



Privacy Statement Buddy Coaching B.V.

Buddy Coaching B.V. places high importance on safety and quality. A crucial aspect of this is transparency and safeguarding the privacy of (potential) customers and candidates. Therefore, we have formulated and implemented a policy regarding the processing of data, its purpose, and the options available for individuals to exercise their rights as fully as possible. We do this in accordance with the Dutch Data Protection Act and the professional code of the Netherlands Institute of Psychologists.

For all additional information about the protection of personal data, please visit the website of the Dutch Data Protection Authority: <https://autoriteitpersoonsgegevens.nl/nl>

Buddy Coaching B.V. located at 's-Gravelandseweg 73, 1217 EJ Hilversum, is responsible for the processing of personal data as shown in this privacy statement.

Contact Details:

Address: 's-Gravelandseweg 73, 1217 EJ Hilversum

Phone: 06 39440108

Chamber of Commerce number: 91384354

Privacy Officer: The Office Management, reachable via info@buddy-coaching.com

Protection of Your Privacy

Buddy Coaching B.V. ("Buddy") takes the protection of your privacy very seriously. We treat your personal data confidentiality and with the utmost care. This privacy statement applies to all personal data collected and used by Buddy.

Within all processes of our organization, we handle personal data and customer information very carefully; the principles as set out in the General Data Protection Regulation (GDPR) are our basis, as well as the professional codes to which Buddy adheres. This means that Buddy:

- Informs you in a comprehensible and transparent manner about how and for what purposes the personal data is processed;
- Processes personal data only for legitimate and well-defined purposes and bases the data processing on one of the grounds mentioned in the GDPR;
- Takes appropriate organizational and technical security measures to protect personal data;
- Informs you about your rights regarding the personal data processed by Buddy;
- Does not process more or longer than necessary.

Personal Data We Process

Buddy only processes regular personal data.

- Buddy processes the following data from customers: contact details, proposals, quotations, invoices, structured and unstructured notes containing analyses and advice about individuals. Based on the grounds of: 'performance of the contract' and 'consent'.
- Buddy processes the following data from employees: contact details, financial data, and work-related data. Based on the grounds of: 'consent'.
- Buddy processes the following data from website visitors: technical, functional, and anonymized analytical cookies. Based on the grounds of: 'consent'.

- Buddy processes data for mailing newsletters to interested parties/contacts. Based on the grounds of: 'consent' through active registration by ticking a box.

On What Grounds and for What Purpose We Process Personal Data

Buddy uses your data only when there is a legal basis for doing so within the context of providing products or services to you. If and when Buddy processes your data in any other way, it requires your (explicit) consent.

To process personal data, we rely on the legal grounds of 'execution of the agreement', 'legitimate interests', and 'consent'. The legitimate interest is that there is a relevant and appropriate relationship between the data subject and the data controller because the data subject is our customer. The processing of data is necessary and it is reasonably expected that the data may be processed for that purpose (Ground 47 GDPR).

Processing Purposes:

Provision of (pre-)contractual services

Buddy processes your personal data to provide services to you. This includes making a proposal at your request, executing the agreement, maintaining the relationship with you regarding the assignment, processing and confirming an enrollment assignment, or sending an invoice. Data processing is necessary for the execution of the agreement. This is based on the legal ground of 'execution of an agreement'.

Preparation and sharing of assessment reports

Buddy processes questionnaires, test results, and behavioral observations to prepare an assessment report. It is in our legitimate interest to process your data (e.g., name, function) for this purpose. To share the report with the client, we ask for your consent. This is based on the legal ground of 'consent'.

Involvement of and sharing with third parties

Buddy may engage other parties to perform a part or aspect of the service for you; this may include, for example, an external consultant, trainer, or assessment psychologist, or an external questionnaire or test as part of the assessment, or an ICT system or platform with which we provide our services, such as a CRM system or e-learning platform. To the extent that these third parties need access to personal data to perform these services, Buddy has taken the necessary measures to ensure that your data is processed correctly by them.

Sharing for legal reasons

We may share your personal data with third parties if we believe that access to and use of the personal data is reasonably necessary to (i) comply with applicable laws, regulations, and/or court orders; (ii) prevent or detect fraud, security, or technical issues; and/or (iii) protect the interests, properties, or safety of Buddy, our users, or the public as far as is consistent with the law.

Marketing and sales activities

Buddy informs customers about offers, innovations, and other relevant (professional) content related to our services in accordance with applicable regulations or because you have given explicit consent for this. We may do this by phone, email, newsletters, or direct personal contact. You always have the right to indicate that you no longer wish to receive such information.

Data Processing on the Buddy Website

We collect and use your personal data on our website to provide you with (personalized) web content and to communicate with you as targeted as possible. Your data is also used for research and analysis to improve our services and websites. We may also use data entered on our websites to send you



information about other Buddy services by email, provided you have given your consent. You can withdraw this consent at any time.

Scientific Research

Anonymized personal and test data may be used by Buddy for the validation and normalization of tests, as well as for benchmarking purposes and statistical analyses. The data is protected with additional security measures. We will first ask for your consent to store this personal and test data.

Once your data has been anonymized, you can no longer have it removed from our database as anonymized data no longer constitutes personal data.

