



# PRIVACY STATEMENT

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**CCS - Cross Cultural Solutions**

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# PRIVACY STATEMENT

Sometimes, when you are active on my website or contact me, you are sharing personal data with me. I handle this data with care and observe the applicable laws and regulations. These laws and regulations regulate the storage and use of your personal data. In this privacy statement I explain what data I collect from you and what I do with this data. This privacy statement applies to all interactions between you and CCS, regardless of the means of communication.

CCS – Cross Cultural Solutions (hereafter CCS), having its registered office at Nijmegen, is the controller of personal data as referred to in this privacy statement. Any questions or comments regarding your privacy can be sent to [info@cocohofs.com](mailto:info@cocohofs.com).

## **WHAT IS PERSONAL DATA?**

Personal data is any data that tells us something about you and can be used to identify you. This is, for example, your name, your contact or address details and your Citizen Service Number. Some of this data, such as ethnic origin, religion or a criminal record, is understood to be special personal data.

## **SPECIAL PERSONAL DATA**

I do not collect any special personal data.

## **PERSONAL DATA OF PERSONS UNDER 16 YEARS OF AGE**

I do not intend to process personal data of persons under 16 years of age. However, I cannot verify whether a visitor to my websites and servers is over 16. If you are convinced that I have collected personal data from a minor without parental or guardian permission, please contact me via e-mail and I will delete this information, if possible. If I collect data from persons under 16 years of age, I will always do so with the consent of their parent or guardian.

## WHEN DO I PROCESS YOUR PERSONAL DATA?

### **1. To be able to help you if you have any questions.**

I will be happy to help you if you run into something or want to ask me something. You can call me, email me or fill in a form on the website. I may also receive your data through a third party in connection with my services. To be able to help you further I store some of your data. It enables me to know who you are and retrieve what we talked about the next time we are in touch.

If you ask me any questions, I will store the following data from you:

- Name
- E-mail address
- Your message

*Legal basis: legitimate interest*

### **2. To prepare an offer and send it to you.**

Before I start working for you I can send you an offer. For this purpose I will store the following data from you:

- Name and address
- E-mail address
- Telephone number
- Company name (optional)
- Chamber of Commerce registration number (optional)
- VAT-ID number (optional)

*Legal basis: legitimate interest*

### **3. To execute an agreement and draw up an agreement, to contact you for introductory talks, to make notes and/or recordings of coaching talks, to draw up advisory reports, to make appointments with you, to send you parcels with (teaching) materials and to send you an evaluation form afterwards.**

If you use my services, of course you want to be helped and receive what you asked for. I store the following data for the execution of an agreement:

- Name and address
- E-mail address
- Telephone number
- Any other (personal) data provided by you

*Legal basis: execution of the agreement*

#### **4. To be able to invoice you and for debt collection.**

Of course, the services you use must also be paid for. If (timely) payment is not made, I am within my rights to start a debt collection process. In connection with invoicing and debt collection, I will store the following data from you:

- Name and address
- E-mail address
- Telephone number
- Company name (optional)
- Chamber of Commerce registration number (optional)
- VAT-ID number (optional)

*Legal basis: legal obligation*

#### **5. To keep you informed of changes in my services.**

If I make any changes to my services, general terms and conditions, privacy statement or other important matters, I will want to inform you. If you agree, I will use the following data to process your data in my newsletter system:

- Name
- E-mail address

*Legal basis: execution of the agreement*

#### **6. To send you my newsletters.**

If you have informed me that you wish to receive my newsletters, I will store the following data from you:

- Name
- E-mail address

*Legal basis: permission*

#### **7. To sign up for workshops, lectures and/or master classes and to send you information about my webinars and (online) services.**

If you have signed up for a workshop, webinar, master class or online service, I will send you additional information (dates, times etc.). If you agree, I will store the following data from you:

- Name
- E-mail address

*Legal basis: execution of the agreement*

### **8. To share your review on my website and/or social media.**

If you have provided me with a review, I will publish it on my website and/or social media channels. If you agree, I will store the following data from you:

- Name
- Company name (optional)
- Job title / profession

*Legal basis: permission*

### **Cookies and similar techniques we use**

CCS uses functional, analytical and tracking cookies. A cookie is a small text file that is stored on your computer, tablet or telephone when you first visit a website. I use cookies with a purely technical functionality so that the website works as intended. In addition, I use analytical cookies such as Google Analytics to study the behaviour of my visitors and to improve my website accordingly.

Last but not least, I also sometimes use tracking cookies (Facebook pixel) so that I can offer you tailor-made content and advertisements. These include advertisers and social media companies.

