

PRIVACY STATEMENT Praktijk voor Psychologie

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M.D. Pulles-Hendriks, established in Nijmegen and registered with the Chamber of Commerce under number 09207414, highly values the protection of personal data. This privacy statement explains how practice holder and self-employed persons (ZZP-ers) working at Praktijk voor Psychologie (as stated on the website), hereinafter jointly referred to as "Praktijk voor Psychologie", deals with information about identified or identifiable natural persons, as referred to in the General Data Protection Regulation (GDPR/AVG).

1. Application

This privacy statement applies to the following categories of natural persons of whom Praktijk voor Psychologie processes personal data:

- a. (potential) patients;
- b. visitors to the practice of Praktijk voor Psychologie;
- c. visitors to www.praktijkvoorpsychologie.net;
- d. participants in meetings of Praktijk voor Psychologie;
- e. applicants;
- f. all other persons who contact Praktijk voor Psychologie or of whom Praktijk voor Psychologie processes personal data, with the exception of its employees.

2. Processing of personal data

Praktijk voor Psychologie processes personal data:

- a. personally provided by the person concerned (during a meeting or discussion), by telephone, or digitally (via e-mail or web forms on the website), such as contact details or other personal data;
- b. that was obtained from other care providers or referrers with the permission of the person concerned;
- c. that was generated during a visit by a person concerned to the website of Praktijk voor Psychologie, such as IP address, the surfing behavior on the website (such as data of the first visit, previous visit and current visit, pages accessed and the way in which the website was navigated) and items clicked by the person concerned;
- d. when the person concerned provided written approval for recordings by camera during visits for use during supervision, peer review and other peer consultation sessions. The recordings are destroyed after use;
- e. which the person concerned provided digitally via applications for e-health (Therapieland), such as contact details or other personal and data treatment data;
- f. when the person concerned has provided personal digital data him/herself via zorgmail or on own initiative of the person concerned via regular email or on paper. This information is processed and stored in the EPD, Intramed.

3. Purposes processing

Praktijk voor Psychologie will process personal data for the following purposes:

- a. the execution of medical treatment contracts and invoicing of services performed;
- b. maintaining contact, invitations for meetings and information requested by the person concerned;
- c. improving the practice website www.praktijkvoorpsychologie.net;
- d. tracking user statistics. User statistics of the website provide information about the number of visitors, the duration of their visits, which parts of the website are accessed and the click behavior. It concerns generic reports that are non-personally identifiable;

- e. monitoring access to practice and protecting confidential data.

4. Legal basis

Praktijk voor Psychologie processes personal data on the basis of one of the following legal grounds:

- a. consent of the person concerned. This permission can always be withdrawn, but withdrawal will not affect the lawfulness of the processing on the basis of the permission before the withdrawal;
- b. execution of or with a view to the conclusion of medical treatment agreements, including invoicing to third parties, such as the health insurance company and the like;
- c. legal obligations, such as the obligation to keep medical records or to register BSNs;
- d. a legitimate interest, such as the use of contact information for sending invitations for a meeting.

5. Processors

Praktijk voor Psychologie may use service providers (processors) for the processing of personal data who will only process personal data according to instructions from Praktijk voor Psychologie. Praktijk voor Psychologie will conclude a processor agreement with processors that meets the requirements of the General Data Protection Regulation (GDPR/AVG).

6. Share personal data with third parties

Praktijk voor Psychologie will share personal information with third parties, if this is indicated in the context of the treatment (for example a referral) or if necessary to comply with legal obligations. Praktijk voor Psychologie will not share personal data with third parties for commercial purposes, unless meetings are organized together with another organization. In that case, only the required contact information will be shared.

7. Transfer outside the EEA

Praktijk voor Psychologie does not, in principle, transfer personal data to countries outside the European Economic Area (EEA). If this should nevertheless be necessary, Praktijk voor Psychologie ensures that the transfer will only take place if the European Commission has indicated that the relevant country provides an adequate level of protection or if there are appropriate safeguards within the meaning of the General Data Protection Regulation (GDPR/AVG).

8. Storage of data

Praktijk voor Psychologie will not store any personal data longer than necessary. In principle Praktijk voor Psychologie will use the following retention periods:

- a. medical data: at least 15 years after the end of the treatment agreement;
- b. (financial) administrative data: 7 years after recording the data;
- c. data of employees and freelancers, other than (financial) administrative data: 5 years after termination of employment or after the end of the assignment agreement;
- d. details of applicants: 6 months after completion of the application procedure;
- e. visitors to the website: 5 years after the last visit to the website, unless an objection is made in which case the data will be deleted.

9. Changes to privacy statement

Praktijk voor Psychologie may change this privacy statement at any time. An up-to-date version of the privacy statement will be published on the website of Praktijk voor Psychologie. It is advisable to consult this privacy statement regularly so that you are aware of any changes.

10. Rights, questions and complaints

You have the right to request Praktijk voor Psychologie to view, rectify, delete, transfer, limit processing and to object to processing. You can contact Praktijk voor Psychologie by sending an e-mail message to info@praktijkvoorpsychologie.net.

For questions or complaints about the way in which Praktijk voor Psychologie processes personal data, you can also contact Praktijk voor Psychologie by sending an e-mail message to info@praktijkvoorpsychologie.net. We will try to resolve complaints satisfactorily. If no satisfactory solution is reached, you can contact the Dutch Data Protection Authority (AP).