



## Privacy Regulations

We respect your privacy. Our organization strives towards the best possible safeguarding of your privacy. We will treat the information that you supply to us with confidentiality. We comply with the applicable laws and legislation pertaining to privacy when processing personal information. In these privacy regulations we inform you about the method we use when handling your information.

### Scope of application

This privacy policy applies to Kompas Groep B.V. and its operating company PMT Kompas Management Consultancy B.V.

### Categories of personal data

If you are involved in one or more of our initiatives and/or projects, then you will leave certain information with us. This may include personal information. We solely use and store personal data which is specified by you directly or of which it is clear by statement that it is provided to us to be processed.

We can collect the following information:

- Name
- Address
- Location
- Telephone number
- Email address
- Financial information

### Basis for data processing

We are only allowed to process your personal data if we do so on a so-called legal basis.

In order to process your name, address, residence and contact information, we will ask for your permission; you will find this principle in article 6, paragraph 1 under a of the General Data Protection Regulation (GDPR).

We could also have an agreement with you for our services; in that case, the performance of this agreement is the legal basis according to article 6, paragraph 1 sub b GDPR.

If we wish to process your data for marketing & communication purposes, we ask for your consent; we will do so in accordance with Article 6, paragraph 1 sub a GDPR. A justified interest in marketing & communication purposes provides another basis; in that case article 6, clause 1 subsection f GTC applies.

In the event of processing your data for sales purposes, the legal basis is article 6, clause 1 subsection f GDPR.

We process your financial data to execute the agreement which exists between us and you (for example, if you are a donor); this principle can be found in article 6, paragraph 1 under b of the GDPR.

For the processing of your application data, we first ask you for permission; you will find this basis in article 6, paragraph 1 sub a GDPR.

Without your information we are unable to inform you about our organization or to involve you in one or more of our initiatives and/or projects.

### **Sources**

We receive your personal information from you and third parties with whom we collaborate.

### **Purposes of the information processing**

The personal information which is collected by us, is used for the following purposes:

- Information provision about our activities,
- Accounting,
- Processing your donations, and
- Processing our donations to you or others.

### **Access to personal data**

Within our organization, we apply the following principles regarding access to personal data:

- Only employees have access to personal data to the extent necessary for the proper performance of their duties.
- Authorisations for information systems shall be granted only to officials in job groups to whom access is necessary pursuant to the performance of their duties. An authorisation matrix specifies the authorisations up to the level of the type of rights: none, reading, editing.
- Third parties hired or otherwise appointed by Kompas Groep to perform work have access to personal data to the extent necessary for the proper performance of their duties and are contractually bound to secrecy.
- Electronic (medical) personal data shall be secured in such a way that unauthorised persons cannot gain access to these data.

### **Provision of your personal data to third parties**

Personal data shall only be provided to a third party when required by a statutory requirement or with the consent of the registered person or his authorized representative, or if the data processing is necessary to protect the legitimate interests of the third party to whom the data is provided.

### **Retention periods**

We will not retain personal data for longer than is necessary for the purposes described above, unless required by law, which provision will be observed by us.

If we have concluded an agreement with you, then we will save your information as long as prescribed by law; normally, this is 7 years. If we have not concluded an agreement with you, then we will save your contact information as long as we have a justified interest in doing so, and as long as you do not object to this.

The standard retention period for application data is 4 weeks after the end of the application procedure. If you agree to keep the data for a longer period, it will be kept for a maximum of 1 year after the end of the application procedure.

For the retention of complaints, we apply a term of 2 years after the complaint has been completed.

### **Data Protection Officer**

We have not appointed a Data Protection Officer. A Data Protection Officer (DPO) is mandatory according to article 37 of the General Data Protection Regulation (GDPR) if the organization:

- Is a governmental institution or government agency (except in case of judicial authorities when exercising their judicial duties),
- Is primarily charged with processing which, due to their nature, size and/or their purposes, requires regular and systematic observation at a large scale from the involved parties,
- Is primarily charged with large-scale processing of special categories of personal information.

These criteria do not apply to us.

### **Your rights**

When we process personal data about you, you have various rights which you can exercise. For example, you have the right to access, rectify and delete your data. You can also request us to transfer data to you or another party or to limit the data processing. In addition, you are free to object against processing of your information. You can submit your request to us by email at [consultancy@kompasgroep.com](mailto:consultancy@kompasgroep.com). We strive to respond to your request within 14 working days.

### **Filing a complaint**

In the unlikely event you might not be satisfied with our way of handling your personal data, your complaint can be submitted. With respect to this, we refer you to our complaints regulations on our website. You also have the option of submitting a complaint to the Personal Data Authority. Contact details of the Authority Personal Data can be found here:

<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>.

### **Amendments to this privacy policy**

We reserve the right to amend this privacy policy. All changes will be announced on our website. We therefore advise you to consult our website regularly so that you are aware of any changes.

The original privacy document is written in Dutch and has been translated into English. While it is intended both versions are identical, the possibility of any discrepancies between the Dutch version and English version might appear. In any case, the Dutch version of the privacy policy will dominate.

### **Automated decision-making**

We do not use your personal information to in any way make automated decisions regarding your treatment. This means there is no automated decision-making as referred to in article 22 of the GDPR.

### **Our contact details**

The formal controller is:

PMT Kompas Groep B.V.  
Folkert Elsingastraat 38  
3067 NW Rotterdam

For all your questions and comments regarding privacy and the protection of your personal information in our organization you can reach us by telephone at +31-10-2660876 or by email at [consultancy@kompasgroep.com](mailto:consultancy@kompasgroep.com).

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