If I need your permission to place cookies, I will ask you for it during your first visit to my website. I then also refer you to my cookie statement. You can opt out of cookies by configuring your internet browser so that it does not store any more cookies.

### **Transfer to partners**

For the execution of my services I cooperate with various suppliers and partners. These suppliers and partners include parties, who:

- send my newsletters (Active Campaign)
- take care of my webhosting and e-mail (SolidWP)
- keep my books (Kees de Boekhouder)
- ship my parcels (DHL)
- take care of my webinars (Zoom, Google Meet, Microsoft Teams)
- take care of my online calendar (Calendly, Google Calendar, Microsoft Bookings)
- take care of my online community (Facebook)
- take care of my online meetings (Zoom, Google Meet, Microsoft Teams)
- is my virtual assistant (Lizanne van Esch)
- other software I use (Trello, Excel, WhatsApp, Voxer, Google Drive, Google Forms, SharePoint, Buffer, Typeform, Microsoft 365)

I have concluded processing agreements and/or non-disclosure agreements with sub-processors to ensure the security of your data. I only work with partners who can comply with the GDPR.

Some of my partners are located outside the European Economic Area (the countries within the European Union, Liechtenstein, Norway and Iceland). Your data may be processed in the United States and/or other countries where these companies have their cloud storage and servers and/or backups.

I have agreed appropriate measures with these partners which are laid down in a processing agreement/Data Processing Addendum or in a model agreement of the European Commission ([click here](#)). Most of them have already signed and put into effect the stricter GDPR. This is how I ensure that your data is properly protected.

### **Transfer to third parties**

In principle, I do not share your information or sell it to individuals or organisations outside CCS, except when it concerns partners as described above. Additionally, I may be obliged to transfer your data pursuant to a statutory duty.

### **The security of your data**

CCS has appropriate technical and organisational security measures in place to protect your personal data from misuse, unlawful or unauthorised use and loss.

All parties who process your data for me (sub-processors) or can inspect it (e.g. employees or temporary workers) sign a processing agreement or a non-disclosure agreement. These agreements and associated data are kept for as long as I work with these parties.

### **How long will your data be stored?**

I use different storage periods for different data flows. Of course you always have the right to ask me to delete your data. More information can be found under the heading "Your rights".

### **Personal data:**

Name, address details, telephone number and e-mail will be deleted two years after our last contact.

### **E-mail:**

Any e-mails older than two years will be deleted unless they are still relevant to the execution of an agreement or the resolution of a dispute.

**Invoices and offers:**

Invoices and offers can be removed after the legal retention period of seven years. Until then your data will in any case remain in my invoicing system.

**Newsletter:**

You can remove your data from my newsletter system at any time.

**Your rights**

You have the right to inspect, correct and delete your personal data. In addition, you have the right to withdraw your permission to process the data or to object to CCS processing your personal data. You also have the right to data portability. You can send a request for inspection, correction, deletion or transfer of your personal data or a request to withdraw your permission or your objection to the processing of your personal data to [info@cocohofs.com](mailto:info@cocohofs.com).

To make sure that the request for inspection has been made by you, I will ask you to enclose a copy of your identification with the request. Black out your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and Citizen Service Number (BSN) in this copy to protect your privacy.

If your request concerns a cookie, I ask you to include your ID as well. I will respond to your request as soon as I can, but no later than within four weeks. CCS also wishes to point out to you the possibility to file a complaint with the national supervisory authority, the Dutch Data Protection Authority.

**Reporting a data breach**

If, despite all precautions, a data breach should occur, I will comply with the obligation to report data breaches and, if necessary, will report this breach to the Dutch Data Protection Authority within 72 hours after its detection. If you should discover a data breach, I kindly ask you share this information with me as soon as possible but in any case within 24 hours after you detected the data breach by sending me an email. I will then be able to take immediate action.

**Liability**

This privacy statement relates only to the personal data that CCS processes for the purposes mentioned in this agreement. CCS does not accept any responsibility or liability for (the functioning and/or content of) websites or services of third parties.

### **Amendments to this statement**

CCS may amend the content of this privacy statement at any time in response to new legal or regulatory developments or changes within my company. You can subscribe to my newsletter in which I will keep you informed of any changes.

In any case, I advise you to frequently consult my privacy statement in order to stay informed of my privacy policy. You agree to these amendments by the continued use of CCS's services.

### **Contact**

If you have any further questions or comments, please contact me by e-mail, [info@cocohofs.com](mailto:info@cocohofs.com), or by post to:

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CCS is registered with the Chamber of Commerce under file number 84336080.  
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