

Zein Childcare Privacy Statement

Zein Childcare, located at Jozef Israelsplein 36 2596 AV The Hague, is responsible for processing personal data, as shown in this privacy statement.

In this context, personal data means all data that can be used to directly or indirectly identify an individual. If it is necessary to inform you about certain matters, then we refer to the privacy statement as this document.

Categories of people

We process the personal data of the following categories of individuals:

- ✿ Parents and children using our childcare services.
- ✿ Applicants - individuals looking for a job or those actually applying for a job at Zein Childcare.
- ✿ Website visitors - individuals who visit the website <http://www.zeinchildcare.nl>.
- ✿ Suppliers and other third parties - persons from whom we purchase products or services and persons with whom we have contact other than the parties mentioned above.

Data we process

We process your personal data because you use our services and because you provide this data to us yourself. For example, we process the following personal data for the placement agreement, our services and invoicing.

Parent/caregiver

- ✿ Title, first and last name
- ✿ Gender
- ✿ Address
- ✿ Date and place of birth
- ✿ Phone number
- ✿ Nationality
- ✿ E-mail address
- ✿ Social security number (Burgerservicenummer -BSN)
- ✿ IBAN/Bank account number
- ✿ Only relevant to preschool education (with subsidy): income details
- ✿ Other personal data that you have actively provided either in correspondence or by phone

Child

- ✿ First and last name
- ✿ Gender
- ✿ Nationality
- ✿ Address
- ✿ Date and place of birth
- ✿ Social security number (Burgerservicenummer-BSN)
- ✿ Child monitoring system (you receive this when the childcare services end)
- ✿ Health/Medical information
- ✿ Other personal data that you have actively provided either in correspondence or by phone

Job Applicants

- ✿ First and last name
- ✿ Gender
- ✿ Address
- ✿ Date and place of birth
- ✿ Telephone number

- * Email address
- * Education
- * Employment history and other information you have shared with us via your c.v.
- * Other personal data that you have actively provided either in correspondence or by phone

Website Visitors

- * Communication data (data of the devices used to visit the website, such as the IP address and the software used)
- * Technical data (data to identify visitors to the website and communication with the visitors or data registered to analyse the visitor's statistics of our website)

Suppliers and third parties

- * First and last name
- * Gender
- * Address
- * Phone number
- * Chamber of Commerce number (KvK)
- * VAT number
- * Email address
- * IBAN/Bank account number
- * Order data
- * (in some cases) statement of conduct and identity card data, if the processing is required to meet legal obligations
- * Other personal data that you have actively provided either in correspondence or by phone

Type of childcare

In addition, we collect children's data to tailor the childcare to the child's needs as much as possible. This concerns, among other things, allergy information, dietary requirements and vaccinations. The development of the children is also carefully monitored with our monitoring system.

Processing the social security number (BSN)

Your child's social security number is, of course, sensitive information because it is a unique number. We need your child's social security number to meet the legal requirements for the tax and healthcare authorities (Belastingdienst and GGD). Therefore, the social security number is kept extra-secure at BLOS. This means the number is only visible to BLOS employees who need it to carry out their work. The number is shielded for all other employees except the last three digits to ensure your child's social security number is safely stored.

Purpose of processing personal data

Of the six possible legal grounds, we generally process your personal data for one of the following reasons.

- * To complete a contract. We process your data for the completion of a contractual agreement with you.
- * Legal obligation. We may process your personal data to fulfil legal obligations,
- * Legitimate interest. We process your personal data for our or other parties' legitimate interest, and if those interests precede your interests or fundamental rights, we are permitted to process your personal data.
- * Permission. If the abovementioned three reasons are not applicable, we may only process your data if you have given us written authorisation.

Sharing personal data with third parties

Zein Childcare does not sell your data to third parties and only provides data to third parties if necessary to perform our tasks and/or comply with a legal obligation. We enter a processing agreement with third parties who process your data on our behalf to ensure the same level of security and confidentiality of your data as provided within Zein Childcare. Zein Childcare remains responsible for these processing operations.

We only pass on personal data to parties with whom we have concluded a processing agreement with written permission from the data subject. An exception is the sharing of data with competent authorities based on a legal obligation. For example, we provide childcare service data to the Tax and Customs Administration. As a childcare organisation, we are legally obliged to do this in the context of the childcare allowance. In this case, we must cooperate with the relevant competent authority, and we are obliged to provide specific personal data. We will also provide data without permission if this is deemed necessary to tackle or prevent serious risk or danger to the data subject's health, such as (a suspicion of) abuse or neglect.

