

## Privacy Statement Aletrino Coaching

In providing our services in the coaching practice, we process your personal data. To inform you how we handle your personal data we have drawn up this privacy statement.

### Contact details of the party responsible for processing

Personal data are processed by:

**Aletrino Coaching**  
**Wendelien Aletrino**  
Sweelinckplein 1  
2519 GK Den Haag  
+316-26074279  
[info@aletrino.com](mailto:info@aletrino.com)  
KvK 27287938

### Acquisition of personal data

If you make use of our services, you provide us with your personal data in order to be able to provide these services to you. This can be for example during a conversation, via our website, by email, by telephone or in any other way. It is also possible that we obtain your personal data from third parties within the process of coaching.

### Personal data

Aletrino Coaching processes the following categories of personal data:

- Name and address details
- Contact details, such as e-mail address and telephone numbers
- Date and place of birth
- Work experience
- Competencies and areas of interest
- Learning goals, expectations, reflection reports, interview duration
- Coach context related data such as e.g. name of partner, children, manager, colleague
- Conversation reports
- Communication content

### Purposes

Aletrino Coaching processes personal data for various purposes, such as:

- Maintaining contact;
- Offering a personal coaching trajectory;
- Providing a good and efficient service;
- Managing the client database and billing;
- Performing administrative activities, such as planning;
- Improving the services provided;

- Reporting and analysing for accountability to clients and improvement of services;
- Collecting payments and taking collection measures;
- Marketing;
- Fulfilment of legal obligations;
- Resolving disputes;

**What the processing is based on**

Your personal data are processed in order to execute the agreement with you regarding the coaching process. Your personal data can also be processed to comply with a legal obligation, such as obligations based on tax law.

If personal details are processed on the basis of permission, this will be requested separately.

**Provision to third parties**

Personal data may be provided to third parties as part of our services. For the aforementioned purposes, we may make use of the services of third parties, such as our IT suppliers, test agencies or other third parties who are involved in the coaching process. These third parties may also only process your personal data for the aforementioned purposes. Your personal data could also be provided in the context of a legal obligation or court order.

We will not provide your data for commercial or charitable purposes.

**Transfer of your data outside the EEA**

The EEA is the European Economic Area, consisting of the countries of the European Union, Liechtenstein, Norway and Iceland. Your personal data is processed within the EEA by our cloud provider based in the Netherlands.

In addition, your data may be stored by third parties outside the EU when using Google Analytics, Google Mail or LinkedIn, Whatsapp or Facebook in the contact with you. These parties are "EU-US Privacy Shield" certified, so they will comply with European privacy regulations.

**How long we keep your data**

Your personal data will not be kept longer than necessary for the purposes stated in this privacy statement. This means that your personal data will be kept for as long as it is necessary to achieve the relevant purposes.

Certain data must be retained for longer because we must comply with legal retention obligations, such as the tax retention obligation or to be able to demonstrate the coaching hours completed for (re)certification by professional associations such as NOBCO.

**How we secure your data**

We consider it important that your personal data is protected against loss or unauthorised access. We have therefore taken appropriate security measures. These include two-step authentication, encrypted passwords with more than 12 characters and exclusive access to servers from predetermined IP addresses.

### **Profiling**

We combine the personal data from various sources such as the website, our conversations, etc. in order to provide you with personalised offers and information.

### **Cookies**

Only functional cookies are used on the website to improve the online service. Cookies are used to process your IP address and the system information of your device.

### **Your rights**

You have the right to make a request to see your personal data. Upon receipt of your request, you will receive an overview of your personal data within 1 month. If this reveals any inaccuracies, you can request that your details be amended, supplemented, removed or blocked.

You can also request us to transfer your personal data or you can object to the processing of your personal data because of special personal circumstances.

Questions about this privacy statement or a request about the processing of your personal data can be sent to:

### **Aletrino Coaching**

#### **Attn. Wendelien Aletrino**

Sweelinckplein 1  
2519 GK The Hague  
+31(0)6-26074279  
info@aletrino.com

If you have a complaint about the processing of your personal data, please let us know. If you are unable to resolve the matter with us, you have the right to make a complaint with the privacy supervisor, the Netherlands Data Protection Authority. You can contact the Personal Data Authority for this purpose.

### **Amendments to privacy statement**

We can amend this privacy statement. New versions are always published on the website. We therefore recommend that you consult this declaration regularly, so that you remain aware of any changes.

This privacy statement was last amended on 26 August 2022.