



PRIVACY STATEMENT

WHO ARE WE

This is the privacy statement of Partou¹, located at Sportlaan 1, 4131 NN Vianen in the Netherlands. As the Controller, we handle the data of our customers and their children, employees and job applicants with care. In doing so, we comply with the General Data Protection Regulation (GDPR), and ensure that:

- All personal data is processed and stored carefully and securely.
- Only necessary personal data is collected.
- Processing of personal data is only permitted by persons who need to do so for the performance of their duties.
- If processing is carried out by a third party (processor), this will be carried out based on a data processor agreement entered into or on agreements regarding careful exchange of personal data.

For processing of data on our website by means of cookies, please refer to our cookie statement.

PRIVACY OFFICER/DPO

Because we value your privacy, we have appointed a Privacy Officer and a Data Protection Officer. The Data Protection Officer ensures that we comply with the privacy regulations. The Privacy Officer and Data Protection Officer can be contacted at privacy@partou.nl.

I. CUSTOMER DATA

In this privacy statement, we use the terms customer and parent. This refers to the parent or guardian of the child who has custody of the child aged under 16 and has signed the childcare contract with Partou (hereinafter referred to as: the contract). Partou assumes that this parent will discuss any requests arising from this privacy statement with the other parent (not being a contract parent).

The parent or guardian who does not have a contract with Partou may, if he/she wishes to exercise the rights set out in this privacy statement, do so in consultation with the contract parent.

WHAT DATA DO WE RECORD AND FOR WHAT PURPOSES?

To be able to offer proper care in accordance with the contract we have entered into with you, we need various types of personal data from you and your child. This concerns data necessary for:

- providing information about our services (including to potential clients)
- 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/benefits

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



- Legitimate business processes and activities, including generating management information and reports, carrying out market analyses, data analyses, keeping statistics and internal audits.

Special personal data we process

BSN registration

Partou is legally required to register and verify the BSN number of parents and children for information exchange with the Tax and Customs Administration.

Medical data and other child-specific details

To guarantee the quality of our childcare service, the pedagogical staff members register medical information and other child-specific details, such as any allergies and dietary information, in a paper child file and in the secure parent portal.

Photo and/or film images

We regularly take photo and/or film images of the children. The guiding principle is that children cannot be identified in the images, unless the parent has given explicit written permission.

We use the photo and film images for the following purposes:

- to show parents what their child has experienced during their day with us. We share these images through our secure parent portal, which can only be accessed by staff and parents. We have drawn up an [additional 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 WILL YOUR DATA BE KEPT?

Your personal data and that of your child will be kept in accordance with applicable laws and regulations and for as long as is necessary for the purposes for which this data have been collected.

We keep contractual data, financial data and any complaints for a period of 7 years. Contractual data includes the first name/ initials, surname, date of birth and BSN number of you and your child.

The paper child file at the location is destroyed immediately after the end of the contract. Documents relating to recording of a reporting code process are kept for a period of 2 years.

DO WE SHARE YOUR DATA WITH OTHERS?

We will only share your and your child's data with third parties if this is necessary in the interest of your child, if it is permitted within the scope of the performance of the contract, if we have a legitimate (business) interest or if we are legally required to do so.

In all other cases, data is only shared with third parties with your unambiguous consent. For example, we exchange data with other healthcare institutions or schools in the interest of your child's care after receiving written consent from parents.



We provide data on a legal basis to:

- The Tax and Customs Administration, in the context of childcare benefits. This concerns only the data required by the Tax and Customs Administration (name, address, BSN child and paying parent, hours of childcare purchased).
- The GGD (Municipal Health Service), as part of its monitoring role within the scope of the Childcare Act. It only concerns data necessary to determine the professional-child ratio (name and date of birth of the child). The GGD supervisor has a duty of confidentiality on account of his/her position.
- To municipalities, with respect to the use of pre-school and early childhood education, in order to account for any subsidy received. We only provide the data that is required by a municipal regulation.

We provide data where necessary for our legitimate (business) interest, namely:

:

- External audits, auditing, business transactions (partnership, purchase/sale) and the promotion of occupational safety. Confidentiality will be maintained in these cases.

Veilig Thuis - in the interest of your child

We have a duty to contact you, as a parent, in the event we have concerns about your child. If the concerns are of such a serious nature that they cannot be resolved in discussion with you as a parent, we may be forced to submit a report to Veilig Thuis (Counselling and support centre for domestic violence and child abuse). Obviously, we will inform you accordingly **beforehand**. In principle, we do not submit an anonymous report to Veilig Thuis, unless it is a safety issue for the children or staff members.

