



PRIVACY STATEMENT

WHO ARE WE

This is the privacy statement of Partou¹, located at Sportlaan 1, 4131 NN Vianen.

As the controller, we handle the data of our customers and their children, members of staff and applicants with care. We adhere to the General Data Protection Regulation (GDPR) and ensure that:

- All personal data is processed and stored in a careful and secure manner.
- No more personal data is recorded than necessary.
- Personal data can be processed only by persons who are required to do so with a view to the fulfilment of their jobs.
- If processing is carried out by a third party (processor), this is on the basis of a concluded processing agreement or on the basis of agreements on careful exchange of personal data.

We would like to refer you to the processing of data on our website by means of cookies to our cookie statement.

PRIVACY OFFICER/DPO

Because your privacy is important to us, we have appointed a Privacy Officer and a Data Protection Officer. The Data Protection Officer is our external and independent supervisor who can be reached via fg@partou.nl. The Privacy Officer's task is focused on implementation and can be reached via privacy@partou.nl.

I. CUSTOMER INFORMATION

In this privacy statement, we use the term customer or parent. This refers to the child's parent or carer who has parental control of any child under the age of 16 and who signed the childcare contract with Partou (hereinafter referred to as the contract). Partou assumes that this parent will coordinate any requests ensuing from this privacy statement with the other parent (not being the contracting parent).

A parent or carer who does not have concluded a contract with Partou can, if he or she wishes to exercise the rights set out in this privacy statement, do so in coordination with the contracting parent.

WHAT DATA DO WE RECORD AND FOR WHAT PURPOSES?

In order to provide good childcare in accordance with the contract we conclude with you, we need all kinds of personal data from you and your child. This concerns data required for:

- providing information about our services (also to potential customers)
- placing children on the waiting list
- invoicing
- the care, supervision and development of your child
- maintaining contact with you as a parent
- applying for subsidies/allowances

¹ Since 2020, Smallsteps B.V. and Partou B.V. have formed one new organisation: the new Partou.



- Legitimate business processes and activities, including generating management information and reports, conducting market analyses, data analyses, maintaining statistics and internal audits.

Registration of the citizen service number

Partou has a statutory obligation to register and check the citizen service number (BSN) of parents and children to exchange data with the Tax and Customs Administration.

The special personal data we process

Medical details and other child-related particulars

To guarantee the quality of our childcare services, the educational staff register medical data and other child-related particulars, such as any allergies and dietary data, in a paper child file and in the secure parent portal.

Photos and/or videos

We regularly take photos or make videos of the children. The basic principle is that children are not recognisable in these photos or videos unless the parent has given explicit permission for that in writing.

We use the photo and videos for the following purposes:

- to show parents what their child has experienced with us during the day. We share these images via our secure parent portal to which only members of staff and parents have access. We have drawn up a [supplementary privacy statement](#) specifically for the use of this parent portal.
- for newsletters to parents.
- for internal staff training purposes.
- to show potential customers on our website and in other external communications (including Facebook, LinkedIn, Twitter) what activities we offer the children.

HOW LONG IS YOUR PERSONAL DATA KEPT?

Your personal data and that of your child are kept in accordance with the laws and regulations and for as long as necessary for the purposes for which this data has been recorded.

We store contractual data, financial data and any complaints for seven years. The contractual data also includes the first name/initials, surname, date of birth and the citizen service number of you and your child.

The paper child file at the branch will be destroyed immediately after the end of the contract. Documents relating to the recording of a reporting code process are kept for two years.

DO WE SHARE YOUR DATA WITH OTHERS?

We only provide your data and that of your child to third parties if this is necessary in the interest of your child, if this is permitted in the context of the performance of the contract, insofar as we have a legitimate (business) interest or if this is required by law.

In all other cases, data is disclosed to third parties only with your unambiguous consent. For instance, with the parents' written consent, we exchange data with other care institutions or schools in the interest of your child's care.

We provide data on a statutory basis to:

- The Tax and Customs Administration, in relation to the childcare allowance. It only concerns data required by the Tax and Customs Administration (name, address, citizen service number of the child and the paying parent, childcare hours purchased).



- The municipal health service (GGD), in the context of the monitoring task within the Childcare Act. It only concerns details required to determine the assistant to child ratio (the child's name and date of birth). The supervisor of the municipal health service has a duty of confidentiality based on his/her position.
- To local authorities about the use of pre-education and early education, to account for the subsidy received for this. We only disclose such information insofar as such is stipulated as an obligation in a municipal regulation.

We provide data to the extent necessary for a legitimate (business) interest that we have, namely:

- (external) audits, business transactions (partnership, purchase/sale) and promoting company safety. Confidentiality is observed in the implementation thereof.
- for Partou marketing purposes with third parties. For example, your email address can be shared in pseudonymised form with online marketing companies such as Google and Facebook. If you are known to these companies and your advertising settings on their [platforms allow this](#), Partou can show you targeted advertisements or exclude you from advertisements via these channels. Opt-out for this is possible via an email to communicatie@partou.nl.

Veilig Thuis - for the sake of your child

We have a duty to always talk to you as a parent if we have concerns about your child. If the concerns are serious to such an extent that they cannot be removed during a consultation with you as a parent, we will have to report the matter to Veilig Thuis. Of course, we will notify you of this **in advance**. In principle, we do not report anonymously to Veilig Thuis unless the children's safety or that of members of staff is jeopardised.

