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# Privacy Statement YINX

## 1. PREFACE

YINX processes the personal data of everyone who follows a coaching trajectory or training with us. We do this in order to offer you the best guidance in your personal development and achieving your goals.

We are aware of the sensitivity of data that you share with us and the obligations that privacy legislation places on us. We are therefore responsible for the attentive handling of your personal data. We pay careful attention to this. In this privacy statement we would like to explain how we do this.

## 2. ORGANIZATIONAL DATA

This privacy statement covers all activities of YINX B.V.

### Contact details organisation

- Bergseweg | 28E | 3633 AK | Vreeland
- General email address : [yinx@yinx-group.nl](mailto:yinx@yinx-group.nl)
- Website : <https://yinx-group.nl/>
- COC-number : 76469093

## 3. PERSONAL DATA, PURPOSE AND PRINCIPLES

YINX processes personal data in order to provide our services. We only do this if there is a specific purpose for the data. For example, we need data to be able to register you for a coaching trajectory or training, to communicate with you or to offer you the right (personal) guidance.

A legal basis is required for the processing of personal data. If you follow a coaching trajectory or training with us, we use the basic *consent*. We will therefore always explicitly ask you for permission to process your data at the start of a trajectory. This also applies in particular to the processing of medical data that we request from you when registering. For example, we ask about any medication use or (previous) treatment by a psychologist or psychiatrist. We need this information to be able to make a proper assessment of your mental state and medical background so that, where necessary, we can take your (medical) situation into account.

For all data we process based on your consent, you always have the right to withdraw or change this consent. If you withdraw or change your consent at a later date, this will not affect the processing that has been done prior to this withdrawal. If you do not want to give permission for the processing of your data, you will unfortunately not be able to follow a coaching trajectory or training with us because the requested data is necessary for the (safe) provision of our services.

A complete overview of the various categories of personal data that we process, and the specific purposes and principles can be found in Appendix 1. Here you will also find the data that we process, for example, of employees we hire and of suppliers. We never process data for purposes other than those stated in this statement.

#### 4. YOUR PRIVACY RIGHT

You have a number of rights when it comes to your personal data. These rights are enshrined in law. You can use the following rights:

1. The right to information: concerns the right to be informed (in advance) about what data is recorded and for what purpose. We do this with this statement, among other things.
2. The right of access: concerns the right to view or receive a copy of the personal data that we process about you.
3. The right to rectification: concerns the right to change the personal data that is processed or the right to supplement or correct incorrect data. For example, if you do not agree with the recorded data after a request for access.
4. The right to be forgotten: concerns the right to have data permanently deleted.
5. The right to restriction of processing: concerns the right to have less data processed. In this case, we will test whether this is possible without negative consequences for the process.
6. The right to data portability: concerns the right to transfer or have personal data transferred. You have the right to transfer the data that we process from you and have received from you to you or to transfer it to another organization at your request. This is possible, for example, if you want to switch to another coach.
7. The right to object (objection): concerns the right to object to (a specific) processing of your data and / or to withdraw a previously given consent.

Do you want to make use of one of your rights? Then you can submit a written request via [yinx@yinx-group.nl](mailto:yinx@yinx-group.nl). The rule of thumb is that if you invoke one of your rights, we will process that request (free of charge) within one month. If that fails, this month may be extended to a maximum of three months.

#### 5. SECURITY

YINX has taken technical and organizational measures to protect your personal data against loss or any form of unlawful processing. The main measures are:

1. Responsibilities have been assigned within the organization in the field of privacy and information security.
2. Only those employees can access the data who also need it for the performance of their work. For example, a careful division has been made as to who may and can see which files. Basically, only people who have a direct relationship with your trajectory can view your data.
3. Employees or persons engaged on our behalf and who have access to personal data are (contractually) bound by confidentiality.
4. IT facilities and files are physically and technically protected against unauthorized access and damage or malfunction.
5. Processing agreements are concluded with all third parties that process data on our behalf, in which agreements are made about access to and security of data.

#### 6. EXTERNAL RECIPIENTS

Some of the data we process is shared with third parties for related purposes. Organizations or agencies with which we share data are:

- Our Accountant
- Our Cloud/ICT provider

Where necessary, we naturally enter into a good data processing agreement (DPA) with other processors.

#### 7. PROCESSING OUTSIDE THE EU

When processing your data, we choose (where possible) for processing within the EEA (European Economic Area). Where that is not possible, we make additional agreements or data is stored in a country of which it has

been determined (by the European Commission) that there is adequate security for personal data. In all cases we enter into a processor agreement.

## 8. RETENTION PERIODS

Retention periods have been determined for all personal data that we process. In principle, data is not kept longer than necessary. We keep data about coaching or training programs for 5 years. Where available, the legal retention periods are applied. For example, a statutory period of 7 years applies to financial data.

## 9. COMPLAINTS AND INCIDENTS

Do you have a question or a complaint about the way we handle your personal data? Please contact us using the aforementioned contact details. In the unlikely event that you cannot reach a solution with us, you can submit a complaint to the supervisory authority, the Dutch Data Protection Authority.

<https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/exercising-your-rights-sis-ii-vis>).

