

The General Data Protection Regulation (GDPR) requires Zein International Child Care to ensure it complies in terms of protection of privacy by design (i.t.o. personal data of parents, children, teachers and arbitrary office staff), that only necessary data is recorded and kept, and that processing, access-control and securitisation protocols are in place to protect the use (processing) of, and access to, personal data.

Privacy Statement

(GDPR Compliance)

Zein Child Care B.V.
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2596AV Den Haag
Telephone: 070 – 3268 263
Data Protection Officer Email: info@zeinchildcare.nl
KvK-Nummer: 27262602

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1) Changes under the EU-GDPR

On May 25th 2018, the EU General Data Protection Regulation (hereinafter referred to as GDPR) was activated. The new regulation replaces all previous data protection regulations in EU countries.

The Regulation updates and modernises the principles enshrined in the 1995 Data Protection Directive to guarantee privacy rights. It focuses on:

- reinforcing individuals' rights;
- strengthening the EU internal market;
- ensuring stronger enforcement of the rules;
- streamlining international transfers of personal data and;
- setting global data protection standards.

The GDPR give EU citizens (including foreigners residing in an EU country) more control over their personal data and make it easier to access it. The Regulation is designed to ensure that people's personal information is protected – no matter where it is recorded, sent, processed or stored – even outside the EU.

2) Zein Locations and Services

Zein operates 7 locations in and around Den Haag, providing childcare in the form of Day Care, Pre-School and After School Care(ASC). Zein has childcare locations located at the following addresses:

(1) Head Office – The Estate (Den Haag)

Jozef Israelsplein 36, 2596 AV Den Haag
Telephone: 070 – 2002476

Estate Day-Care (0 – 4 years)

Day-Care Telephone: 070 – 2002375

Estate Pre-School (2.5 – 4 years)

Pre-School Telephone: 070 – 2002375

Estate ASC

OSC Telephone: 070 – 2002374

(2) The Willows @ BSN (Leidschenveen)

Vrouw Avenweg 640, 2493 WZ
Leidschenveen

Willows Day-Care (0 – 4 years)

Telephone: 070 – 4445800

Willows ASC (3+) – 12 years)

OSC Telephone: 070 – 2002374

(3) he Maples @ ESH (Den Haag)

Houtrustweg 2a, 2566 AH Den Haag
(Bomenbuurt)

Maples Day-Care (0 - 4 years)

Location land line: 070 – 2057425

Maples Pre-School (2.5 – 4 years)

Location land line: 070 – 205 7425

Maples ASC for ESH (4 – 12 years)

ASC Telephone: 070 – 2002374

(4) Little Castle Day-Care (0 - 4 years)

Park de Werve 1, 2247 ES Voorburg
Location land line: 070 – 219253

(5) The Elms – ASC for Le Lycée Français (4 - 12 years)

Ver-Huellweg 2, 2585 JC Den Haag
(Central)

OSC Telephone: 070 – 2002374

(6) The Oaks – ASC for ISH (4 – 12 years)

Wijndaelerweg 9, 2554 BZ Den Haag (Kijkduin)
OSC Telephone: 070 – 2002374

(7) The Pines – ASC for HSV (Den Haag) (4 - 12 years)

Van Hogenhoucklaan 35, 2596 TA Den Haag
OSC Telephone: 070 – 2002374

(8) The Palms – ASC for French Int. School (Amsterdam) (4 - 12 years)

Anthonie van Dijkstraat 1, 1077 ME Amsterdam
OSC Telephone: 070 – 2002374

3) Zein - responsible entity and DPO contact

Zein Child Care Group B.V. (hereinafter referred to as Zein), an international child care provider in The Hague, is responsible for the processing of personal data as shown in this privacy statement. JH Smit is registered as Data Protection Officer (DPO) at Zein (Reg No: FG 004679), in the DPO register of the Autoriteit Persoonsgegevens (AP) of the Netherlands. The DPO can be reached via email on info@zeinchildcare.nl and/or via telephone, on +31 070 2002374.

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a) Clarification of Purpose & Application

This Privacy regulation statement provides clarity regarding the processing and use of personal data and associated visual material within the operational sphere of Zein, based on compliance with the EU General Data Protection Regulation (GDPR). It describes the extent, purpose and administrative detail of capturing and processing of personal data, of Zein customers and their children, the ultimate recipients of the child care services that Zein provides.

