

PRIVACY POLICY

Date last modified: 01-06-2022

The Dutch text of this Privacy Policy (Dutch: 'Privacyverklaring 01-06-2022') is the authentic text and shall prevail over any translations of this Privacy Policy.

Child Development is a paramedical practice for Occupational Therapy and Educational/Child Psychology registered as Child Development OT B.V. (KVK 85588156) and Child Development Psychology B.V. (KVK 85587842).

Your privacy is important to Child Development; your trust is of the utmost importance to us.

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. In The Netherlands, GDPR is transposed in local law as the 'Algemene Verordening Gegevensbescherming' (AVG). Under this Act, an organization that processes personal data has certain obligations and the data owner has certain rights. In addition to this general EU law, specific local Dutch rules apply to privacy in healthcare. These rules are stated, among others, in the 'Wet Geneeskundige Behandeling' (WGBO).

In this privacy policy we inform you on the policy we use regarding the collection and processing of your personal data.

1. Definitions

Personal data:	all information with which you directly or indirectly can identify a natural person, in particular by reference to an identifier such as a name, an identification number. Special categorised personal data is for example medical data.
Processing:	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (article 4, clause 2, GDPR 2016/679).
Processor:	means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.



2. Personal Data

In our practice, various personal data of you and/or your child can be processed. Your personal data will only be processed by Child Development for the purposes described in this Privacy Policy and in accordance with the AVG and the WGBO.

3. Collection of personal data

3.1 Patient Care

Child Development collects personal data to meet your demand for care and related activities (for example, financial administration and invoicing) and obligations (for example, medical record keeping). The personal data are provided by you as a client or as a representative of a child. In addition, data from school staff (for example, teacher, student support department) and/or other specialists (for example, home doctor, paramedic, school psychologist) may be necessary for the treatment of the client. You agree to the above by means of accepting the terms and conditions, unless required/permitted on legal grounds.

3.2 Applications

If you apply for a vacancy at Child Development, you might provide personal data including a description of your education and your work experience.

3.3 Website Visit

Child Development may also collect information regarding the use of our website. For this we use various techniques. For example, if you visit our website, Child Development may record certain information that is sent to us by your browser, such as your IP address, the type of browser you use and the language and the time of your visit. In addition, we may then collect information about the pages you view within our site and about other actions that you perform while you visit us. In addition, Child Development can use techniques to determine whether you have opened an e-mail and whether you clicked on a certain link in an e-mail. By recording information in this way, we can collect data about the use and effectiveness of our website and our software products.

4. Processing of personal data

Unless we have obtained your specific permission, your personal data will not be processed for any purpose other than that for which you provided this to us. We use your personal information for the following purposes:

- Provide assessment/therapy services and related activities.
- Comply with legal obligations.
- Applications.



4.1 Provide assessment/therapy services and related activities

This is necessary to provide you and/or your child adequate care. In addition to the treating therapists a limited number of people may have access to your client file. These are, for example, other physiotherapists in the practice, possible trainees and administrative staff. All these persons have a duty of confidentiality and will only inspect the file when necessary.

In order to increase the effectiveness of the treatment and thus to best serve your request for help, we regularly work in a school specialist team. Necessary recommendations and relevant information could be shared with the specialist team involved in the assessment/therapeutic process of your child. This team regularly consist of the teacher, speech and language therapist, student support department, school psychologist and/or school doctor. If you do not want Child Development to process information with any of the above-mentioned parties, please inform Child Development separately by e-mail.

In addition, personal data is processed for activities directly related to the services delivered by Child Development, such as:

- Financial administration and
- Invoice handling for services provided.

4.2 Complying with legal obligations

Child Development may be obliged to process your personal data to comply with legal obligations.

- Record keeping of client data in an Electronic Patient Record (EPD).
- Quality controls/audits.
- Exchange with insurers and municipalities.
- Child protection policy (Dutch: 'Meldcode kindermishandeling').

4.3 Applications

If you apply for a job at Child Development or if you respond to a vacancy, you may provide information about yourself, such as your Curriculum Vitae. We can use this information within Child Development to process your application or to respond to your application. Unless you request us not to do this, we can keep this information on file.

