

PRIVACY STATEMENT INTERNITY

PREFACE

The General Data Protection Regulation (AVG: Algemene Verordening Gegevensbescherming) applies from 25 May 2018. This European privacy legislation makes more demands on organizations to guarantee the privacy of consumers. Adequate security has therefore become even more important. The General Data Protection Regulation (AVG: Algemene Verordening Gegevensbescherming) replaces the former Law Protection Personal Data (WBP: Wet Bescherming Persoonsgegevens).

The AVG has some mandatory measures mentioned, to which Internity and everyone connected in any way to Internity must comply, due to sensitive information from clients administrated in the records of Internity.

The security has a legal and a technical side. From a legal point of view, it comprises what agreements have been made and how these have been recorded. The technical side is about how the technology is arranged to optimize client data protection.

The mandatory measures that the AVG specifically mentions are:

- The maintenance of a register of processing activities.
- The performance of a security check of the digital client file system.
- The keeping of a register of data breaches that have occurred.
- Proof that a client has effectively allowed for recording data in the client file.

WHAT THE PROCESSING REGISTER MUST CONTAIN

The AVG prescribes which information must be included in the register of processing activities. If the Dutch Data Protection Authority (AP: Autoriteit Persoonsgegevens) requests this, Internity must be able to display the register immediately.

The following is included in this register of processing activities of Internity:

- A description of the categories of personal data (= client data) processed in the client file and/or in a digital program.
- A description of the purposes for which the personal data are processed.



- A description of the rights every person involved has and how they can exercise these rights (such as the right to view, change, delete and receive all registered data).
- Which organizational and technical measures Internity has taken to secure the personal data.
- Duration of storage of personal data.
- How Internity handles a data-breach.

PRIVACY STATEMENT INTERNITY

Internity respects your privacy, but we need your personal information for our services. In this statement you can read which data we use and how we store, protect and process this information. This Privacy Statement applies to our website www.internity.me and the services we offer. We treat your personal data in accordance with the General Data Protection Regulation (AVG). To offer our services, we process personal data. The term “personal data” means information that can be used to identify you as a person.

Internity respects the privacy of its customers, clients, the visitors to its website www.internity.me and those who have applied for guidance, programs and workshops with Internity and Internity-BROES.

YOUR PERMISSION

We can save your data on different occasions, such as when you visit our website www.internity.me, create an account on our website or our client system "MijnDiAd", when you make use of our services or when you contact us. We may process your data because we request your permission through this privacy policy. Moreover, we require your details to set up a client file for your therapeutic guidance and good business practice (billing, providing income information to the tax authorities, drafting year figures, information for own business operations). If you choose not to share, we're unable to deliver our services to you. We will never share your data with third parties without your permission, unless we are legally obliged to do so.

MIJNDIAD LEGAL

MijnDiAd is an online system that we use to record your client data and to conduct a thorough practice administration. Internity only conducts an online administration; your data is not recorded in a paper file. In addition to names, addresses and contact details, so-called special personal details are also recorded. This concerns, for example, medical details or the details of your health insurance policy. Because it can be sensitive data, adequate security is extremely important.

All data we at Internity or you as a client enter in MijnDiAd remains with Internity. The organisation MijnDiAd only processes data and organises its availability in the client system. MijnDiAd only uses data to improve the functionality of MijnDiAd and to ensure availability of all information. MijnDiAd will not sell any data and will not contact clients.

For the law MijnDiAd is a processor and the customer of MijnDiAd (=Internity) is responsible. MijnDiAd only processes data on behalf of its customers. The agreements that MijnDiAd makes with Internity as a customer in this regard are laid down in a processing



agreement. This agreement sets out the obligations with regard to the processing of personal data between Internity and MijnDiAd. In addition, a confidentiality statement is included herein.

MijnDiAd contracts third parties and grants them access to personal data. MijnDiAd has processing agreements including confidentiality obligations with these parties (hosting party and system administrator). These processors agreements can be obtained with MijnDiAd. Through these agreements we can demonstrate that we have clear agreements and that confidentiality is guaranteed.

