



# Privacy Statement

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# Inleiding



We rate your privacy extremely highly. Accordingly, we adhere to all relevant legislation and regulation, such as the General Data Protection Act (hereafter referred to as the GDPR).

Your personal data is in safe, professional hands with us. This Privacy Statement outlines everything Roompot does with the information we learn about you.

The information in this Privacy Statement relates to (the parents of) our swimming lesson attendees.

This Privacy Statement applies to Roompot. This includes the following entities: Roompot Services B.V., Roompot Recreatie Beheer B.V. and the park where the swimming pool is located.

If you have any further questions or want to know exactly what data we hold about you, please contact Roompot. Our contact details are listed at the bottom of this Privacy Statement.

# Processen

Below you will find the processes that occur within our organisation. For each one we have listed the reasons for processing your personal data. The table below that shows the personal data we process. Occasionally, we forward your personal data on or third parties help us process your personal data. These third parties are also listed in the table.

# Generic communication

Purpose: Communication by Roompot with third parties and internal workforce communication

In this Privacy Statement we endeavour to specify as accurately as possible why, when and how Roompot communicates. However, certain (exceptional) cases may arise that are hard to readily categorise under one of the outlined processes. In such an instance, we apply the following personal data processing principles.

We process personal data based on our legitimate interest in conducting standard business operations.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
<b>Communication (Correspondence)</b>	Legitimate interest	For as long as is necessary for the communication in question	Microsoft

<b>Contact (Email address, Telephone number)</b>	Legitimate interest	Microsoft
		For as long as is necessary for the communication in question
<b>Name (Full name)</b>	Legitimate interest	Microsoft
		For as long as is necessary for the communication in question

## Swimming lesson registration

Purpose: Registering a child for swimming lessons.

If you sign your child up for swimming lessons, you may be temporarily placed on a waiting list. The following data is processed for the registration process.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
<b>Financial (Payment link)</b>	Contract fulfilment	One-off	Plan Plan Internet
<b>Contact (Email address, Telephone number)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet
<b>Gender (Gender)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet
<b>Financial (IBAN)</b>	Contract fulfilment	7 years	
<b>Age (Age)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet

<b>Name (Full name)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet
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## Creating swimming score app account

Purpose: To create an account in the swimming score app for lessons.

Our swimming schools use the swimming score app developed by Plan Plan Internet B.V. Via this app, you can notify child absence for progress-monitored swimming lessons. We will create an account for you when your child starts their swimming lessons.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
<b>Contact (Email address)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet
<b>Login (Username, Password)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet
<b>Name (Full name)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet

## Swimming lesson attendance register

Purpose: Child absence and tracking swimming lesson attendance.

If your child doesn't or cannot attend a swimming lesson, we kindly ask you to notify us of the cancellation via the swimming score app. This helps the swimming teacher know which children are present. Attendance registers are also kept during the actual swimming lessons.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
<b>Swimming lessons (Cancellations, Scheduled swimming lessons)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet
<b>Name (Full name)</b>	Contract fulfilment	For the duration of the swimming lessons	Plan Plan Internet

## Swimming lesson progress

Purpose: Tracking the child's progress in the swimming score app.

We keep track of your child's progress for the duration of their swimming lessons, in the swimming score app. This way, as a parent or carer, you can see how things are going and what requires a little more practice.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
<b>Gender (Gender)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet
<b>Age (Age)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet
<b>Name (Full name)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet

<b>Swimming lessons (Progress)</b>	Legitimate interest	For the duration of the swimming lessons	Plan Plan Internet
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## Complaints handling

Purpose: Handling complaints submitted to Roompot.

We do our utmost to ensure your stay at Roompot is the best it can be. Unfortunately, we sometimes fall short of the mark. You can always submit a complaint if you feel the need to do so. We will then put our heads together to try and find an appropriate solution.

Still feel the issue is unresolved? Please feel free to take further steps. For instance, you could approach the Disputes Committee. In such an instance we will usually provide your details to our lawyer, to help us further.

<b>What kind of data do we process?</b>	<b>Upon what grounds do we process this data?</b>	<b>How long do we retain this data for?</b>	<b>Stakeholders</b>
<b>Complaints (Compensation)</b>	Contract fulfilment	7 years	Microsoft, Salesforce
<b>Communication (Correspondence)</b>	Legitimate interest	7 years	Microsoft, Salesforce
<b>Complaints (Complaint)</b>	Legitimate interest	7 years	Salesforce, Microsoft
<b>Address (Full address)</b>	Legitimate interest	7 years	Salesforce
<b>Name (Full name)</b>	Legitimate interest	7 years	Microsoft, Salesforce
<b>Financial (IBAN)</b>	Contract fulfilment	7 years	Microsoft, Salesforce

# CCTV



Purpose: CCTV at Head Office and the parks.

To ensure the safety of guests, personal property and our employees, CCTV is in operation in various locations. In highly exceptional cases temporarily concealed CCTV is also deployed. We only do so if no other option is available to us.

The exact retention period of security footage varies per location, yet is always less than 14 days.

Roompot is acutely aware that the filming of guests and employees comprises a significant infringement of privacy. That is why we handle the footage with extreme care and only film where necessary.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Photo & video (Security footage)	Legitimate interest	7 days	SBeffect, HS Security

## Management info

Purpose: Gaining insight into various Roompot activities for the improvement of the organisation and its service provision.

