

Your privacy is of paramount importance to us. In this privacy statement we explain how we process your information. We ensure that the personal data that we process are treated confidentially and will only process your personal data in accordance with privacy legislation.

This means that we:

- **Clearly state for which purposes** we process personal data. We do this by way of this privacy statement.
- **Limit the personal data** we collect to those required for legitimate purposes.
- **Ask for your explicit consent** to process your personal data in situations that require your consent.
- **Take adequate security measures** to protect your personal data, while demanding that parties processing personal data on our behalf do the same.
- Respect your rights to **view your personal data or to have the data corrected or removed at your request.**

This privacy statement explains which personal data we collect and for what purpose. Please read it carefully.

Processing of personal data

Participants in our Analytical Competence Tool (ACT®)

If you fill in our ACT® measurement, you will provide us with your personal data. We will retain the data to perform the measurement and use it to draw up a report of our findings. We are the controller of the personal data that are processed in our products. This may be regular or special personal data. Special personal data at least include data on your mental condition. We process the special personal data in, for instance, the products of ACT® Burnout.

We process the following regular data:

- Unique combination of user name and password, provided by HBM.
- First name and surname.
- Gender.
- Address details.
- Telephone number and email address.
- Date of birth.
- Level of education.
- Reporting language.
- Combination of images selected and competencies in the measurement (ACT®).
- Date on which the measurement was sent out, completed and will expire.

In addition to the above regular data, we process the following special data if you or your employer (on your behalf) purchase an ACT® Burnout product:

- Your sensitivity to a burnout.
- The type of burnout typology applicable to you.

Our HBM Professionals

If you have attended one or more programmes at myHBMcenter as a result of which you are accredited to use ACT® as HBM Professional, you are part of our HBM network. In that case, we will process your personal data in two ways. First of all, you have completed the measurement yourself, so we process your personal data as a participant (as described in the previous paragraph). In addition, you use our administration panel, buy products, attend supervisions and possibly follow-up programmes and use (where necessary) our help desk, ACTor-net, website and marketing material. We also keep you up to date on the latest developments, product updates and events by means of our monthly newsletter.

For these purposes, we also process the following personal data:

- Personal relationship number.
- Place of birth.
- Data on the organisation.
- Accreditations attended.
- Supervisions attended.
- HBM certificates.
- Units purchased.
- Quotes issued by HBM.
- Invoice and payment data.
- Conversation notes.

The grounds for processing both regular and special personal data is **your consent**. If you do not agree to processing of your personal data, you can object to it (see also the section "Your rights").

Security

We employ security measures in order to limit the abuse of and unauthorised access to personal data. We ensure that only authorised persons have access to your data, that access to the data is protected and that our security measures are regularly inspected. In addition, we use secure connections for the secure transfer of your data and communication. For more details about security, see our [my HBM Security document](#).

Provision to third parties

If you do the measurement through your employer, we transfer your *regular* personal data to this employer. They will use your data to make the most of your skills within the organisation based on the competencies determined. This is done on the basis of the (employment) contract between you and your employer. The special personal data may, after your consent, be transferred to the Occupational Health and Safety Service (Arbodienst) or company doctor. myHBMcenter or the Occupational Health and Safety Service/company doctor may then inform your employer about (only) the practical implications of your mental health. We do not provide your personal data to other companies or institutions, except if we are legally obliged to do so (for instance if required by the police in case of suspicion of a criminal offence).

Retention periods

The ACT® measurement is unique because it measures your unconscious inner patterns. You can only select the images truly unconsciously once. To guarantee reliable and valid measurement results, participants can only select these images once. However, competencies can be selected more often, at 3-year intervals, as these are about visible behaviour. Behaviour can change - it should change if you set to work on your personal and professional development. For these reasons, we always store your measurement (selected images and competencies) in our database. If you want to set to work on your measurement and development at a later point in time, or need the measurement for a new employer, we always have access to your original measurement. We retain the personal data we process for you as participant for 4 years. After expiry of this retention term, we will send you an email with the option of renewing the retention term by another 4 years. The advantage is that the measurement remains "active" and can be accessed by you and, if necessary, the HBM Professional. If you want to have your personal data deleted after 4 years, we will separate them from your measurement and encrypt the data. myHBMcenter then no longer has any insight into/access to these data. Only you can link the data to the measurement again as soon as you need the measurement. If you want to have your personal data permanently erased, you can tell us as well. The drawback is that we no longer have access to your measurement should you need it at a later point in time. In that case it will no longer be possible to do a new measurement, because you will no longer be able to select the images unconsciously. We retain personal data on our HBM Professionals for as long as they are accredited.

If you want us to delete your data before the end of the retention term, see the section "Your rights". We will delete personal data subject to a statutory retention term as soon as this retention term has ended. We are obliged to comply with the statutory retention periods.

Modifications to this privacy statement

If our working method changes, we will also need to modify our privacy statement. So take note of the date at the bottom and regularly check whether there are new versions. We will also do our best to announce changes separately.

Your rights

If you have any questions or would like to know which personal data we have on you, you can always contact us. See the contact details at the bottom of this page.

You have the following rights, for which you can submit a request to us:

- Access to the personal data we process on you.
- Rectification of mistakes;
- Erasure of obsolete personal data;
- Objection to a certain use.
- Data portability: Receiving an export of your personal data in a structured, commonly used and machine-readable format.

When you submit a request, always state clearly who you are, so that we can be certain that we do not change or delete the data on the wrong person. We may ask for additional data to verify your identity. We will respond to your request within four weeks.

Filing a complaint

If you have a complaint about processing of personal data, please let us know. We have appointed a Privacy Officer. This person is the internal supervisory officer and point of contact for privacy issues and the processing of personal data in our organisation. The contact details for our Privacy Officer are given below.

On the basis of the privacy law, you also have the right to submit a complaint to the national supervisory authority, the [Dutch Data Protection Authority](#).

Contact details

myHBMcenter B.V.

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Privacy Officer

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