4) Data recorded when registering with Zein

Information is requested from parents/guardians, when registering your child and applying for a place in Zein Day Care, Pre-School or OSC (via our website, email or telephone). When you register your child(ren) at Zein, we record vital information eventually used in execution of a legal contract and to create a child file for our pedagogical staff. When storing this data, statutory advised storage periods are considered, and standard data security, processing and access control protocols are observed. Zein securely keeps the following personal data of you/your child:

a) Enrolment forms Day Care, Pre-School and OSC – Data Requested

i) *Of the child(ren):*

- Start Date
- Type of care required (Day Care, Pre-School or OSC)
- Preferred location
- Preferred days
- Child's First Name/Surname
- Date of Birth
- Gender
- Nationality
- Home Language(s)
- BSN Number (if available)
- Current place/concern where care is provided
- School choice

ii) *Of the parent(s):*

Parent (1)

- Title
- First/Last Name
- Address (Street, postcode, town/city)
- Email address(s)
- Mobile No./Daytime Phone No.
- BSN Number Parent (1)
- Company Name

Parent (2)

- Title
- First/Last Name
- Address (Street, postcode, town/city)
- Email address(s)
- Mobile No./Daytime Phone No.
- BSN Number Parent (2)
- Company Name

b) Arbitrary data captured and kept in digital or hard copy files

- Agreement/contract for provision of either Day Care, Pre-School and OSC
- Child data card (hard copy) for Day Care/Pre-School and OSC pedagogical staff
- Observations of Day Care/Pre-School daily activities**

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- Incident Reports regarding deviant behaviour of children in OSC**
Note: When deemed necessary, and to support discussions with parents
- Permission to merge groups of respectively Day Care/Pre-School and OSC*
- Permission statement of abdomen sleep 0 - 1.5 years of Day Care children*
- Permission statement for recording visual material of activities when on field trips outside Zein Childcare locations of Day Care, Pre-School and OSC*
- Consent form for self-reliance for OSC children*
- Statement of medicine administration for Day Care, Pre-School and OSC *
- Checklist of medication administration for Day Care, Pre-School and OSC**
- Declaration of competence/consent for carrying out medical procedures for Day Care/Pre-School & OSC
- Action plan in terms of medical act of the law Day Care/Pre-School and OSC**
- Action plan 'acute allergic reaction' Day Care/Pre-School and OSC**
- Report parent conversation Day Care/Pre-School and OSC**
- Child report group consultation Day Care/Pre-School and OSC**
- Overview reporting and associated reports KDV and BSO
- ID of parents / caretakers / consented adults, children (if available) and employees of Zein*
- Parents/carers provide consent to use images of their child with an opt-out email sent at registration.

* *Note: Categories marked with one asterisk* are not applicable in equal consideration to all forms of childcare provided. Items marked with one asterisk* are mainly indicated/provided by parents.*

** *Data is recorded/provided by the Zein pedagogical employee.*

c) Recording and Storage of Visual material

Zein records certain forms of visual material of children, teachers and trainees (and occasionally of parents who enter the facilities) in line with our safety and security protocols. The types of recording may vary within groups and the diverse services offered, e.g. access control and the recording of processes/play of Day Care, Pre-School and OSC during the course of the day, via CCTV cameras at all locations. In the various groups, teachers regularly take photographs to record momentous occasions, or everyday arbitrary events that may be of interest to the parents of the child.

The stills photography is generally provided to parents only, and only used in printed or online material if the responsible person concerned (parent/guardian) has provided Zein with consent via an opt-in process and protocol. If consent is either (1) not given at the outset or, (2) withdrawn at some point during the contract, this decision is respected and protocol implemented to ensure Zein complies with the request. Said protocol ensures that any such data is not used, displayed, or shared, other than for operational purposes that is necessary in executing the service of caring for your child, or when providing images to parents for their records. Zein maintains social media accounts on e.g. FaceBook and Instagram, sharing general information with parents and interested parties. The same opt-in consent rules apply to the use of any photographic material on any social media platform in use by Zein.

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5) Processing & monitoring of personal data

Zein uses personal (static) information necessary from a statutory perspective, e.g. for entering into the customary legally binding contract. Once a contract has been entered into, personal data is processed by our internal operations teams, and by certain contracted external service providers, in execution and provision of the service(s). Zein (and/or external SaaS suppliers) do not use personal information for any purposes other than in the provision and administration of its diverse childcare services.

