

The General Data Protection Regulation, hereinafter GDPR, has been applicable since 25 May 2018. This privacy law applies to all companies and organizations that record the personal data of customers, staff or other persons from the EU.

This is the privacy statement of Disem Institute BV, hereinafter Disem Institute. In it, Disem Institute explains, among other things, the reason behind its collection and use of personal data, the kind of data these are and the rights you have in case Disem Institute processes your personal data.

### **Processing of personal data by Disem Institute**

Disem Institute considers your privacy important. That is the reason it protects your data. Disem Institute treats this information confidentially and in accordance with the GDPR. In this way, Disem Institute guarantees your privacy. This involves recording and providing your data.

### **Which personal data does Disem Institute process?**

Disem Institute processes personal data provided by means of the registration or contact form via its website as well as written registrations or correspondence conducted otherwise. This concerns the following data:

1. Name of the client / company / institution / legal entity
2. Given name(s), surname and function
3. Business correspondence address / postal code / house number / city / country
4. Business e-mail address / business phone number
5. Payment information

### **General privacy protection principles**

Disem Institute will protect your privacy as well as possible. It uses the general principles of privacy protection with regard to the following:

- 1. Personal data**  
Disem Institute collects the personal data it needs for its business operations.
- 2. Care**  
Disem Institute treats personal data carefully. It is only made available for appropriate business operations. The personal data is stored securely in accordance with the current digital security requirements. Disem Institute protects personal data according to a fixed protocol.
- 3. Transparency**  
Disem Institute is transparent regarding its processing of personal data. In other words, it explains the way it processes data and the reason for it in accordance with its privacy statement. Disem Institute also explains the way it handles your personal data on its website.

### **Purposes of the processing**

According to the GDPR, Disem Institute may only process personal data for specified purposes, such as the following:

1. Administrative organization and internal control
2. Financial administration, collection of debts and payment to creditors
3. Compliance with legal (fiscal) obligations with regard to the administration and retention obligation
4. Courses, other forms of education, training, presentations, seminars, workshops, advice, coaching, interventions, business analyses, strategic security provision, business cases, strategic step-by-step plans, decision-making support and so on
5. Statistical processing (with anonymized data)
6. Reply to customer contacts, newsletters and questions from customers
7. Dissemination of information on new products and services
8. Dispute resolution and auditing

**Legal grounds**

The GDPR also prescribes that every processing should have a legal basis. The processing is only lawful if and insofar as at least one of the following conditions is met:

1. Your consent
2. Necessity of processing data in order to execute an agreement that Disem Institute has concluded with you or to take measures at your request before concluding the agreement
3. Compliance with legal obligations that rest on Disem Institute
4. Protection of the vital interests of yourself or others
5. Necessity of processing data in public interest or in the context of public authority—for example, the national criminal investigation department or the police
6. Representation of the interests of Disem Institute, someone else, or another organization, which concerns legitimate interests

**Mandatory provision**

If Disem Institute asks for personal data, it will state whether this is necessary or mandatory. The (possible) consequences in case you do not provide the data will also be explained. The starting point is always that Disem Institute only collects the personal data it requires.

**Security of personal data**

Disem Institute takes the appropriate measures to protect personal data against loss and unlawful processing. Thanks to encryption technologies, encrypted communication and treatment of the data are confidential. People who have access to your data on behalf of Disem Institute must keep it secret.

**Who can view the data?**

The data can be viewed by employees of Disem Institute and third parties hired by Disem Institute who need access to the data in order to perform certain administrative, organizational or technical implementation tasks—for example, financial administration, planning of workshops, scheduling and adequate handling of correspondence.

**What are your rights?**

The GDPR gives you various rights when it comes to your personal data. You can exercise your rights by submitting a request to Disem Institute (refer to the bottom of this privacy statement).

**Right to inspect**

You have the right to inspect the personal data that Disem Institute processes.

**Right to correct and delete**

If the personal data is incorrect, you have the right to have the data changed or deleted. This is also possible if the processing is no longer justified.

**Right to object**

You can object to the processing of certain personal data. You have this right for all processing that is not based on the following:

1. Your consent
2. Execution of an agreement that Disem Institute has concluded with you or adoption of measures in advance (at your request) before the agreement is in place
3. Compliance with legal obligations or protection of the vital interests of yourself or others.

**Right to restrict**

In certain cases, you have the right to have Disem Institute restrict the processing of your data. If you invoke this right, Disem Institute will temporarily freeze the processing of the data. You can do this in three situations:

1. If you have submitted a request for the correction of your data and are awaiting the assessment of that request. The data may need to be deleted while you wait. But if you do not want that, Disem Institute can temporarily freeze the data.
2. If Disem Institute no longer needs the data, but you still need the data in connection with preparations for a lawsuit.
3. If you are awaiting the assessment of an objection.

**Right to withdraw consent**

You can always withdraw your consent. Disem Institute will then stop processing your data or will completely anonymize it. If you withdraw your consent, it has no retroactive effect. All the processing that has already taken place remains legal.

**Exercise of rights**

Exercising your rights is free of charge for you, unless you abuse the rights. If you wish to exercise your rights, please contact us via our website, listed at the bottom of this statement.

**Terms**

In principle, Disem Institute will answer your questions and requests within one month. If it takes longer to answer, you will be informed within a month. A request for destruction of data is processed within a maximum period of three months.

**Identification**

If Disem Institute is in contact with you about your personal data, it may ask for proof of your identity. This way, Disem Institute prevents the provision of personal data to the wrong party. This also ensures that Disem Institute does not make incorrect changes to the processing of your personal data.

**Consideration for each request**

The rights described above are not absolute. Due to certain circumstances, Disem Institute may not be able to comply with a particular request. Disem Institute treats each request as a separate case. If it cannot comply with a request, an explanation is provided. If you disagree, you can file a complaint or take the case to court.

**Supervisor**

Do you want to submit a complaint to the supervisory authority, the Dutch Data Protection Authority? That is always possible. You will find the contact details on the website: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

**Questions**

Do you have a question about the processing of your personal data by Disem Institute? Send us an email!

**Change in Disem Institute's privacy statement**

Disem Institute has the right to change this privacy statement. If it does so, it will announce it on its website.

Dutch law applies to this document. The Dutch version of the privacy statement is leading. Disem Institute assumes no responsibility for errors in translation.

**Contact details**

Do you have any questions regarding this privacy statement or the privacy policy? Or do you want to invoke one of your rights? Then contact us via our website.