CUSTOMER IDENTIFICATION

There are potential situations in which the educational professional will be unable to establish if the adult in question is, indeed, authorised to collect a child from a branch. Examples include a situation in which an educational professional has not yet met the parent in question or the person collecting the child has never been to the branch before (a grandfather, grandmother, uncle, aunt or neighbour, for example). The educational professional is entitled to ask that person to prove his identity. This is done after trying other options, such as asking a colleague or calling the parents.

Government policy requires us to register the citizen service numbers of customers and children. During the intake interview, educational professionals or the branch managers check the numbers held on our records against the proofs of ID of the parents or the letter from the social insurance bank in which a citizen service number is assigned to the child.

I. APPLICANT INFORMATION

APPLICANTS

If you apply for a job with us, we need information from you, including various personal data, such as your name, date of birth, address details and information about your training and experience.

We use your personal data to make a comparison with other candidates and to weigh up your competencies and skills required for the vacancy.

We do not keep your data for longer than four weeks after the procedure has ended. This enables us to still approach you if the previous candidate turns out to be unsuitable after all. If you have given permission to keep your data for longer, we will keep it for a maximum of one year after the application procedure has ended. The details will never be forwarded to third parties.

If you join us after the application procedure has ended, the data that was part of the application procedure will be included in the personnel file.

II. DETAILS OF MEMBERS OF STAFF



We handle personal data received with great care and apply the following principles as formulated by the Dutch Data Protection Authority:

- Details of members of staff are processed only for permitted and/or statutory purposes, processing for the performance of the employment contract, such as salary payment, training, medical assistance, the execution or implementation of laws and regulations that apply to the employment contract.
- Only categories of data permitted and/or compulsory by law are processed such as name, address, place of residence, bank account number, details about training followed or to be followed, position, attendance (in connection with salary payment, leave registration, etc.) or data that must be processed under the laws and regulations.
- Data is disclosed only to those charged with the performance of the employment contract, with the management of the member of staff or with those who are otherwise necessarily involved.
- The data is disclosed to third parties only with the member of staff's unambiguous consent or if this is required to fulfil a statutory duty.
- The member of staff's details are removed after no more than two years after the end of his employment or activities unless the termination of employment was the result of an industrial dispute. In that case, the retention period is 10 years. Some of a member of staff's details are kept longer only insofar as this is needed to fulfil the statutory retention duty that applies to that part and never more than that term. Such a need exists, for instance, when a member of staff leaves the company whilst ill or when a member of staff is unfit for work for a prolonged period.

III. OTHER

HOW DO WE PROTECT PERSONAL DATA?

We have taken various technical and organisational measures to reduce the chances of unauthorised persons gaining illegal access or obtaining person details unlawfully to a minimum. The measures are appropriate for the risks and the nature of the data, they are checked regularly and verified against the current status of available technologies and they are adjusted, if necessary. In addition, Partou is ISO27001 certified.

Every member of staff has a responsibility to keep the details of children, parents and members of staff secure. To that end, internal work instructions and guidelines were drawn up and these are monitored.

We use secure computer programs, servers and connections for digital data processing and it is recorded how access to information is obtained and which officer has access to which information.

ACCESS, INSPECTION AND MODIFICATION OF DATA – RIGHT OF THE DATA SUBJECT

Under the GDPR, customers, members of staff or other customers have a right to inspect, correct, supplement, restrict, remove and to receive their personal details in such a way that the details can simply be forwarded to another organisation. In the latter case, it only concerns digital data we process with the data subject's consent or that are intended to perform the agreement concluded with him/her.

A request to have personal data corrected or removed can be made if the data is factually incorrect, not necessary to achieve the goal, if it violates a statutory regulation or if the data subject in question no longer wants Partou to use his details. The latter is possible only if Partou no longer needs the details in question for the performance of the (employment) contract and if there is no statutory data retention period that has not expired yet.

If data cannot be removed, Partou will explain why and after how long the data will be automatically destroyed or anonymised (if complete removal is not possible).

If you want to exercise one of these rights, you can let us know via privacy@partou.nl.

PERSONAL DATA OUTSIDE THE EU

Partou's starting point is to process personal data within the EEA as much as possible. It is possible that personal data is processed outside the EEA, including at locations that are not subject to an adequacy decision by the



European Commission. Partou ensures that the processor of the personal data offers an adequate level of protection, for example, by concluding the correct agreements, if necessary, Standard Contractual Clauses or an alternative data transfer mechanism as approved by the European Commission.

COMPLAINTS AND QUESTIONS

We are committed to guarding your privacy as well as possible. If you do not agree with our use of your personal data or that of your child, or if you have any questions, please contact us via privacy@partou.nl.

It is also possible to contact Partou's Data Protection Officer directly via fg@partou.nl. The Data Protection Officer is our external independent supervisor in the field of privacy and data processing.

Customers, members of staff and job applicants also have the right to submit a complaint about the processing of their personal data or that of their child to the [Dutch Data Protection Authority](#)

About this privacy statement

This privacy statement is the property of Partou. This statement can be amended. We will do so if the law or our policy changes. The most current version of this statement can be found on the website.

The most recent change was made on 20 June 2023.