



## Privacy regulations De Kleine Wereld

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## Definitions

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| <b>Personal data:</b>                | Any data relating to an identified or identifiable natural person.  |
| <b>Processing of personal data :</b> | Any operation or set of operations involving personal data, including in any case the collection, recording, organisation, storage, updating, modification, retrieval, consultation, use, provision by means of transmission, dissemination or any other form of making available, bringing together, linking, as well as blocking, erasure or destruction of data. |
| <b>Special personal data :</b>       | A personal data that says something about someone's religion, belief, race, political affiliation or health.  |
| <b>Data subject:</b>                 | The person to whom a personal data relates whether or not represented by their legal representative. In these regulations, this refers to parents and children.   |
| <b>Legal representative:</b>         | If the person has not yet reached the age of 16 years, the person will be represented by their legal representative. This will usually be a parent but may also be a guardian.  |
| <b>Controller:</b>                   | The controller establishes what personal data are being processed and the purpose of that processing.   |
| <b>Processor:</b>                    | The person who processes personal data on behalf of the Controller, without being subject to his direct authority; The company, institution or supplier who processes personal data on behalf of De Kleine Wereld.  |
| <b>Third Party:</b>                  | Any person, other than the Data Subject, the Controller, the Processor, or any person under the direct authority of the Controller or the Processor is authorised to process personal data.   |
| <b>Childcare:</b>                    | Childcare for children aged 0-4 and 4-13.   |



## Scope and objective

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1. These regulations lay down rules on the processing of personal data of customers (parents and children) of De Kleine Wereld.
2. These regulations apply to all personal data of the data subject processed by De Kleine Wereld. The purpose of these regulations is to:
  - a) protect the privacy of data subjects against wrong and unintended use of personal data;
  - b) identify which personal data are being processed and for what purpose;
  - c) ensure the careful processing of personal data;
  - d) safeguard the rights of data subject.

## Purposes of processing personal data

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When processing personal data, De Kleine Wereld complies with relevant legislation including the General Data Protection Regulation (hereinafter AVG). The processing of personal data takes place for:

- a) providing childcare and related administration and invoicing
- b) the Tax Office regarding linking childcare hours to childcare allowance
- c) handling disputes and conducting audits;
- d) the implementation or application of another law.

## Target binding

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Personal data will be used only insofar as such use is compatible with the defined purposes of the processing. The Small World does not process more data than is necessary to achieve those defined purposes.

## Types of data

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The categories of personal data used by The Little World are listed in Annex 1.

## Basis of processing

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Processing of personal data is done only on the grounds of:

- a) Consent: in case the data subject has given his/her unambiguous consent to the processing.
- b) Contract: in case the data processing is necessary for the performance of a contract to which the data subject is a party, or for taking pre-contractual measures in response to a request from the data subject and necessary for the conclusion of a contract.
- c) Legal obligation: in case the data processing is necessary to fulfil a legal obligation to which De Kleine Wereld is subject.
- d) Vital interest.
- e) Public law task: in case the data processing is necessary for the proper performance of a public law task by the administrative body concerned or the administrative body to which the data is provided.
- f) Legitimate interest.



## Retention periods

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The Small World will not retain data for longer than is necessary to fulfil the purpose for which it was obtained, unless there is another legal obligation that requires the data to be retained for longer. See Annex 2 for an overview of retention periods.

## Access

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The Small World only grants access to the personal data contained in the records and systems of The Small World to:

- a) employees who are entitled by virtue of their position at The Little World;
- b) the Processor authorised to process personal data;
- c) third parties to be granted access by law, with access being granted only to the data to which according to the law must be given access to.

## Security and confidentiality

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- a) The Small World takes appropriate technical and organisational security measures to prevent personal data from being damaged, lost or processed unlawfully. The measures are also aimed at preventing unnecessary collection and further processing of personal data.
- b) The Small World ensures that employees have no more access to or inspection of personal data than is strictly necessary for the proper performance of their work.
- c) Security measures shall take into account the state of the art and the costs of implementation. In doing so, De Kleine Wereld shall take into account the concrete risks that may apply to the personal data processed.
- d) Anyone who is involved in the implementation of these regulations, and in doing so receives access to personal data that are confidential or must be kept secret (such as, for example, healthcare data), and to whom a duty of confidentiality does not already apply by virtue of profession, position or statutory provision, is obliged to keep such personal data thereof confidential.

## Provision of data to third parties

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Where there is a legal obligation to do so, The Little World may provide personal data to third parties. The provision of personal data to third parties may also take place following the consent of the person concerned.

## Social media

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For the use of personal data in social media, separate agreements have been made in De Kleine Wereld's 'code of conduct'.



## Data subjects' rights

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The AVG gives the data subject a number of rights. The Small World recognises these rights and acts in accordance with them.

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| Inspection and transfer                     | Any data subject has the right to access and transfer the personal data processed by De Kleine Wereld that relate to him/her. The Small World may charge a cost of up to €5 for granting this request. If the request is refused, no costs will be charged. The Small World may request<br>To request a valid identity document to verify the applicant's identity. |
| Correction, addition, deletion and blocking | Data subjects may request access, correction, addition, deletion or blocking of their personal data, unless this proves impossible or would require an unreasonable effort.   |
| Resistance                                  | Insofar as De Kleine Wereld uses personal data on the basis of Article 6(e) and (f), the data subject may object to processing of personal data on the basis of his/her personal circumstances.   |
| Term  | Within a period of 4 weeks of receiving a request, De Kleine Wereld must either comply with it in writing or reject it in writing, giving reasons. The Small World may inform the person concerned that more time is needed and extend this period by a maximum of 4 weeks.   |
| Conducting research                         | If the data subject's request is granted, De Kleine Wereld shall ensure that the requested changes are made as soon as possible.  |
| Withdrawal of consent                       | Insofar as prior consent is required for the processing of personal data, such consent may be withdrawn by the legal representative at any time.  |

## Transparency

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1. The Small World informs data subjects about the processing of their personal data. If the type of processing requires it, De Kleine Wereld shall inform each data subject separately about the details of that processing.
2. De Kleine Wereld also informs the data subject -in outline- about the agreements made with third parties and Processors who receive personal data of the data subject.

## Complaints

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1. If you believe that the actions or omissions of De Kleine Wereld are not in accordance with the AVG or as elaborated in these regulations, you should contact the management of De Kleine Wereld.
2. In accordance with the AVG, the data subject can also turn to the courts or the Personal Data Protection Board.

## Unforeseen situations

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If a situation arises that is not described in these regulations, the person in charge will take the necessary measures.



## Amendments to regulations

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These (draft) regulations are adopted by the responsible party after advice from the Parents' Committee. The responsible party shall publish these regulations via the Internet. The responsible party has the right to amend these regulations after the approval of the Parents' Committee.

## Final provisions

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These regulations shall be referred to as "the Privacy Regulations" of De Kleine Wereld and shall enter into force on 15 May 2018.