



## PRIVACY POLICY

The General Data Protection Regulation (GDPR) requires Yasemi to specifically ensure it complies in terms of protection of privacy, that only necessary personal data is recorded and kept, and that processing, access control, and securitization protocols are in place to protect use (processing) of and access to personal data.

### Privacy Statement (GDPR compliance)

This Privacy regulation statement provides clarity regarding the processing and use of personal data and associated material within the operational sphere of Yasemi, based on compliance with the EU General Data Protection Regulation (GDPR).

#### Application

This privacy statement applies to the following categories of individuals:

1. (potential) clients
2. Clients of the practice
3. visitors to my website (add)
4. associates (supervisors, intervision colleagues, trainers etc.)

#### Processing of personal data

Personal data are all data that can be traced to a specific person (not to an organization, association or company). We distinguish them in ordinary and special personal data. Ordinary personal data provide factual information about a person (e. g name, date of birth, gender, nationality, Sofi-number/BSN, current address, contact details etc.). Special personal data concerns data of a sensitive nature (e. g information related to your mental and physical health, family history, sexual orientation, etc.).



#### I collect-process

- Personal data that the client has provided me with, either in person (orally or via website forms), or digitally (via e-mail)
- Personal data that referrers or other care providers have submitted to me under the written permission of the person concerned
- Personal data via audio recordings when the client involved has signed a written permission
- Anonymous visitor information by the website to track the number of visitors, duration of the visit and pages viewed

#### Legal basis

I process personal data under the following legal grounds:

- The written consent of the (former or current) client. This permission can always be withdrawn for the future, without this affecting the lawfulness of the processing of the data collected before the withdrawal
- Aiming to attend to a treatment plan and goals set in collaboration with the client
- A legal obligation, such as the obligation to keep records (according to NIP)
- A legitimate interest, such as the use of contact information for inviting a meeting or being paid for my services.

The basis for this personal data is the agreed request for help. The files containing your personal information are always locked away in restricted areas or password protected on computers in order to store your information safely.

#### Provision to third parties

For example, I may use a third party for:



- The internet environment of the GDPR program (to safeguard the privacy of your data)
- Taking care of the invoicing
- Reporting the tax in connection with my business operations
- Dealing with administrative tasks and referring my clients in case of my death or severe incapacity-injury to handle the tasks of my practice

I never pass on personal data to other parties I have not entered into a processor agreement. The processing agreement contains the necessary agreements to ensure the security of your personal data. Furthermore, I will not pass on the information provided by you to other parties, unless this is legally required and permitted. I will always share special personal data in accordance with the rules of NIP.

### Storage period

In my practice, I do not store personal data longer than necessary for the purpose for which it was provided or required by law. In other words, my records are held securely for as long as they are required for the purpose of our psychological work but also for my own accountability to external regulatory bodies. That means:

- Psychological/medical data: at least 20 years after the end of the treatment agreement
- (Financial) administrative data: at least 7 years after recording the data

### Security

I have taken appropriate technical and organizational measures to protect your personal data against unlawful processing.

### Rights concerning your data

You have the right to inspect, rectify or delete the personal data I have received from you (the deletion can be requested after the expiration of the “storage period” mentioned above). In



any case, the right to request any correction or removal does not apply to the findings/conclusions, which are the psychologist's professional responsibility.

- You also have the right to have your data transferred by me to yourself or, by order of you, directly to another party. I will ask you to adequately identify yourself before I can respond to the aforementioned requests.
- You always have the right to withdraw your consent to me to process your personal data in the future without this affecting the lawfulness of the processing of the data collected before the withdrawal.

### Complaints

If you have a complaint about the processing of your personal data, I kindly ask you to contact me about this primarily in hope that we can come to a solution together. You always have the right to file a complaint with the Dutch Data Protection Authority, the supervisory authority in the field of privacy protection.

### Changes to the privacy statement

I can always change this privacy statement. A current version of the privacy statement is published on my website. I and my network of colleagues are also accountable for keeping each other updated on any critical changes.

### Ask

If you have any questions or comments about this Privacy Statement, please contact me.