Our registered DPO is assigned responsibility in terms of ensuring compliance to the GDPR, monitoring the recording, secure processing and maintenance of personal data by Zein.

a) What do we use captured personal data for?

Zein records the data expressly for the following purposes only:

- invoicing and the execution of the agreement,
- records that are important for the receipt, care, supervision and development of the child,
- maintaining contact with the parents, guardians and caretakers of the children,
- providing support for application for subsidy/allowances.

Certain service provider companies process certain personal data per assignment by Zein. Data processing by external parties, are expressly necessary for the execution of our service agreement with our customers. We do not sell or provide personal data to third parties for any other purposes. We have entered into processor agreements with all external service providers to ensure the required level of security and confidentiality of personal data is maintained. Zein remains ultimately responsible for processing operations performed by any such appointed sub-processors and said processor agreements are available to be viewed in our GDPR Register.

b) Code of Conduct

Zein employees are instructed to treat your privacy-sensitive data with the utmost care. The following Code of Conduct is strictly observed by employees:

- sensitive, private matters are discussed privately;
- if sensitive matters are discussed with parents during the pick-up or drop-off time, this will take place in privacy where other parents cannot follow the conversation;
- no case with name and surname is discussed outside the office;
- children are referred to by initials only in minutes of departmental meetings. The transfer folder is for internal use, in which names can be written out in full;
- written information is stored carefully and access controlled;
- notebook entries are only intended for the child's parents. Other parents cannot see this;

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- pedagogical employees inform parents of the OSC of everything that has been discussed with the teacher during pick-up from the school;
- talking to parents in negative terms about other children in the group is not allowed;
- no private data of employees is provided to parents;
- computers on-site are protected with a password; there is a separate team account and an account for the location manager.

These persons have access to your/your child's data in the execution of their duties:

- Management in various departments
- Location managers
- Pedagogical staff*

**Note: Pedagogical employees only have access to the child-card.*

6) Storing of data

Zein will not store your personal data any longer than is strictly necessary to realize the purposes for which your data is collected, and or as prescribed by the GGD or other applicable statutory regulations.

a) Network & Data Security

Zein employs a Microsoft Office 365 subscription, that include access to Office tools and other productivity services that are enabled over the Internet. Combined with a homogenous operating platform on all PC's (Win10 Pro), our hardware and communications-network infrastructure features state-of-the-art security and antivirus programs, secure server connections and is maintained employing the following:

- Multi-Factor Authentication (MFA)
- Advanced Security Management
- Advanced Threat Protection
- Virus and Malware Protection

b) How is your data stored and maintained?

Zein stores your data in a number of ways, for practical application during execution of standard operational procedures and for record keeping purposes.

i) Digital

- Data is kept in digital format in a SaaS programme for registration, planning and contracting employed by Zein. Compliant with GDPR subscribed protocols, Zein has entered into a processor agreement with the software vendor, governing all aspects of data security, integrity, administration and use.
- Data is processed by a subsidiary SaaS parent communications platform, featuring a parent portal and mobile app.

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- Certain data is also kept in internal digital files, used to prepare e.g. weekly group attendance name-lists, school pick-up lists etc.
- We record and store CCTV camera footage in and around locations for 14 days at a time, after which the recording is wiped.

(1) Use of Cookies on our website

Cookies are small (text) files that a web server saves on your computer or other electronic devices when you visit a website. Zein International Childcare uses cookies.

Your consent is required for the use of certain cookies. Following applicable law, we only place performance and analytical cookies with your prior consent. You can give your consent using our Cookie Banner, which is initially shown to you when you visit our website. This banner may be redisplayed from time to time, for example, if a specific cookie is rejected or deleted or if your permission has expired.

(2) Types of Cookies

There are different kinds of cookies; Zein International Childcare uses the following types of cookies:

Functional/Essential Cookies: These cookies are of significant importance for the proper functioning of our website and ensure the website is both performant and user-friendly.

Analytical Cookies: An anonymous cookie is generated when you visit the website. They detect whether a user has visited the site before, allowing the following data to be collected:

- how often users visit the site
- the number of unique visitors
- the pages users view
- how long users spend on a particular page
- the page visitors leave the site

Tracking Pixels & Other Cookies: Finally, we may use cookies and/or comparable techniques such as social media tracking pixels or site improvement cookies to improve the use of our website, products, services and our marketing strategies.