MIJNDIAD TECHNICAL

In addition to the legal side, MijnDiAd also ensures adequate technical security for MijnDiAd. Your data is stored on a server (storage specially designed for MijnDiAd) in the Netherlands. This is often referred to as 'working in the cloud'. This means the server is connected to the internet to ensure that we at Internity always have online connection with your client data sources.

MijnDiAd organises security of data in the following ways:

1. All data is only sent over an HTTPS connection (SHA-256 with RSA encryption).
2. The sensitive data (such as the name and address, personal data, mail addresses and reports) are stored encrypted in the database.
3. Customers of MijnDiAd (= Internity) are required to use a strong password.
4. It is mandatory to use two-step verification. As a result, an additional code is needed in addition to the password (which is generated on the phone of the user of MijnDiAd) to be able to log in to MijnDiAd.
5. The servers used to store the data are located in a secure data center of Previder in the Netherlands.
6. This data center has various certifications to achieve stable and secure access for MijnDiAd:
 - ISO 27001: 2013 certified
 - ISO 14001: 2015 certified
 - ISO 9001: 2015 certified
 - NEN 7510 certified
 - Every client of MijnDiAd(=Internity) has its own database.
 - The databases are backed up every 24 hours.
 - The current data is always stored at 2 physically separated locations. In the event of a disaster, it is possible to switch to the other location.

WHAT INFORMATION DO WE COLLECT AND WHAT DO WE DO WITH IT?

For our services we require the following information:

- Name
- Address
- Town of residence
- Telephonenumber(s)
- Email address
- Date of birth
- Gender
- Health insurer
- Health insurer policy number
- General practitioner
- IP address
- IBAN payment details

PRIVACY ON THE HEALTHCARE INVOICE

The invoice you receive from Internity, shows the following information, in order for you to reimburse the invoice with your insurance company. The data processed on your healthcare invoice is also processed by the accountant of Internity, with whom a processing agreement has been concluded to guarantee your privacy.

- Name
- Address
- Town of residence
- Date of birth
- Health insurer
- Health insurer policy number
- Consultation date
- Description of the nature of the consultation, such as, for example, "Consult psychosocial therapy" or "Consult hypnotherapy", together with the performance code health insurance.
- Fee of the consultation

PRIVACY ON THE CLIENT FILE

For proper guidance, it is necessary that the therapist who guides you, sets up a client file. This is also a legal obligation, imposed by the Law on Medical Treatment Agreement (WGBO: Wet Geneeskundige Behandovereenkomst), which Internity and all therapists connected to Internity will confirm. Your file contains notes about your health status and information about possible examinations, diagnoses and treatments. Data in the client file, as required by the WGBO, are retained for 20 years from the moment they are recorded in the client file.

Your therapist only has access to the data in your file. Every therapist working at Internity has a legal confidentiality obligation (professional secrecy and professional code), is a certified therapist and is affiliated with a professional association and national dispute committee.

Health data are classified as special data in the AVG. These may only be processed if this is necessary for preventive medical purposes, medical diagnoses, providing health care or social services or



treatments, by law, or by agreement with your accompanying Internity therapist. Your health information will not be provided to IT management, financial administration, accountant or the tax authorities.

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Third parties receive your data from us. We agree with these parties in a processing agreement that they will handle your data with care and they will only receive the data necessary to provide their services. These parties only use your data in accordance with the instructions we give them and not for their own purposes. We may, for example, pass on part of your data to the client file system (MijnDiAd), the accounting system, the accountant (4D-Advies), the Tax Authorities, hosting party (Kjilop ICT), the system administrator, the newsletter system, the payment provider, and the cloud storage provider (Kjilop ICT). They will perform the work for which Internity is contracting them. This only concerns the data of the "Privacy on the healthcare invoice". Data concerning "Privacy on the client file" will never be provided to third parties without your express written permission.

The data from your client file can also be used for the following purposes:

- To inform other healthcare providers, for example if your guidance has been completed or when referring to another practitioner. This only happens at your request and with your explicit written permission.
- For an acting colleague during the unexpected absence of your accompanying therapist, should this be necessary. Both running and closed files will in that case be taken over by a colleague who is bound to all the safeguards for proper practice management and proper storage of files. For the transfer of file data, only data covered by the "Privacy on the healthcare invoice" and the client planning of Internity is provided. Only with your explicit written permission will the acting colleague gain access to your client file with health data.
- For anonymised use during peer review and supervision.
- If Internity wishes to use your data for another reason, Internity will first inform you and explicitly request your written permission.

