

PRIVACY REGULATIONS Foxtaal

ARTICLE 1. GENERAL TERMS AND DEFINITIONS

1.1. Unless expressly provided otherwise below, terms in this regulation are used in the way that the General Data Protection Regulation (AVG) Grants it.

1.2. Personal data

Any data concerning an identified or identifiable natural person.

1.3. Processing of personal data

Any action or set of actions involving personal data, including collecting, recording, organizing, storing, updating, modifying, retrieving, consulting, using, providing by means of forwarding, distributing or any other form of making available, piecing together, correlating, as well as shielding, erasing and shredding; data.

1.4. Responsible

The natural person, legal entity or anyone, administrative body that alone or together with others, that establishes the purposes and means of the processing of personal data.

1.5. Processor

The person who processes personal data on behalf of the responsible person, without being directly subjected to the authority.

1.6. User of personal data

The person who, as an employee or otherwise, is authorized to process personal data.

1.7. Person concerned

The person related to the personal data.

1.8. Client

A natural or legal person who has commissioned Foxtaal to provide services.

1.9. Third parties

Any person, other than the data subject, the controller, the processor or any person who is directly in authority of the controller or processor is authorized to process personal data.

1.10. Consent of the party involved

Any free, specific and information-based will by which the party involved accepts that his/her concerning personal data be processed.

ARTICLE 2. SCOPE

2.1. These regulations apply to all processing of personal data within Foxtaal.

ARTICLE 3. PURPOSE OF THE PROCESSING OF PERSONAL DATA

3.1. Foxtaal processes data for the following purposes:

- Communication with the participant in the context of the agreed integration course;
- Data exchange with DUO regarding exams and diplomas for the Quality Mark Integration;
- Data exchange with the organization that carries out the satisfaction survey for the Integration quality mark;
- Reporting and accountability to the client;
- Compliance with legal obligations (for example, tax and social insurance law and legislation);
- Mentoring students or giving study advice;

- Providing or making learning materials available;
- Publishing information about pupils, participants or students on one's own website;
- Announcing the activities of the establishment or the institute on its own website;
- Calculating, recording and collecting registration fees, school and tuition fees and contributions or fees for study materials and extracurricular activities (including transfer of claims to third parties);
- attending to disputes;
- Conducting an audit;
- Conducting correct, timely and complete (financial) administrative tasks.

3.2. Personal data will not be processed in a way that is in conflict with the purposes for which they were obtained.

ARTICLE 4. DATA PROCESSED

4.1 At most, the following data will be processed:

- last name, first names, initials, title, gender, date of birth, address, zip code, place of residence, telephone number and similar data required for communication (e.g. e-mail address), along with the bank account number of the student;
- an administrative number, if it does not contain any information other than the information referred to in the previously mentioned data;
- nationality and place of birth of the student;
- the details of the student's parents, guardians or caregivers referred to in the first point;
- data that are essential regarding the health or well-being of the student;
- data that are linked to the student's religion or belief, as far as these are necessary for his/her education;
- data that are pertinent to the nature and course of education;
- data relating to the attained study results;
- data for organizing the education;
- data for supplying and arranging the learning materials;
- data for calculating, recording and collecting registration fees, school and tuition fees and contributions or compensation for educational materials and extracurricular activities; photos and video images (with or without sound) of activities of the establishment or institute;
- data from teachers and supervisors, as much as this data is important for the organization; the establishment or institution and the provision of education and training;
- data intending to adequate registration of and evidence for the reason of termination of the Civic Integration Process;
- data other than those listed above if they must be processed on the ground of another law.

ARTICLE 5. PROCESSING PERSONAL DATA

5.1 The responsible party is accountable for the proper functioning of the processing of the data personal data and for compliance with the provisions of these regulations. His actions, regarding the process of the personal data, and the provision of data is determined by these regulations.

5.2 The responsible party shall take the necessary measures to encourage the correctness and completeness of the recorded data. He also provides the necessary facilities with technical and organizational nature to protect the personal data against loss or impairment of the data and against unauthorized access, modification or provision thereof.

5.3 Personal data is processed if the data processing is necessary for the execution of an agreement where the data subject is the party, or to comply with a legal obligation where the subject is responsible.

5.4 The processing of data on ethnicity, religion and health receives specific attention. No data on ethnicity and religion is kept. Health data is processed with the explicit consent of the data subject.

ARTICLE 6. ACCESS TO PERSONAL DATA

6.1. The personal data may only be provided to:
those, including third parties, who

- are in charge of the above under article 3.1. listed activities, or
- managing the above under article 3.1. listed activities, or
- are necessarily involved in the above under Article 3.1. listed activities.

Others, if:

- the student has given explicit permission for the data processing, or
- the data processing is necessary for the fulfillment of a legal obligation by the educational institution, or
- the data processing is necessary because of a vital interest of the student (for example, a urgent medical need), or
- the data is further processed for historical, statistical or scientific purposes.

This is under the condition that the educational institution makes sure the data is only available for this specific purposes are further processed.

ARTICLE 7. SECURITY OF PERSONAL DATA

7.1. Personal data is handled with care. For this purpose, the documents containing data are protected with a password. Information on paper is kept in the locked cabinets (lockers).

7.2. Anyone who has access to the personal data has a duty of confidentiality regarding the data that he has become aware of based that access.

