking events.

Should a change take place which affects how personal data is processed, the Client shall be asked for his/her consent.

### **Article 7 Registration**

1. Only the information specifically named below is taken up in the Registration:

Concerning (former) Client(s):

Personal data:

- surname, first name(s), initial(s), prefix(es);
- date of birth, birth country;
- level of education;
- home address with postcode, telephone number, email address,;
- the name and address of the referring organisation or employer.

#### Information concerning the language training and training form:

- language the Client has registered for (target language);
- start and desired end levels in the target language;
- Attendance records and examination results (exclusively for integration programmes in the context of the 'Blik op Werk' certification)
- training goals;
- any supporting languages;
- type of training programme;
- number of training days;
- training dates;
- level achieved at the end of training;
- multimedia exercises which were completed during training;
- post-course study advice;
- any special dietary needs.

#### Concerning the (former) contact person:

- surname, first name(s), initial(s), prefix(es);
- other than under

1. Meaning data which must be registered as a result of any statutory provision.

2. The type of information listed under section 1 above only refers to natural persons who have registered as a Client with Una Paloma Blanca Language School in order to follow a course, or who have followed a course with Una Paloma Blanca Language School.

#### **Article 8 Access to registration**

Staff members of Una Paloma Blanca Language School are authorised to add, amend and delete Registration information and personal data under the authority of the Responsible Party.

#### **Article 9 Provision of information within Una Paloma Blanca Language School.**

The following agents/departments reserve the right to periodically access personal data:

- Client Services/Client Support employees;
- receptionists;
- Marketing & Sales employees;
- Finance employees;
- Language trainers and other relevant language department staff members.

#### **Article 10 Provision of information to Third Parties**

1. Una Paloma Blanca Language School provide Client Registration information to the following Third Party for the purpose stated:
  - A. Settling disputes;
  - B. Performing audits;
  - C. Attendance records and examination results.

#### **Article 11 Camera surveillance**

The use of camera surveillance constitutes a form of processing personal data. The following, additional conditions apply to this:

1. Camera surveillance shall only be conducted:
  - to protect the health and safety of persons;
  - for surveillance in the institute building and grounds;
  - to monitor things which are in the building or in the grounds of the institute.
2. Positioning of cameras is clearly indicated.
3. With regard to the storage of the data captured by camera surveillance, images will only be stored if a camera is positioned to monitor things located in the building and in the grounds of the institute. The provisions specified in Article 5 above, shall apply mutatis mutandis to data captured by camera surveillance, provided that such data is not stored for longer than seven working days, except where irregularities have been captured.

## **Article 12 Web analytics**

Una Paloma Blanca Language School make use of Google Analytics and other web analytics services. These service make use of cookies to analyse how users use our website. With Google Analytics, the information concerning the use of the website (including your IP-address) is transferred and stored by Google on servers outside of Europe. Google uses this information to track how websites are used, to compose reports concerning website use for Una Paloma Blanca Language School, and to offer

other services regarding internet use. Google may provide this information to third Parties if required by law to do so or for the purpose of processing this data on behalf of Google.

## **Article 13 Designation and amendment**

These Regulations may be cited as “Privacy Regulations”. Una Paloma Blanca Language School retain the right to amend said Privacy Regulations.

We therefore advise reviewing the Privacy Regulations regularly in order to stay abreast of any changes. The Regulations were last updated on 23 May 2017