REPORTING CODE DOMESTIC VIOLENCE & (CHILD) ABUSE AND MULTIDISCIPLINARY GUIDELINE FOR DIAGNOSIS AND TREATMENT OF SUICIDAL BEHAVIOR (MDR)

INTERNITY confirms itself to the Reporting Code for Domestic Violence and (Child) Abuse. This means that if there is a suspicion of domestic violence and/or (child) abuse we will discuss this with the Client. INTERNITY will initially assess whether the Therapist involved is able to offer or organize effective/appropriate assistance. A condition is that the people involved cooperate in the help offered and that the help leads to sustainable safety. If it is not possible to provide assistance on the basis of these conditions, INTERNITY will report to Veilig Thuis (www.veiligthuis.nl).

INTERNITY also confirms to the Multidisciplinary Guideline for Diagnosis and Treatment of Suicidal Behavior (MDR). This means that, in the context of good counseling, a professional confronted with a Client with acute and concrete suicidal plans must make a risk-analysis to avert serious damage. In addition, it may be necessary to share minimum necessary information with family members or



other professionals. The Client will be informed about these measures, immediately or as soon as possible.

WEBSITE AND COOKIES

When you visit the website www.internity.me, your personal data is processed for the improvement of the website of Internity and social media sharing.

General visitor data is recorded on the website. In this context in particular the IP address of your computer, the time of extraction of information, data the browser is sending, the operating system you use, the serviceprovider of internetaccess you use, the type of device you use, are recorded and used to obtain statistical information about the quality and/or effectiveness of the website.

The Internity website uses 3 types of cookies: necessary cookies, analytical cookies and social media plugins. A cookie is a small text file transmitted to the hard drive of your computer or mobile device by a website that you visit. Information about your visit is stored in this text file. This information can be recognized by this website at a later visit.

NECESSARY COOKIES

Necessary cookies are cookies required for the functioning of the website. The purpose of cookies is to preserve your preference regarding cookies or the language in which the website is displayed.

ANALYTICAL COOKIES

Analytical cookies are cookies designed to keep track of how customers use the website. We use the Google Analytics tool for keeping track of website visits. The information obtained is transferred to and stored by Google on servers of Google in the United States by means of analytical cookies, including the address of your computer (IP address). The IP address can never be traced to a physical address. Google is affiliated with the EU-US Privacy Shield Framework. We have taken measures within Google Analytics to limit the traceability of visitors to the website and we do not allow Google to use the information obtained for other Google services. Google can provide the information obtained to third parties if Google is legally obliged to do so, or insofar as these third parties process the information on behalf of Google (Google processors). Read the privacy policy of Google for more information, as well as the specific privacy policy of Google Analytics.

SOCIAL MEDIA PLUGINS

You can share the messages on our website via the buttons on them from the social networks LinkedIn and Facebook. The sending of these messages is achieved by a code that is supplied by LinkedIn and Facebook itself. These codes use cookies. Read the privacy statements of LinkedIn and Facebook (which change regularly) to learn how these organisations process your personal data (including any transfer of your personal data outside the EU/EEA).

OWN RESPONSIBILITY

You have control over cookies and you can refuse their placement by adjusting the cookie settings in your browser. Most browsers indicate how you can refuse the placement of cookies, how you are



informed about the placement of a cookie, and how you can delete cookies. However, by refusing the placement of cookies or deleting placed cookies, you may not be able to use our website (in full).

You can send messages and questions to us via the contact form on the Internity website. The processing of this information is subject to the regulation of the AVG, but has a lower security status than information that you send via the online client system MijnDiAd (see above). By using this contactform you agree to the processing of your data by the website of Internity.