When formulating management information we always strive to only process required information. At no time will generated reports contain personal data.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Miscellaneous	Legitimate interest	7 years	Microsoft

## Recipients

Above we listed the third parties that may potentially process your personal data too. We call these third parties 'recipients'. The table below lists all of these recipients. We have also stated what they do, plus their contact details. This way, you always know where your personal data is processed.

Sometimes a recipient processes your data outside of the EU. Rest assured, caveats are attached. The GDPR mandates us to take specific pre-determined steps in such an instance. Which, of course, we do. Below we have outlined the steps we take.

Recipient	Explanation	Recipient details
Microsoft	Microsoft 365	One Microsoft Place, South County Business Park, Leopardstown P521



		D18, Dublin Ireland
<b>Salesforce</b>	CRM system	Mission Street 415 (Salesforce Tower 3rd Floor) CA94105, San Francisco United States  Outside the E.E.A. Warranties: Standard Contractual Clauses (United States of America)
<b>HS Security</b>	Security	Mariapolderseweg 1 4493 PH, Kamperland The Netherlands
<b>SBeffect</b>	ICT support	Amundsenweg 51-53 4462 GP, Goes The Netherlands
<b>Plan Plan Internet</b>	Swimming score app	Winkler Prinsstraat 13 9403 AZ, Assen The Netherlands

## Amendments to this Privacy Statement

Roompot is a dynamic organisation. This may impact your personal data. For instance, we may start processing more of your personal data, or for different purposes. However, we will always provide advance notice. We do so by making amendments to this Privacy Statement. Would you like to know when this Privacy Statement comes into effect? If you go right to the top of this statement, you'll see the start date listed.

## Your rights

If we process your personal data, you in turn are entitled to certain rights. Would you like to exercise these rights? If so, please get in touch with us, stating the right(s) you wish to exercise. Our contact details are listed at the bottom of this Privacy Statement.

Please clearly state your name. This will ensure we don't mistakenly adjust or delete data for another person. It may be the case that we aren't able or authorised to carry out your request. This depends on a number of issues. Which we will of course always notify you of. Would you like more information about your rights? If so, please visit the Dutch Data Protection Authority's website.

As a rule, we will carry out your request within 1 month. Occasionally this may unfortunately take longer. In this instance we will notify you and explain why we need more time.



You are entitled to the following rights:

### **Right of access**

Would you like to know what kind of personal data Roompot processes about you? If so, you can submit a request to inspect this data. It's more than likely that we process different categories of your personal data. Or for several purposes. You may only wish to inspect some of the data that has been processed. Please therefore clearly state exactly what it is you wish to inspect.

### **Right to rectification**

Has it transpired that your personal data held by Roompot is inaccurate, incomplete or irrelevant? If so, you can submit a request to have your data changed or supplemented. You can request rectification if your personal data is inaccurate, incomplete, irrelevant to the purpose for which it was collated or if we use your personal data in such a way that you believe contravenes legislation.

### **Right to erasure**

You can ask us to erase your personal data. However, we would like to stress that we most likely won't be able or authorised to erase all your personal data. We will however always keep you notified in this instance.

### **Right to data portability**

If Roompot processes your personal data you can exercise your right to data portability (transmission of personal data), as you have provided your consent to do so. Or to be able to fulfil a contract with you. Please note: this only applies to data that we process digitally. So, not to hard copies.

### **Right to restrict processing**

In certain circumstances an organisation may no longer use your personal data. Nor can it (yet) erase the data either. In such an instance the organisation must temporarily cease using your personal data. This is known as the right to restrict processing. You can ask us to limit the processing of your personal data.

### **Right to object**

There are two situations in which you can ask Roompot to cease using your personal data. This is known as the right to object. Firstly, if we use your personal data for direct marketing purposes. Secondly, you can object against the use of your personal data based on your specific individual situation.

### **Right to revoke consent**

Does Roompot process your personal data based on your consent? If so, you can revoke your consent at any given time. We will no longer process your personal data from that moment on. Unless (other) reasons for processing your personal data prevail.

# Technical and organisational provisions



We deem personal data security to be paramount. We take the following steps to safeguard your privacy:

## Technical provisions:

- Access to your personal data is protected by a username (where feasible) and password, which is subject to a password policy.
- Access to personal data is protected by a username and a login token (where feasible).
- Upon receipt, personal data is saved in separate, encrypted folders.

## Organisational provisions:

- Access to files is restricted via roles & rights.
- We take physical steps, such as access protection locks for the systems storing personal data.
- Periodic review of the effectiveness of our provisions.

## Submitting a complaint

If you wish to submit a complaint about the use of your personal data please email: [privacy@roompot.nl](mailto:privacy@roompot.nl). We address any complaint internally and communicate this further with you.

In addition, you have the right to file a complaint with the regulator at any time. In The Netherlands that would be the Dutch Data Protection Authority.

## Contact details

Should you have any questions or wish to know what personal data we hold about you, please get in touch with us. The contact details are listed below.

Roompot  
Schuiverweg 2  
4462 HK, Goes  
The Netherlands  
E-mail address: [privacy@roompot.nl](mailto:privacy@roompot.nl)  
Telephone: +31 (0)88 0444 999