5. Your Permission

Child Development may process your data and/or the details of your child because we ask for your permission through this Privacy Policy. Without your permission to process your data, we cannot initiate the therapy. We will not process your data without your permission unless this is required on legal grounds.



6. Sharing and transfer of personal data

Unless it is necessary to comply with your request, (i) for our professional and legitimate purposes, (ii) if required or permitted by law, (iii) professional standards or (iv) quality rules, we do not share personal data with third parties. For example, in some cases Child Development may share client information with external companies or service providers that work on our behalf in order to comply with your requests (for example, for invoice handling). Only information relevant for the purpose will be shared.

Child Development may also store personal data in a country other than where you are established or resident. The transfer by Child Development of personal data to foreign countries takes place in accordance with Dutch privacy legislation, including the AVG.

Child Development must also disclose personal information if this is required by law, a court order or a government decision.

Child Development will not sell personal data to third parties. Child Development will not pass on any of your information to third parties for marketing purposes.

7. Security

Child Development reasonably implements physical, administrative and technical security measures to protect your personal data against unauthorized access, unauthorized use and unauthorized disclosure. For example, we encrypt certain sensitive personal data, such as digital files that contain personal data.

All employees within Child Development have committed themselves to confidentiality with your personal data.

If we engage external service providers or other third parties who have access to personal data of our clients, we will conclude a (sub) processor agreement with that party. We work with third parties that meet our security requirements.

Child Development also has personal data protected against data leaks. For the reporting of a data breach Child Development has a procedure in accordance with the legal obligation to report data leaks.

8. Retention Period

Child Development does not store your personal data longer than required for the purposes described earlier, unless the law or professional rules oblige us (e.g. for the purpose of holding a record). Your personal data or the personal details of your child are not kept longer than necessary for proper care. For medical data, this retention period is in principle 15 years (from the last treatment), unless longer storage is necessary. This is at the discretion of the practitioner.



9. Data protection and integrity

Child Development has security policies and procedures to protect personal data against unauthorised loss, misuse, alteration or destruction. However, despite the far-reaching efforts of Child Development, the integrity of the data cannot be absolutely guaranteed against all threats.

To the best of our ability, access to your personal data will be strictly limited to those who are involved on behalf of Child Development in the care provision and who are otherwise entitled to do so within the framework of the privacy legislation.

Individuals who have access to personal data are obliged to maintain the confidentiality of such information. We also make every effort to ensure that your personal data are only retained for as long as necessary and that this is required by law, or until you request the removal of your personal data.

10. Links to other websites

Please be aware that the Child Development website may link to other websites, including websites maintained by other companies that are not governed by this Privacy Policy, but by other privacy policies that may vary. We encourage you to review the privacy policy of each website you visit before providing personal information.

11. Changes to Privacy Policy

Child Development may change this Privacy Policy from time to time. When we make changes to the Privacy Policy, we will revise the 'date last modified' at the top of the first page. We encourage you to regularly review the Privacy Policy to keep you informed of how Child Development protects your personal information.



12. Exercise of rights

The information that Child Development collects from you/ or your child is personal. You therefore have the following rights:

- The right to know whether and which personal data of you and/or your child are being processed.
- The right to inspect and receive a copy of this data (in so far as the privacy of another person is not harmed by this).
- The right of rectification or erasure of data in case necessary.
- The right to request (partial) erasure of medical data. This can only be accommodated if (i) the retention of the data for another is not of considerable importance and (ii) the data must not be retained on the basis of a statutory regulation.

If you wish to make use of your rights, you can notify Child Development in writing, via admin@childdevelopment.nl, of your request for inspection of improvement, supplementation, removal or blocking. A request from minors who have not yet reached the age of 16 is done by their legal representative.

The request shall be answered in writing as soon as possible, but no later than one month after submission. Child Development takes care of a proper determination of the identity of the applicant.

Every first request can be submitted free of charge. Child Development can decide to charge an administrative fee to the applicant for each additional request.

Question or complaint

Do you have a question or a complaint? For example, with whom we share data or how we treat your medical data? Then Child Development is more than happy to discuss this with you. You can contact the treating therapist or send an email to: admin@childdevelopment.nl