Organizational Advice

Buddy aims not only to provide tailored personal support but also to ensure that the organization (client) learns and develops. Thus, we help both the individual and work on improving the work climate. Confidentiality is our highest priority and a prerequisite for coaching. We never ask the coach about what was discussed with the coachee and never feedback personal information. On a broad level, we can extract anonymized information from (evaluation) forms completed by the coachee. We also ask the coach about signals and themes concerning the organization.

To provide the organization with advice on improving the work climate, we give insight into general trends within their staff. We only provide information from a minimum of 15 coachees per organization. We emphasize that the employer does not learn what the coachee discussed with the coach. What we do feedback is 'how many people in the organization are working on which themes?' and 'what themes or signals about improvement opportunities at the organizational level do we hear often?'. This feedback is only used to advise on improving the work climate. The trends and data are not traceable to the individual coachee. Again, the confidentiality of coaching has the highest priority.

How Long We Retain Personal Data

Buddy does not retain your personal data longer than is strictly necessary to achieve the purposes for which your data is collected. We generally apply the following retention periods:

- Contact details: 2 years
- Unstructured notes: 2 years
- Structured notes such as in proposals, evaluations, and advice: 2 years
- Archived anonymized personal data and test results: as long as necessary for scientific research.

For a specific breakdown of which ground applies to which data, you can contact our Privacy Officer; the Office Management via info@buddy-coaching.com.

Your Rights

You have the right to request:

Access to your personal data

You can ask us whether we process personal data about you. If we do, we will explain which personal data we process, how we do this, and for what purposes. You can also request a copy of the personal data we process about you.



Rectification of your personal data

If you believe that the personal data we process about you is incorrect or incomplete, you can request us to supplement or modify your data.

Erasure of your personal data

You can request us to erase the personal data we process about you. We will erase your data without unreasonable delay if: The data is no longer necessary for the purpose for which we processed it; You withdraw your consent if that was the basis for processing; The data was processed by us in the context of direct marketing; You object to the processing and there is no reason why we should continue to process the data; There is a legal reason to erase the personal data.

Restriction of the processing of your personal data

In some cases, you may want a restriction on the processing of your personal data. You can request us to limit the data processing. We will comply with such a request if, upon investigation, this is possible, for example, if you do not want all your data to be erased but no longer need certain data for the original purpose.

Transfer of Your Personal Data (Data Portability)

You can request us for a copy of the personal data we process about you. You can also express your right to object if you disagree with our processing of your data.

You can submit a request for access, correction, deletion, restriction, or data transfer of your personal data, or a request to withdraw your consent or object to the processing of your personal data via info@buddy-coaching.com addressed to the Office Management. We will respond to your request as quickly as possible, but no later than within four weeks. If we cannot fulfill your request within four weeks, we will respond within four weeks of submission that we need an additional two months to handle your request.

Sharing Personal Data with Third Parties

Buddy does not sell your data to third parties and only provides it if necessary for the execution of our agreement with you or to comply with a legal obligation. These recipients are: the freelancers who perform work on our behalf and/or your supervisor/management who is the client. Additionally, data from internal staff may be shared with ArboNed, our insurers, the accountant, the bank, the tax authorities, and the pension fund.

We enter into a data processing agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality of your data. Buddy remains responsible for these processes.

Automated Decision-Making

Buddy does not make decisions about matters that can have significant consequences for individuals based on automated processing. This means decisions made by computer programs or systems without human intervention (e.g., a Buddy employee).

Protection of Children's Privacy

Our website and/or service does not intend to collect data about website visitors under the age of 16 unless they have permission from parents or a guardian. However, we cannot verify if a visitor is over 16 years old. We recommend that parents be involved in their children's online activities to prevent data from being collected without parental consent. If you believe that we have collected personal

information about a minor without such consent, please contact us at info@buddy-coaching.com, and we will delete this information.

Cookies or Similar Technologies We Use

A cookie is a small text file stored on your computer, tablet, or smartphone when you first visit this website. Buddy only uses technical and functional cookies and analytical cookies that do not infringe on your privacy. The cookies we use are necessary for the technical operation of the website and your convenience. They ensure that the website works properly and, for example, remember your preference settings. They also help us optimize our website.

When you visit our website, a banner appears informing you about the use of cookies. By continuing to use our website, you accept the use of these cookies. Your consent is valid for a period of thirteen months.

We use the following types of cookies on our website:

- Functional cookies: such as session cookies to track session information;
- Anonymized analytical cookies: to gain insight into website visits based on visitor numbers, popular pages, and topics. This way, we can better align our communication and information with the needs of website visitors. We cannot see who visits our websites or from which PC the visit occurs.

Questions, Requests, Complaints, and Supervision

Buddy takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized modification. If you believe that your data is not properly secured or there are indications of misuse, please contact us.

The Dutch Data Protection Authority (AP) is the Dutch supervisory authority that monitors compliance with the GDPR. You have the right to file a complaint with the AP if you believe your rights have been violated. You can find a point of entry for this on the website of the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

Buddy reserves the right to amend this privacy policy. Updated versions will be published on our website with the date.

This privacy policy was last updated in September 2023.