



Zein Childcare Privacy Statement

Zein Childcare, located at Jozelf Israelsplein 36 2596 AV The Hague, part of Babilou Family Nederland B.V. is, together with Babilou Family Nederland, responsible for the processing of personal data, as reflected 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, we will do so with reference to this privacy statement.

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

Zein Childcare processes your personal data because you use our services and because you provide this data to us yourself. We collect the following personal data for the execution of the placement agreement, our services and the invoicing thereof.

Parent/caregiver

- Title, first name and surname
- Gender
- Address
- Date and place of birth
- Telephone 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 and/or by phone.

Child

- First name and surname
- 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 and/or by phone.

Job Applicants

- First name and surname
- Gender
- Address
- Date and place of birth
- Telephone number
- Email address
- Education
- Employment history and other information you have shared with us via your curriculum vitae.
- Other personal data that you have actively provided either in correspondence and/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 name and surname
- Gender
- Address
- Telephone 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 and/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. The processing of this sensitive personal data is necessary for us to be able to provide good childcare. We always ask for your permission to process this data.

Processing the social security number

We process your social security number (BSN) of and the BSN of your child to be able to meet the legal requirements of, among others, the Tax Authorities (*Belastingdienst*) in the context of childcare allowance (*kinderopvangtoeslag*). All sensitive personal data, such as a BSN is extra secured at BLOS. The full BSN only is visible to employees who need to have access to it in their specific role at work.



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.
- Consent. If the abovementioned three bases for data processing are not applicable, we will only process the data if you have given us your written consent to do so.

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 into a processing agreement with third parties who process your personal data on our behalf to ensure the same level of security and confidentiality of your data as we provide you with within Zein Childcare.

In some cases, we are required by law to share personal data. An example is the provision of daycare data to the Tax Authorities. As a childcare organisation, we are legally obliged to do this in the context of childcare benefit (*kinderopvangtoeslag*). In such case, we must cooperate with the relevant competent authority and are obliged to hand over certain personal data. Another example concerns the sharing of personal data if this is necessary to tackle or prevent serious risk or danger to the data subject's health, such as (a suspicion of) maltreatment or abuse. We should not and cannot look away.

Policy on securing personal data

We have taken appropriate technical and organisational measures to protect personal data against unlawful processing. We have taken (among other things) the following measures:

- 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 persons working for or at Zein Childcare or Babilou Family Nederland are obliged to keep information that they have obtained in the context of their work confidential, including personal data. A confidentiality undertaking is included in all (employment) contracts of our employees and independent contractors. Our systems are secured with usernames and passwords and Multi-Factor Authentication (MFA).
- We make secure backups of personal data to restore it in case of physical or technical problems.
- We do not provide personal data to parties located outside the EEA, unless the relevant country has an adequate level of data protection as within the EEA.

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 for press or publicity or internal use. If children are recognisable in the image, we always request written permission from the parents before using such images.



Audio and visual material is also taken during the children's care day. These photos are only shared on the digital parent portal and with parental permission.

We also use social media. Our websites provide links to Facebook, YouTube, Instagram and LinkedIn. The privacy statements of these social media organisations apply and are otherwise entirely separate from us. Parents have the option to download these photos for their own use. If parents decide to post these photos on their own social media, this falls outside the responsibility of Zein Childcare and Babilou Family Nederland.

Camera surveillance

At some locations, Zein Childcare uses camera surveillance at 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.

Website Cookies

Cookies are small text files placed on your computer, laptop, tablet, smartphone or other internet-enabled device. These cookies can be stored and read through your web browser. After a cookie has been placed, your device can be recognised for as long as you use the same web browser and for as long as the cookie has not been deleted. This makes it possible, for example, to click 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 browsing behaviour. Analytical cookies are used to obtain information about the quality or effectiveness of a website. We use these cookies to improve the quality and effectiveness of our website. We use the service Google Analytics for this purpose. Legally, these cookies are exempt from the consent requirement for cookies. We therefore do not ask you for permission to use these cookies but do inform you about them.

Data subjects' rights

Data subjects have the right to access, supplement, rectify and delete their personal data. A request for access or a copy of personal data will be provided as soon as possible, at the latest within 4 weeks. A possible limitation to the right of access/copy is when a legitimate interest is involved for others than the data subject. A request for addition, correction or deletion will be carried out as soon as possible, except when data retention is required by law. Any refusal to delete data will be communicated in writing, with argumentation, within 4 weeks after receipt of the request.

You can send a request for access, supplement, correct, transfer of your personal data, a request for withdrawal of your consent or objection to processing your personal data to info@babilou-family.nl.

To ensure that the request for access, supplement, correct, transfer is made by you, we may ask you additional questions to confirm your identity. So that we can be sure you are who you say you are.

We will respond to your request as soon as possible but at the latest within four weeks after receipt of your request.

If we do not comply with your request to access, modify or delete your personal data. You have the option to complain via our complaints procedure. This procedure can be found on our website. You also have the option



of submitting 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:

Info@babelou-family.nl

Zein Childcare
Attn: Data Privacy Officer
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070-2002375