We have also drawn up a protocol for reporting incidents. In doing so, we fulfill the data breach reporting obligation. The handling of these incidents follows a structured process, which also provides for the correct steps regarding the data breach notification obligation.

## 10. COOKIES

### What is a cookie?

A cookie is a simple small file that is sent along with pages from our website [and/or Flash applications] and is stored by your browser on the hard drive of your computer. The information stored therein can be sent back to our servers on a subsequent visit.

### Functional cookies

Functional cookies are cookies that are necessary for our website to function properly, for example for loading images. Our website does not work properly without these cookies, so permission does not need to be given for this.

### Other cookies

With the help of other cookies we can recognize you when you visit our website again. The website can therefore be specially adjusted to your preferences. For example, we can use marketing, statistical or preference cookies. If we process personal data, for example your IP address, with one of these Cookies, we will ask you for permission with a cookie notification. You can also refuse these cookies.

### Delete cookies

Cookies can be deleted via your browser settings.

## Appendix 1: Personal data, purpose and principles

Categories of personal data	Purpose	Principle
<b>Coaching</b>		
Name, first names, initials, title, address, postal code, city, telephone number, e-mail address.	The registration of coachees for a process and the ability to communicate with coachees.	Execution of the service agreement for the execution of coaching programs.
Date of birth	Being able to offer the right guidance or linking to the right coach in view of the age.	Execution of the service agreement for the execution of coaching programs.
Information about the professional and family context of the coachee, such as the CV, career path, original family composition and current living situation of the coachee. In addition, inquiries are made about any previous coaching processes and the experience with them.	Being able to determine the needs and background of the coachee with a view to offering the most suitable route and linking it to the right coach.	Execution of the service agreement for the execution of coaching programs.
Information about current or historical treatment by a psychologist or psychiatrist, general physical health and medication use.	Being able to assess whether the coachee can handle a process physically and mentally, as well as assessing whether the mental state of the coachee or the use of medication presents objections or risks to a process.	Consent
Information about (the progress of the) coaching process. This includes, for example, (digital or paper) notes from the coach, assignments from the coachee and other relevant information about the recording of the trajectory.	Being able to offer the correct guidance and assessment of the progress of the process as well as the regular reporting of conversations.	Execution of the service agreement for the execution of coaching programs.
For the purpose of video conferencing: the IP address, e-mail address, substantive conversations.	Offering a digital communication channel for (part of) the process where coachees do not have to be physically present.	Execution of the service agreement for the execution of coaching programs.
Account number, name and address details.	Being able to invoice the coaching trajectory.	Execution of the service agreement for the execution of coaching programs.
<b>Training</b>		
Name, first names, initials, title, address, postal code, city, telephone number, e-mail address.	The registration of participants for a training program and the ability to communicate with participants.	Execution of the service agreement for the execution of coaching programs.
Date of birth, gender.	Being able to organize groups that consist of an optimal composition in terms of gender and age.	Execution of the service agreement for the execution of coaching programs.
Dietary requirements and any allergy information.	In connection with providing lunches/dinners that are part of the training based on dietary requirements or restrictions.	Consent

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Information about current or historical treatment by a psychologist or psychiatrist, general physical health and medication use and any other relevant medical information.	Being able to assess whether the participant can physically and mentally cope with a training as well as the consideration of whether the mental state of the participant or the use of medication poses objections or dangers to a training.	Consent
Information about (the progress of the) training program. This includes, for example, (digital or paper) notes from the teacher, assignments from the participant and other relevant information about the recording of the training program.	Being able to monitor the progress and development of participants as well as providing the right guidance and training.	Execution of the service agreement for the execution of coaching programs.
Recordings of conversations. These are coaching conversations in which many topics and personal development can be discussed.	Being able to assess the skills and development of the participant and offering targeted training by the teacher.	Consent
Name, address, telephone number, relationship to participant of emergency contacts.	In case of calamities, being able to contact next of kin.	Consent
Account number, name and address details.	Being able to invoice the training.	Execution of the service agreement for the execution of coaching programs.
<b>Website visitors</b>		
Name, first names, e-mail address.	Enable the organization to contact website visitors.	Legitimate interest: The organization must be able to contact you regarding a question.
<b>Newsletter</b>		
Name, first names, e-mail address, telephone number.	Informing about events, programs and training.	Consent
<b>Hiring</b>		
Name, first names, initials, title, address, postal code, city, telephone number, e-mail address.	Being able to draw up and manage the hiring agreement and communicate with hiring employees.	Implementation of the hiring agreement.
Information about the career path (including a CV), courses followed and references.	Being able to determine the expertise of the hiring employee.	Legitimate interest: The organization must be able to assess the expertise of hired personnel.
Account number, name and address details and other (financial) administrative data.	Being able to pay invoices received from hired personnel.	Implementation of the hiring agreement.
<b>Suppliers</b>		
Name, first names, initials, title, address, postal code, city, telephone number, e-mail address.	Being able to draft and manage the agreement and communicate with suppliers.	Execution of the agreement.
Data regarding the financial settlement of products and services such as invoices, contracts, account numbers and VAT numbers.	Being able to pay or invoice for services and products.	Execution of the agreement.  Legal obligation: Law on State Tax, Article 52.