



# Shared Ambition BV - Privacy Policy

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You can visit and view the Shared Ambition website without telling us who you are or providing us with any information about yourself.

This website keeps a number of web statistics in a completely automated manner. This includes the number of visitors, the number of pages viewed, the type of computer and web browser used to visit the website and links clicked to reach the website. Only technical web statistics are being collected. These web statistics can't be traced back to individual persons. The web statistics will be processed into aggregated information only, in the form of diagrams and summaries. After processing, no detailed web statistics will be kept.

There are a number of situations in which Shared Ambition stores the personal information of a website visitor, for example in order to respond when you want to contact us via our contact page. We store this personal information in an automated system.

Collected (personal) data will not be sold or made available to third parties. This is subject to special circumstances, for example when such is required by law.

## Article 1 – General provisions and definitions

1.1 Unless expressly provided otherwise below, the terms in this Regulation are used in the same sense as provided in the **(Implementation Act) GDPR**.

### 1.2 Personal Data

Any data concerning an identified or identifiable natural person.

### 1.3 The processing of personal data

Any activity or the set of activities relating to personal data, which is or which are used to implement Shared Ambition's service provision.

### 1.4 Controller

The Shared Ambition Management Board.

### 1.5 The data manager of personal data

Those who, under the responsibility of the Shared Ambition Management Board, are tasked with the daily care of the processing of personal details.

### 1.6 User of personal data

Those in the role of employee, processor or otherwise are authorised to use personal data.

### 1.7 Employee

All persons, employed in the organisation of Shared Ambition, based on an employment contract or otherwise.

### 1.8 Data subject

The person whose personal details are recorded.

### 1.9 Client

A natural person or legal entity who has placed an order for services.

### 1.10 Access to personal data

The authorisation of persons, employed in the organisation of Shared Ambition, to take cognizance of and possibly modify personal data.

1.11 Providing personal data to third parties. Making personal data known or available outside the organisation of Shared Ambition.

### 1.12 Third parties

All contracted persons not belonging to the organisation, who have been assigned by Shared Ambition for work for a shorter or longer term.

## Article 2 - Scope

2.1 This Regulation applies to all processing of personal data within Shared Ambition.

## Article 3 - Goal of processing personal data

3.1 The goal of processing personal data is to record and to be able to access data, which is required for performing the services agreed with the client.

3.2 No personal data will be processed for objectives other than those set out in the Regulation. The processing of personal data will take place only in accordance with this objective.

## Article 4 - Objective of processing personal data

4.1 The processing of the personal data this Regulation applies to is defined in Appendix 1. This appendix specifies, among other things, who acts as data manager and which employees use the data. This appendix constitutes an inseparable part of this Regulation.

4.2 The controller is responsible for the proper functioning of the processing of the personal data and for the compliance with the provisions of this Regulation. The actions of the controller in relation to processing the personal data and making them available are restricted by this Regulation.

4.3 The Shared Ambition Management Board is not liable if a client is liable for the processing of personal data.

4.4 The controller assigns the responsibility for the daily care of the processing of the personal data to the data manager.

4.5 The controller will take all the necessary provisions to ensure the accuracy and completeness of the data recorded. He/she will also ensure that the necessary



technical and organisational provisions for securing the personal data against loss or damage and against unauthorised inspection, modification or making available of the personal data.

#### **Article 5 - Access to the personal data**

5.1 Only employees who need access to the personal data for the performance of their job will have access to personal data.

5.2 Everyone with access to the personal data has a duty of confidentiality in respect of the data he/she has taken cognizance of by virtue of this access.

5.3 Third parties contracted by Shared Ambition to perform work have access to the processed personal data insofar as this is necessary for the performance of their job and are held to the duty of confidentiality via the contractual agreement.

#### **Article 6 - Security of the personal data**

6.1 Personal data are handled carefully.  
To this end, the data are sufficiently secured.

6.2 In consultation with the data manager, the controller sets out security regulations/guidelines for the personal data.

#### **Article 7 - Making data available**

7.1 Express written permission from the data subject is required for making personal data available to third persons, unless such is necessary for the performance of a legal regulation, or if a situation as described in Article 7.3 applies.

7.2 Within the organisation of Shared Ambition, personal data may be made available without the consent of the data subject to the following persons, if and insofar as this is necessary for the performance of their job:

- Those who are directly involved in the current coaching of or advising about the data subject, or who are involved in another way with the performance of a concrete assignment from the client;
- Persons tasked with direct professional coaching of the data subject or persons who are involved in the handling of complaints of the data subject;
- The controller, in connection with his/her general responsibility as controller.