(3) Your Data Rights Pertaining to our website

You have the right to access, rectify, restrict and demand the deletion of your personal data. You also have the right to object to the processing of personal data and the right to data portability. If you would like to exercise these rights, please send an email to info@zeinchildcare.nl with the subject line Website Personal Data. To prevent abuse and guarantee your identity, we may ask you to verify your identity. To access the personal data

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linked to a cookie, you will need to send us a copy of the cookie in question which can be found in your browser settings.

If you wish to block or delete cookies, you can do so using your browser, you can also change the settings in your browser so that you receive a message when a cookie is placed or so certain cookies are not placed. Please note that if you delete the cookies in your browser, it can have consequences for the later use of our website; some site features and functionality may be lost. In addition, refusing cookies does not mean that you will no longer see any advertisements, but that ads will no longer be tailored to your interests.

Some tracking cookies are placed by third parties who, among other things, display advertisements to you via our website. You can delete these cookies centrally via www.youronlinechoices.eu.

c) Where is the data stored?

i) Internally

Parents and children's data are kept in hard copy and digital format.

- In line with GGD regulation, hard copies of the child card(s) are kept in the group folder for ease of access by pedagogical staff, in case of emergency. Upon termination of a contract, the child card is removed from the folder and shredded.
- Certain data is collated, printed and used to create group attendance name-and school pick-up lists. Used/expired lists are sent back the main office, where they are shredded once data necessary for operational reporting has been extracted.

ii) Externally

Zein employs a SaaS programme, to capture and store data, plan and administer the registration, group planning and contact details of (1) parents (responsible or guardian) and (2), their children registered to attend one of the child care service locations of Zein. The SaaS software hosts the databank service for a parent and teacher app, from where relevant personal information about child and parent is drawn during the course of providing our childcare services.

d) Data retention period(s)

i) Personal data collected via enrolment form(s):

During the term of the agreement and up to a maximum of 2 years thereafter.

ii) Hard Copies

During the term of the agreement, up-to-date child cards (hard copy) are kept in a file folder in the group location, that only pedagogical staff have access to. In addition, the child's name, group, school and class (only ASC) will be recorded on weekly attendance and pick-up lists.

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iii) Digital Photography & CCTV Footage

We take photos of daily activity in the groups and around the location playground, which is provided to parents who want it. Unused or obsolete photography is deleted. We record and keep CCTV camera footage on a 14-day rotation schedule, after which the recording device memory is wiped automatically when a new 14-day period commences.

e) Access to your data

To request a copy of your data held by Zein, kindly send us an email to: info@zeinchildcare.nl to request a copy of the data we hold of you or your child.

f) Right to be forgotten

The GDPR introduces a right for individuals to have personal data erased. The right to erasure is also known as 'the right to be forgotten'. Individuals can make a request for erasure verbally or in writing, to the DPO on telephone (+31 (0) 70 2374, or via email on info@zeinchildcare.nl. Zein will respond within one month to a request to be forgotten.

7) Children's data require special care

Zein needs parental consent to process children's data. Under Dutch Law, a child is classed as anyone under 16*. Zein ensures that we (1) obtain the necessary consent regarding data processing, (2) the recorded data is properly secured in our file administration setup and (3) may disclose confidential medical conditions to our teachers and, in case of emergency, medical support staff, if and when applicable.

(*Source: <https://www.linklaters.com/en/insights/data-protected/data-protected---netherlands>)

a) Specific protection for children under the GDPR

The Regulation recognises that children deserve specific protection of their personal data, as they may be less aware of risks, consequences, safeguards and their rights in relation to the processing of their personal data. For instance, they benefit from a clearer right to erasure.

When it comes to services offered that involves a child, the Regulation foresees that consent for processing the data of a child must be given or authorised by, the holder of the parental responsibility over the child.

Note: The Regulation specifies that the consent of the holder of parental responsibility should not be necessary in the context of preventive or counselling services provided directly to a child, e.g. in context of supervisory roles executed by ASC teachers.

i) Providing consent for use of children's data

As a responsible controller of your child's personal data, Zein ensures that all reasonable efforts are pursued to obtain and verify parental consent.

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b) What steps does Zein take to protect my child's personal information?

Zein conducts regular Data Protection Impact Assessment to ensure GDPR compliance, and perform the prescribed checks to establish, verify and scrutinise internal and external administrative and operational process and procedure relative to data processing in all its facets. In addition, security and access protocols are regularly revisited, including reviewing our consent protocols to ensure compliancy to the GDPR. The afore mentioned checks and balances are monitored and revisited annually.

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