

## **Privacy statement Sharing Perspectives Foundation**

**August 3<sup>rd</sup>, 2018**

### **Introduction**

SPF takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at [info@sharingperspectivesfoundation.com](mailto:info@sharingperspectivesfoundation.com).

**For all activities relating to the Erasmus+ Virtual Exchange project in which the Sharing Perspectives Foundation is involved, we handle personal data according to the Erasmus+ Virtual Exchange Privacy Statement of the European Commission.**

[Click here to view the Erasmus+ Virtual Exchange Privacy Statement.](#)

### **Who is SPF?**

SPF is the stichting Stichting Sharing Perspectives, with registered office at (1054 AN) Amsterdam listed at the Traderegister of the Dutch Chamber of Commerce under 56446799.

SPF is as the controller ultimately responsible with regard to the processing of your personal data.

### **How does SPF use your personal data?**

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data SPF uses for that specific purpose, the legal justification, and the amount of time SPF keeps this data. For clarity's sake, we have categorised the purposes.

*Services, customer management and financial administration*

Purpose:            Services

Information: Home address, Email, Customer file data, Data necessary to provide the service, Data generated by the service

Legal basis: Consent

Storage period: maximum 5 years

Purpose: Handling complaints

Information: Home address, Email, Customer file data, Data necessary to provide the service, Data generated by the service

Legal basis: Consent

Storage period: maximum 5 years

Purpose: CRM

Information: Name, Username, DoB, Email, Phone, Profile photo

Legal basis: Consent

Storage period: maximum 5 years

Purpose: Job application

Information: Name, Username, DoB, Email, Phone, Profile photo

Legal basis: Legitimate interests

importance: Commercial interests

Storage period: As long as necessary for this purpose

*Marketing*

Purpose: Newsletter  
Information: Name, Email Consent  
Legal basis: Consent  
Storage period: maximum 2 years

Purpose: Retargeting  
Information: Name, Email Consent  
Legal basis: Consent  
Storage period: maximum 2 years

*Website*

Purpose: Account  
Information: Name, Email, Username, Password, User ID, Message content  
Legal basis: Consent  
Storage period: maximum 5 years

Purpose: Submitting reviews or messages  
Information: Name, Email, Username, Password, User ID, Message content  
Legal basis: Consent  
Storage period: maximum 5 years

*Research and Development*

Purpose: Scientific research

Information: Name, Email, Behavioural data

Legal basis: Consent

Storage period: maximum 5 years

### **How did we obtain your personal data?**

SPF has obtained your data because you have provided this data to us.

### **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

#### **Access**

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data SPF has obtained about you, you may exercise your right of access by submitting a request to SPF.

#### *Making changes*

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that SPF makes these changes for you. You may request that SPF modifies, corrects, supplements, erases or shields your information.

#### *Restriction of processing of personal data*

You also have the right, under certain conditions, to ask SPF to restrict the processing of your personal data.

#### *Right to object*

If processing of your data takes place on the grounds of 'legitimate interest' by SPF or a third party, you have the right to object to that processing.

### *Portability of data*

You have the right to obtain your personal data from SPF. SPF will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

### *Withdrawing consent*

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in SPF no longer being able to provide you with certain services.

### *Response from SPF*

A request can be sent to [info@sharingperspectivesfoundation.com](mailto:info@sharingperspectivesfoundation.com). SPF will comply with your request as soon as possible and in any case no later than one (1) month after SPF has received such a request. If SPF rejects your request, we will indicate in our reply why the request was rejected.

### *Recipients of your personal data*

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfilment of an agreement between you and SPF
- External consultants

It is possible that SPF is required to submit your data to a third party, for example to fulfil a legal obligation.

### **Transfer to third countries or international organisations**

It may be necessary, for instance for technical and operational reasons, to transfer your (personal) data to affiliates of SPF located outside the European Economic Area. Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, SPF will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible. If that is not possible, SPF will ask your consent to transfer your (personal)

data to countries that do not maintain an adequate protection level. You may withdraw your consent at any time.

### **Can changes be made to this Privacy Statement?**

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

### **Questions, remarks, and complaints**

If you have any questions regarding this Privacy Statement or the way in which SPF uses your data, you can send an e-mail to [info@sharingperspectivesfoundation.com](mailto:info@sharingperspectivesfoundation.com). If you have a complaint about the way your data is processed, please send an e-mail to [info@sharingperspectivesfoundation.com](mailto:info@sharingperspectivesfoundation.com). Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the Autoriteit Persoonsgegevens.