7.3 Outside the organisation of Shared Ambition, personal data may be made available without the consent of the data subject to the following persons, if and insofar as this is necessary for the performance of their job:

- Clients within the context of the agreed services;
- Suppliers insofar as these data are required for an effective performance of the assignment;

- Persons who, by virtue of an agreement concluded for that purpose, approved by the controller, tasked with the maintenance and upkeep of the equipment and software for the benefit of the personal data and insofar as access to the data is necessary for the performance of their job;

- Third parties who, by virtue of an agreement concluded for this purpose have been approved by the controller, perform work for Shared Ambition and insofar as these data are required for an effective performance of the assignment.

7.4 For further information regarding Article 7.1 through to Article 7.3, we refer you to Appendix 1.

#### **Article 8 Inspection of recorded data**

8.1 The data subject has the right to inspect the data relating to his/her person and to receive a copy of such. He/she shall submit their request for this in writing to the data manager. They will forward the request to the user, who has taken the initiative to collect the data in question, their deputy or their successor.

8.2 A request within the meaning of this Article will be met within four weeks after its receipt.

8.3 The data requested by the data subject or his/her authorised representative will not be provided until it's sufficiently clear, in the opinion of the person whom the request is submitted to, that the person who requests the data is the data subject or his/her authorised representative. This shall take place by means of valid proof of identity.

8.4 The data manager may refuse to meet with a request as referred to in this article, insofar as this is necessary on account of the important interests of people other than the applicant, the organisation of the controller included.

8.5 A fee may be charged for providing copies. Appendix 2 of this Regulation sets out what is meant by a reasonable fee.

#### **Article 9 - Addition, correction or destruction of recorded data**

9.1 If so requested, the recorded data will be supplemented with a statement given by the data subject with respect to the recorded data.

9.2 If recorded data are factually incorrect, incomplete or irrelevant for the purpose of processing, or in violation of a legal regulation of the processing, the data subject can submit a written request to the data manager specifying the correction to be effected. The data manager will not make a decision until the agent or their deputy or successor who has collected the data has been heard.



9.3 Within four weeks after receipt of the request, the data manager will notify the applicant in writing whether or to what extent the request for correction or destruction will be met. A refusal will be substantiated.

9.4 Destruction will be omitted if it is reasonably credible that keeping the data is of substantial importance to people other than the data subject, and also when it is required by virtue of a legal regulation to keep the data.

9.5 The data manager will ensure that a decision to supplement, correct or destroy the data will take place as quickly as possible.

9.6 In the event data are destroyed, a statement will be included with the data that the data subject requested the data to be destroyed.

#### **Article 10 - Right to object**

10.1 The data subject has a right to have personal data blocked insofar as they are used for commercial goals to offer products and services, the so-called right to object.

10.2 The data subject shall submit their objection to Shared Ambition in writing. The address for sending the objection is stated in the explanation.

10.3 Once the objection has been filed, the data will immediately be blocked, both by Shared Ambition and by third parties where the right to object has been submitted.

#### **Article 11 - Retention periods**

11.1 With due regard to any legal regulations, the controller will determine how long the personal data will be kept. Unless otherwise provided, the retention period is 10 years after the last contact with the registered person.

11.2 If the retention period has elapsed, the personal data in question will be removed from the processing of personal data and destroyed, such within a term of one year.

#### **Article 12 - Complaints**

12.1 If the data subject is of the opinion that the provisions of this Regulation are not observed or if they have other reasons to complain, they should apply to the controller.

12.2 The controller will take a decision within 6 weeks after receipt of the complaint. The decision will be formulated in such a way that an appeal to the **Dutch DPA** or the court will be possible. The complaint will be dealt with in accordance with Shared Ambition's complaint procedure.

#### **Article 13 - Final provisions**

13.1 Without prejudice to any legal provisions, this

Regulation is in effect during the entire duration of the processing of personal data.

13.2 This Regulation can be amended by decision by the controller.

13.3 This Regulation entered into force on 1 January 2005. The Regulation can be inspected at Shared Ambition.

13.4 A copy can be provided if so required.

#### **Appendix 1 - The processing of personal data**

This appendix constitutes an inseparable part of the Shared Ambition Privacy Regulation.

Shared Ambition processes electronic and paper data. In principle, an electronic file is made for every client. This is stored in the computer. In some cases, a paper file is also kept. This is primarily for day to day use.

#### **Personal Data**

Shared Ambition makes use of your personal data to be able to offer you and our clients with the agreed services. In part, we receive these personal data from our client with whom we have concluded an agreement. In part, personal data are processed as a result of our own service provision.

