

The Dutch version of these terms and conditions is the legally binding version

Summary

- We use your data only for care, quality/safety, and legally required administration.
- We never share data for marketing and never with others without necessity or your consent.
- We keep your medical file for 20 years in principle.
- You have the right to access, correction, restriction, objection, portability, erasure, and withdrawal of consent.
- Questions or concerns? Email: admin@childdevelopment.nl

1 Who we are (data controller)

This privacy statement belongs to Child Development, a paramedical practice for occupational therapy and (ortho)pedagogical/psychological care, consisting of:

- Child Development OT B.V. (KVK 85588156)
- Child Development Psychology B.V. (KVK 85587842)

For questions, contact Jantien Knoester at: admin@childdevelopment.nl

2 Law and regulation

Child Development processes personal data in accordance with Dutch and European legislation. The main applicable laws are:

- **General Data Protection Regulation (GDPR / AVG):** European privacy law governing personal data processing and data subject rights.
- **Medical Treatment Contracts Act (WGBO):** Regulates rights and obligations of clients and healthcare providers, including record-keeping, confidentiality, and retention of medical/psychological data.
- **Quality, Complaints, and Disputes in Healthcare Act (Wkkgz):** Requires safe, high-quality care and regulates complaints, incidents, and disputes.
- **Healthcare Providers Admission Act (Wtza):** Sets transparency, supervision, and governance requirements for healthcare providers.
- **Mandatory Reporting Code for Domestic Violence and Child Abuse:** Requires compliance with the national reporting code, which may involve data sharing with authorized agencies when necessary.

3 Who this policy applies to

- (Legal) representatives and clients (children, adolescents, adults)
- Individuals in the client's support system (parents/caregivers)
- Referrers and partners (e.g., schools)
- Job applicants
- Website visitors

4 What personal data we process

4.1 Client Care

- Identification: name, address, contact info, date of birth, sex, BSN
- Medical/psychological file: referral, intake/anamnesis, observations, tests and measurements, treatment plan, progress notes, correspondence, evaluations, reports
- Insurance/financing: insurer/policy, municipal authorizations, performance codes
- Communication: appointments, emails/phone notes, consent forms

4.2 Quality, safety and legal obligations

Record-keeping (WGB0), incident reporting (Wkkgz), internal quality records, audits (e.g., IGJ), Wtza reporting and supervision

4.3 Financial administration

Name/address, invoice/payment data, insurance information, debtor administration

4.4 Job applicants

CV, , motivation, education and employment history, references, interview notes

4.5 Website en communication

Technical data: IP address, browser type, date/time, visited pages

Email open/click behaviour (only when consent is required for non-essential cookies)

5 Purposes and legal bases (GDPR)

Care and record-keeping

- Purpose: diagnostics, treatment, documentation, teamwork
- Legal basis: performance of treatment agreement (GDPR 6(1)(b)); for special data: necessary for healthcare (GDPR 9(2)(h) + WGB0)

Quality and safety (Wkkgz/Wtza) & legal obligations

- Purpose: records, incident/calamity registration, supervision/audit, mandatory reporting
- Legal basis: legal obligation (GDPR 6(1)(c))

Financial processing

- Purpose: claims, reimbursements, invoices, tax retention
- Legal basis: legal obligation (GDPR 6(1)(c))

Contact and planning

- Purpose: appointments, answering questions, safe communication
- Legal basis: legitimate interest (6(1)(f)) and/or performance of agreement (6(1)(b))

Cooperation with third parties outside the direct care relationship (e.g., schools)

- Purpose: coordinated care
- Legal basis: consent from client/representative (GDPR 6(1)(a); for medical data 9(2)(a)), unless necessary due to law or vital interests

Job applications

- Purpose: recruitment & selection
- Legal basis: legitimate interest (6(1)(f)); with consent for longer data retention

No automated decision-making

We do not make decisions based solely on automated processing (profiling) that produce legal effects for you.