Personal Data Protection Policy

We have taken appropriate technical and organisational measures to protect personal data against unlawful processing. The following steps have been taken (among others):

- ✿ Personal data is protected from individuals not authorised to be informed of it. Only persons authorised to be informed of the personal data have access to this data.
- ✿ All individuals who may be informed of your personal data on behalf of Zein Childcare are bound by confidentiality. This is included in employee contracts. In addition, our systems are secured with usernames and passwords and multi-factor authentication (MFA).
- ✿ We make secure backups of personal data to restore it in the event of physical or technical problems.
- ✿ All our employees have been informed about the importance of protecting personal data.
- ✿ We do not provide personal data to parties located outside the EU.
- ✿ We enter a processing agreement with third parties with whom we share personal data unless we have a legal obligation to share personal data (for example, with the tax authorities).

Personal Data Retention Policy

Zein Childcare only stores your personal data as long as strictly necessary. We use the legal retention periods for personal data. For all personal data without a legal retention period, we use a maximum retention period of 2 years after the end of the agreement.

Audio and Visual Material Policy

At our childcare locations, photos are sometimes taken by the press or for internal use or publicity. If children are recognisable in the image, we always request written permission from the parents before using these photos.

CCTV

At some locations, Zein Childcare uses camera surveillance on the groups during opening hours. This decision was made to comply with the legal obligation of the four-eyes principle (for more information about this principle, see our Health and Safety policy, which is available at each of our childcare locations). A DPIA (Data Privacy Impact Assessment) has been drawn up for these locations so that the processing of personal data and its scope and impact is regularly monitored. Where applicable on location, signs indicate that camera surveillance is being used. Parents and employees are also informed about the camera surveillance during the introductory meeting.

Camera surveillance is also used in the outdoor area at various locations. These cameras are only used outside opening hours for security purposes and to protect our property.

Social Media

Zein Childcare also uses social media. Our websites have links to Facebook, YouTube, Instagram and LinkedIn. We do not have active acquisition for these social media. Joining these pages is entirely at the discretion of our customers.

Zein Childcare puts photos of their child(ren) on the digital parent portal with the parent's permission. Parents can download these photos for their use. However, if parents decide to post these photos on their social media, this is beyond the responsibility of Zein Childcare.

Website Cookies

Cookies are small text files placed on your computer, laptop, tablet, smartphone or other device with internet access. These cookies can be stored and read through your web browser. After a cookie has been placed, your device can be recognised as long as you use the same web browser and the cookie has not been deleted. This enables clicking back to the previously visited web page. Functional cookies are cookies that are necessary for the proper functioning of our website. More precisely, these are cookies: (i) that are used exclusively to facilitate communication or (ii) that are strictly necessary for a service requested by the website visitor.

Cookies can also be used to analyse surfing behaviour. Analytical cookies are used to obtain information about the quality or effectiveness of a website. We use these cookies to improve our website. These cookies are legally exempt from the cookie consent requirement; therefore, we do not ask you for permission but inform you about them. We use the Google Analytics service for this.

Rights of the Provider of Personal Data

The provider of personal data has the right to access, modify, correct and delete the personal data provided related to them. A request for access or a copy of the personal data will be provided as soon as possible, at the latest within 4 weeks. A reasonable fee may be charged for providing a copy. There may be restrictions on the right to access/copy when compelling interests play a role for others than the provider of the personal data. A request for addition, correction or deletion will be executed as soon as possible. Any refusal will be communicated in writing within 4 weeks, explaining the reasoning. An exception to this is when data retention is required by law.

You can send a request for access, modification, correction, or data transfer of your personal data or a request for withdrawal of your consent or objection to processing your personal data to GDPR@zeinchildcare.nl.

We ask you to enclose a copy of your proof of identity with the request to ensure that you have requested the inspection. Black out your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), document number, BSN, height and place of birth in that copy to protect your privacy. With the Kopie-ID app, you can make a safe copy of your proof of identity. For more information about this, see the Central Government's Kopie-ID tool, which can be found via the following link: <https://www.rijksoverheid.nl/onderwerpen/identiteitsfraude/vragen-en-response/veilige-kopie-identiteitsproof>

We will respond to your request as quickly as possible but at the latest within four weeks. Suppose we do not comply with your request to view, modify or delete your personal data. In that case, you can submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

Questions

Do you have any questions or comments regarding our privacy statement?

Please contact us:

Zein Childcare B.V.

attn: Data Privacy Officer

Jozef Israelsplein 36

2596 AV Den Haag

070-2002375

GDPR@zeinchildcare.nl