CUSTOMER IDENTIFICATION

There are situations in which the pedagogical staff member cannot establish whether the adult involved is indeed authorised to collect a child from a location. Consider a situation in which the pedagogical staff member has not yet met the parent involved, or the person collecting the child has never been at the location before (for example grandpa, grandma, uncle, aunt, neighbour). The pedagogical staff member has the right to ask the person to identify themselves. This is done after other possibilities have been considered. Other possibilities include consultation with a colleague or contacting the parents by telephone.

Government policy requires us to register the BSN number of customers and children. During the intake interview, pedagogical staff members or location managers check the numbers registered with us against the identity documents of the parent(s) or the letter from the Social Insurance Bank issuing the BSN number to the child.

II. DATA OF EMPLOYEES AND JOB APPLICANTS

EMPLOYEES

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

- Employee data will only be processed for permitted and/or legally required purposes for the performance of the employment contract, such as salary payment, training, company medical counselling, the implementation or application of the laws and regulations applicable to the employment contract.
- Only the legally permitted and/or obligatory data categories are processed, such as name, address, place of residence, bank account number, data relating to training followed or to be followed, position, attendance (in connection with payment of salary, leave registration, etc.) or data that must be processed when required by laws and regulations.
- The data will only be provided to those who are responsible for the performance of the employment contract, for supervising the employee or are otherwise necessarily involved.



- The data will only be provided to third parties if the employee has given his unambiguous consent or if this is required for the fulfilment of a legal obligation.
- The employee's data will be deleted no later than two years after the employment relationship has ended or the employee's activities have been terminated, unless there is a labour dispute upon leaving the company. In that case a retention period of 10 years applies. Retaining parts of an employee's data for longer only occurs to the extent necessary to comply with a statutory retention obligation applicable to that part and shall never exceed that period. Such a necessity exists, for example, in the event of sick leave or long-term incapacity for work of the employee.

JOB APPLICANTS

We will keep your details for no longer than 4 weeks after the job application process has been closed. This allows us to contact you if the previous candidate turns out not to be suitable. If you have given us permission to keep your details for a longer period, we will keep them for a maximum period of one year after conclusion of the application process. The data will never be disclosed to third parties.

If you take up employment with us after conclusion of the application process, the data that was part of the application process will be included in the personnel file.

III. OTHER

HOW DO WE PROTECT YOUR PERSONAL DATA?

We have implemented various technical and organisational measures to minimise the risk of an unauthorised person gaining access to or unlawfully obtaining personal data. The measures taken are appropriate to the risks and nature of the data, are regularly checked and tested against the current state of available technology and adjusted where necessary.

Every employee has the responsibility to keep the data of children, parents and employees secure. To this end, internal work instructions and guidelines have been drawn up, which are monitored.

For digital data processing we use secured computer programmes, servers and connections and it is laid down how access to information is obtained and which officer has access to which information.

ACCESS, INSPECT AND RECTIFY DATA - RIGHTS OF THE DATA SUBJECT

In accordance with the GDPR, customers, employees or other clients have the right, to access, rectify, supplement, restrict, delete and receive their data in such a way that it can be easily transferred to another organisation. In the last case, it only concerns digital data that we process with the consent of the data subject or that is intended for the performance of the agreement with him/her.

Rectification or deletion may be requested if the data is factually incorrect, is not needed for the purpose for which it was collected, if the data is processed in violation of a statutory requirement or if the data subject no longer wishes to give Partou permission to use his/her data. The last-mentioned case is only possible if Partou no longer requires the relevant data for the performance of the contract or employment contract and if there is no statutory retention period for the data that has not yet expired.

If data cannot be deleted, Partou will state why this is not possible and provide you with information regarding the period after which the data will be automatically destroyed or anonymised (if complete deletion is not possible).

If you wish to exercise any of these rights, please contact us on privacy@partou.nl.



PERSONAL DATA OUTSIDE THE EU

Our principle is to process personal data only within the EU. For example, your data will not be stored or used outside the EU, even if this contributed to proper care. In doing so, we take into account current Dutch and European laws and regulations.

COMPLAINTS AND QUESTIONS

We make every effort to protect your privacy. However, 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 on privacy@partou.nl.

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