PROGRAM OFFERS AND NEWSLETTERS

Internity provides newsletters and sends regular emails to a group of (potential) interested parties in which we announce (new) program offers. This way you are informed of offers, (discount) promotions and other news. When signing up for individual counseling and/or one of our programs or workshops, we collect the name of the organization (if applicable), your name, address and postcode, telephone number, email address and any specific questions aimed at the individual guidance and/or the program you selected.

To be sure of your permission, we use the opt-in system for newsletters. With every communication via this route a cancellation option is included. We will only use your data for the above purposes, or for a purpose closely related to this. This way your data will never be used by us in an unexpected way.

MARKET RESEARCH AND/OR CLIENT SATISFACTION SURVEY

We may ask you to participate in a market survey or a client satisfaction survey. To send a questionnaire, we will then use your data for the research, but only after you have given your explicit written permission for this. We use this statistical information anonymously for Internity. You can close the questionnaire at any time. We do not give your answers to third parties and results will only be published anonymously. If you tick "no", this will in no way affect your guidance.

We may ask you if you mind that we pass your email address for a survey on customer satisfaction to the professional association your therapist of Internity is affiliated with. You are hereby informed that at the finalisation of your program you receive an email from the professional association VIT (Vereniging Integraal Therapeuten) asking whether you wish to complete an online questionnaire. This is completely anonymous and your email address will only be used for this client satisfaction survey. With your input, the quality of service from Internity can constantly improve. If you tick "no", this will in no way affect your guidance.

SECURITY

Internity will do everything possible to protect personal information from loss, destruction, use, modification or disclosure of your personal data by unauthorized persons. As a result, those who have nothing to do with your data cannot access it. Internity organises this through the following measures:



- All persons with a personal account in the Internity client system must keep their account details and password strictly confidential.
- Securing network connections with Secure Socket Layer (SSL), or similar technology.
- Access to the data is limited to the people who need the data.
- Access to the data is secured with two-step verification.
- ISO27001 and NEN7510 certified hosting party.
- Processor agreements including confidentiality with all persons and companies that have access to the data.
- Daily encrypted backup to a physically different location.
- Automatic update of the most recent version of relevant software, to ensure software is optimally protected.
- Internity does not conduct paper administration.

SECURITY INCIDENTS

Internity will notify you as soon as possible in case of theft, loss or abuse of personal data or any other form of data-breach. This includes reporting, where possible, at least the following: the nature of the infringement, the category and amount of data, the likely impact of the data-breach, the measures Internity has taken and the contact point where you as client can obtain information.

Where necessary, Internity will fully cooperate in adequately informing the authorities and persons involved about such security incidents or data-breaches. Internity will also fully cooperate with risk assessment, analysis of the cause, identification of required corrective measures and implementation thereof.

PRIVACY RIGHTS

We are aware that you have a number of privacy rights (access, rectification, removal, restriction, objection and data transferability) with regard to the processing of your personal data. To exercise your privacy rights you can send a request by email to info@internity.me stating 'Exercising privacy rights' or by regular mail to Internity stating 'Exercising privacy rights', to the practice address stated on the website of Internity. For verification purposes we may ask you for proof of your identity.

The information we collect from you is personal. You therefore have the following rights:

- You can ask us to view your data.
- You may ask us to correct, limit or delete your data. In the event of fraud, non-payment or other unlawful acts, we may store some of your details in a register or blacklist.
- You can ask us for a copy of your data.
- You can object to the processing of your data.
- You can file a complaint with the Dutch Data Protection Authority if you think that we are processing your data unlawfully. More information can be found at www.autoriteitpersoonsgegevens.nl.
- You may always withdraw your permission to process your data. From the moment you withdraw the permission, we may no longer process any data from you.

**TRANSFER**

We will only process data within the European Union. Outside the European Union, we only process data, if that country provides an adequate level of protection for your data or if we are legally required to do so. Without your permission, we will never give your data to other countries or to parties other than those mentioned above.

LINKS

Links to other websites can be found on the Internity website. Internity is not responsible for the content or privacy protection of these websites. We therefore advise you to always read the privacy policy of the relevant website.

CONTACT INFORMATION INTERNITY

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SCAG license number Loes Kaijen: 16188
AGB care providers code Loes Kaijen: 90104399
AGB practice code: 90063704