7.3. Third parties hired by Foxtaal to perform work have access to the processing of personal data, insofar as this is necessary for the performance of their duties, and are bound by the obligation of confidentiality through a contractual agreement.

ARTICLE 8. PROVISION OF PERSONAL DATA

8.1. Unless this is necessary for the implementation of a statutory regulation, the permission of the data subject is required for the provision of personal data to third parties.

ARTICLE 9. ACCESS TO RECORDED DATA

9.1. The person concerned has the right to inspect and receive a copy of the data relating to his/her person. The person concerned must submit a request to that effect.

9.2. A request as referred to in this article will be complied with within four weeks of receipt of the request.

9.3. The right of access is only granted to the data subject or his authorized representative. The person concerned or his authorized representative must be able to identify himself.

9.4. The responsible party may refuse to comply with a request referred to in this article insofar as this is necessary in the interests of protecting the rights and freedoms of others, the prevention, detection and prosecution of criminal offenses.

9.5. A fee may be charged for the provision and sending of copies. The amount of this compensation is laid down in the WBP Cost Compensation Rights Decree. It can be found in Appendix 1.

ARTICLE 10. ADDITION, CORRECTION OR DELETE OF RECORDED DATA

10.1. If requested, the recorded data will be supplemented with a statement issued by the person concerned regarding the recorded data.

10.2. If the data recorded is factually incorrect, incomplete or irrelevant for the processing, or if it conflicts with a statutory regulation of the processing, the data subject must submit a written request to the controller requesting correction, addition, deletion or blocking of the data. The controller does not decide until the officer who collected the data or his successor or deputy has been heard.

10.3. Within four weeks of receipt of the request, the responsible party will inform the applicant in writing whether or to what extent the request will be complied with. A refusal shall be addressed with the reason.

10.4. Removal will not take place insofar as storage is required by law.

10.5. The responsible party ensures that a decision to supplement, correct or delete is carried out as soon as possible.

10.6. In the event of deletion of data, a statement will be included in the data that the data has been deleted at the request of the data subjects.

ARTICLE 11. WEBSITE

11.1. Personal data on the website of the institution or establishment will only be provided to those, including third parties, who:

- are in charge of the above under article 3.1. listed activities, or
- managing the above under article 3.1. listed activities, or
- are necessarily involved in the above under Article 3.1. listed activities.

others if:

- the student has given explicit permission for the data processing, or
- the data processing is necessary for the fulfillment of a legal obligation by the educational institute, or
- the data processing is crucial because of a vital interest of the student (for example, a urgent medical need), or
- the data is further processed for historical, statistical or scientific purposes.

This is under the condition that the educational institution makes sure the data is only available for this specific purposes are further processed.

ARTICLE 12. RIGHT OF OBJECTION

12.1. If data are processed in connection with the negotiation or conservation of a direct relationship between the accountable party or a third party and the concerned party with the purpose of recruitment for commercial or charitable purposes, the data subject must have given explicit consent to this processing. The party concerned can object to this free of charge through the responsible person.

12.2. In the event of opposition, the responsible party will take measures to immediately terminate this form of processing.

ARTICLE 13. RESERVATION TERMS

13.1. Personal data will not be kept in a form that allows the identification of the data subject for longer than is necessary for the realization of the goals for which they are collected or subsequently processed.

13.2. After that, the termination of the agreement is established with the client, all data and/or data that can be traced back to the natural person will be deleted two years after the client's supervision has ended. The data that is necessary for the legal retention obligation will be kept for seven years.

13.3. The data on the website will be deleted directly if so, is requested by the data subject or their legal representative.

ARTICLE 14. COMPLAINTS

14.1. If the concerned party is of the opinion that the provisions of these regulations are not being complied with or if he has other reasons to complain, he should contact the responsible party.

14.2. The responsible party will handle the complaint in accordance with the related complaints regulations.

Distance learning is provided during the corona period. To organize this, **Blik op werk** asks to:

- a screenshot of the activity within distance learning (digital environment) or a virtual classroom,
- A screenshot of a conference call or of a group conversation with the students on Skype, as attendance sheet,
- A screenshot at the end of the lesson as a control tool.

These supporting documents from the organization of education are only used for this purpose and are destroyed once it has been checked.

The Hague, April 2020

These regulations are published on the website and provided to customers and/or clients on request. Employees are provided with these regulations as an appendix to the assignment/employment contract.

APPENDIX 1. DECISION COST REIMBURSEMENT RIGHTS CONCERNED WBP

The party concerned can submit a request to the party responsible at Foxtaal to inform him or her whether personal data is being processed, and if so which. The fee for the costs of this request amounts to: € 0.23 per page with a maximum amount of € 4.50 per request. If the data is provided in a way other than on paper, the responsible party may charge a reasonable fee, provided that this does not exceed € 4.50.

It is allowed to deviate from this rule by charging a maximum fee of € 22.50 if the copy consists of more than one hundred pages or if the message is very difficult to obtain and takes a disproportionate amount of time due to the nature of processing. For example, parts of data are still housed in an old information system, the data is only available via back-up procedures. In short, there must be a disproportionate effort.

The responsible party may charge a reasonable fee for the costs of processing an objection, as referred to in Article 10 of the privacy regulations, assuming that this does not exceed € 4.50.