6 With whom we share data

- Practitioners within Child Development involved in care (including supervised interns), bound by confidentiality
- Referrers and partners (e.g., GPs, youth doctors, schools), only when necessary and—when required—with consent
- Insurers/municipalities for declarations and checks
- Supervisory bodies/auditors (e.g., IGJ), dispute bodies, disciplinary boards when legally required

- Processors (e.g., EHR provider, hosting, email, calendar/SMS services, billing, bookkeeping) — under processor agreements
- We do not sell personal data and do not share for marketing.

7 Data transfer outside EEA

We store data preferably within the EEA. If transfer outside the EEA is necessary, we apply appropriate safeguards (e.g., SCCs or Transfer Impact Assessment) and inform you when required

8 Security

We implement appropriate technical and organizational measures, including encryption, access control, logging, secure connections, updates, confidentiality agreements, DPIAs where required, and a data breach procedure (reporting to the Dutch DPA within 72 hours when necessary, and to affected individuals when high risk exists).

9 Retention periods

We do not keep data longer than necessary for the purposes described, unless required by law or professional rules.

Personal data of minors are retained only as long as necessary for responsible care.

Medical and psychological data are retained for 20 years from the last treatment, unless longer retention is necessary for good care or required by law.

Assessment is made by the practitioner according to applicable regulations.

10 Your rights (GDPR)

- Access and copy
- Rectification/addition
- Restriction
- Objection (for legitimate-interest processing)
- Data portability (where applicable)
- Withdrawal of consent (without affecting prior processing)
- Erasure (within legal limits such as WGB0/tax law)

Minors:

- Up to 12 years: rights exercised by parents/legal representatives
- 12–15 years: rights exercised jointly
- From 16 years: the young person acts independently

To exercise your rights: email admin@childdevelopment.nl.

We respond within one month and may request additional verification information.

If you disagree with our data handling, you may submit a complaint to the Dutch Data Protection Authority: www.autoriteitpersoonsgegevens.nl

11 Complaints & disputes

We follow a Wkkgz-compliant complaints procedure. We process personal data needed to handle the complaint, communicate with you, conduct investigation, and refer to a dispute body if needed.

- Complaints officer: J. Knoester
- Submit complaints: admin@childdevelopment.nl

12 Domestic violence and child abuse reporting code

Child Development is legally required to follow the national Reporting Code. If safety concerns arise, we follow the code carefully. This may include sharing data with **Veilig Thuis** or other authorized bodies, only when necessary and legally permitted, with attention to proportionality and the child's best interest.

13 Wtza and supervision

The Wtza includes reporting and governance obligations. For this we may process personal data (e.g., audits, IGJ supervision). Legal basis: legal obligation.

14 Cooperation with education and youth services

We coordinate with school/youth services only when necessary for the help request and:

- with consent for sharing medical/psychological information, **or**
- when a legal obligation or vital interest applies (exceptional).

We share no more than strictly necessary.

15 Website visit

During website visits we process only functional and technical data necessary for safe operation, including:

- IP address (anonymized where possible)
- Browser/device type
- Date/time of visit
- Visited pages

Used to ensure security and improve basic functioning.

We do not use tracking, marketing, or third-party analytics cookies.

If we introduce analytical/marketing cookies in the future, we will inform you and request consent where required.

Data sent via the website or email is used only to respond to your question and is not retained longer than necessary.

16 Processors and third parties

We have processor agreements with all external parties who process personal data on our behalf, and we periodically assess their security. Categories include: EPD provider, hosting/email, scheduling/SMS, accounting, time/billing systems, security monitoring.

17 Changes

We may update this privacy statement. The version date is always displayed at the top. For major changes we will actively notify you (e.g., via email or our client portal).

18 Definitions

Personal data: Any information that directly or indirectly identifies a person (e.g., name, contact details). Special personal data include medical and psychological information.

Processing: Any operation involving personal data (collecting, storing, using, sharing, deleting, etc.).

Controller: The organization determining the purposes and means of data processing — in this case, Child Development.

Processor: A party that processes personal data on behalf of the controller (e.g., EHR provider, IT service provider)