Shared Ambition therefore has personal data on two levels:

- Data we receive from a client. Depending on the services Shared Ambition provides to a client on a contractual basis, Shared Ambition receives data from the client. On the one hand, this involves names, addresses and places of residence, possible with extra data, but essentially no different from the information in a phone book. On the other hand, it may involve additional data which is necessary for the assignment. This includes for example your own submitted application or the reintegration file already recorded by the client. The client will provide no more data to Shared Ambition than is strictly necessary to implementing the assignment.

- Data as a result of the Shared Ambition services provision. From the data we receive from a client, we develop new personal data, often in cooperation with you. We may advise the client for example regarding your submitted application. This often entails making a (medical, psychological or other) diagnosis. But we also maintain various contacts with you and third parties. An example of this is contact with an employer. When healthcare is concerned, an example would be contact with a supplier of care facilities. All these clients – and other contacts are often stored in the computer. This also means that you provide us with personal data, for example when you phone us or give us information in a different way.



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## Users

The following are considered users of personal data: Medical specialists, (company) doctors, reintegration experts, exercise experts, psychologists, administrative employees and other professional employees to be appointed in the future.

None of the users has the authority to correct or destroy the data. Correction or destruction of personal data is reserved for the data manager.

## Data manager

The following are considered data manager of personal data:

- Management Board.
- Everyone who uses electronic and paper data within his/her own centre.

With regard to electronic data, the data manager is supported by the head of the automation department and the automation staff working under his/her direct supervision.

## Electronic data

All users have access to the electronic data, with the exception of medical data. The medical data are accessible only by those people who have been authorised for such.

If and insofar as this is required for the performance of their job, the data manager and the automation staff have access to all electronic data, including the medical data.

This separation of functions ensures a careful processing of personal data.

## Paper data

The paper data are stored in a file. The files are assigned to a specific user or group of users. These users, their deputies or successors, are responsible for the careful management of the files assigned to them. Other employees only have access to these files insofar as this is necessary for the performance of their job.

## Appendix 2 - Fee for copies of recorded personal data

This appendix constitutes an inseparable part of the Shared Ambition Privacy Regulation.

When copies are provided to the data subject or their authorised representative, the following costs will be charged.

- From 1 to 10 pages: no costs
- From 11 pages: €0.10 per page up to a maximum amount of €5.00.

## Appendix 3 - Inspection and/or correction

Here, an explanation to the privacy regulation is provided for each article. Shared Ambition strives to make everything in the privacy regulation clear and comprehensible.

### Inspection of recorded data

You have the right to inspect the personal data Shared Ambition keeps about you and to receive copies of them. For this to happen, you must write a letter to Shared Ambition.

You should send the letter to the Shared Ambition office where you have visited or with which have been in contact. You should address the letter to the Director.

The Director will ensure that an employee of Shared Ambition will show you the data and provide you with copies of them, if so desired. If you submit a request to inspect your data or to receive copies of them, Shared Ambition will ensure that this takes place within four weeks.

You may inspect the data or receive copies of them only if it is clear that the data are yours. You may also enlist another person's assistance with your request. Shared Ambition may then ask for a written statement in which you say that you desire the other person's assistance.

This written statement should include the name of the person who helps you and you should sign the statement. Shared Ambition will also ask you and the person who helps you for ID. (For example, by showing a passport or driving licence).

The Director may decide to not show you the data or give you copies of them. This is possible only if he/she has important interests to do so.

If you wish to receive copies of the data, Shared Ambition may charge a fee for this. Appendix 2 states which fee Shared Ambition will charge.

### Addition, correction or destruction of recorded data

You have the right to add to your personal data with Shared Ambition. In doing so, you should make clear which data should be added to.

You may also request to have data amended or destroyed. You can do this if the data are (demonstrably) incorrect, do not correspond to the stated purpose, are irrelevant or in violation of a law. The Director will not effect any changes until he/she has consulted the employee of Shared Ambition who collected the data or another employee of Shared Ambition who knows about the situation.



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You will receive a letter from the Director within four weeks whether he/she will change or destroy the data. When the Director will not change or destroy the data, he/she will state in the reason for this in the letter.

Data will not be destroyed if Shared Ambition can demonstrate that something or someone has a greater interest in the fact that the data should be kept. This may also be the case if a law states that the data should be kept.

The Director has the responsibility to add to, change or destroy the data as quickly as possible. If data are destroyed, a statement will be added to your file which says that the data have been destroyed at your request.

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## Shared Ambition

Overschiestraat 184  
1062 XK Amsterdam

t. +31 (0)33 433 70 10  
info@sharedambition.com

[www.sharedambition.com](http://www.sharedambition.com)