

PRIVACY POLICY

This document states the privacy policy of "ShiftsHappen", part of Academy of Life, established in Berkel-Enschot, the Netherlands. ShiftsHappen is convinced that the protection of personal data is essential for its activities. We therefore wish to provide you with clear and transparent information on how we collect and process personal data, as well as on the manner of protection and the purposes for which this personal data is used.

We may use personal information to establish contact with you and administer services in relationship to our core business, i.e. providing leadership, executive and team coaching programs, and providing training programs and process facilitation, as well as other businesses connected to the services of ShiftsHappen. The data can also be used to administer and improve our website (including analyzing the data related to the use of our website), and as otherwise set forth in this Privacy Policy Statement.

1. Use of Personal data

- 1.1 ShiftsHappen (potentially) uses personal data, if you:
 - visit our website;
 - put in a request for more detailed information about the offerings of ShiftsHappen;
 - contact us via our contact form on our website;
 - write a recommendation for ShiftsHappen;
 - are on a photo or video and we put those images on our website.
- 1.2 ShiftsHappen collects the following personal data:
 - name, address, email address, company name, telephone number, VAT number, payment reference and/ or cost centre mentioned on the invoice;
 - in the case of enlisting for an event, program, training, and/or coaching sessions also the event, program, training and/or coaching sessions you have enlisted for and if necessary, also the further arrangement made between you and ShiftsHappen;
 - your bank account number
 - your IP address, location, demographic data, the type of browser and the pages you visit on our website (via cookies);
- 1.3 ShiftsHappen may use the information we collect from you in the following ways:
- (a) to contact you concerning relevant information;
- (b) to design a tailor-made program for you
- (c) to execute authorizations or carry out bank write-offs or payments;
- (d) to carry out the financial administration.
- 1.4 General visitor data is kept on the website. In this context, in particular the IP address of your computer, the possible user name on that computer, the time of retrieval and data that the browser of a visitor sends, can be registered and used for statistical analysis of visit and click behaviour on the website. We try to anonymize this data as much as possible. This information is not provided to third parties.
- 1.5 All information provided by you, whether in electronic form, oral or written, will be treated confidentially by ShiftsHappen.



- 1.6 You can have the personal information we have collected from you, changed or removed via a request per email.
- 1.7 We agree to the following rules for commercial emails and messages:
- (a) we do not use false or misleading subjects or email addresses;
- (b) we monitor third-party email marketing services for compliance, if one is used;
- (c) we honour unsubscribe requests quickly (for instance for newsletters), using a link at the bottom of those kind of emails.
- 1.8 If at any time you would like to unsubscribe from receiving future emails, you can email us at info@shiftshappen.nl and we will promptly remove you from ALL correspondence.
- 1.9 If you provide us with data related to other persons for example for registration of an event or program you are deemed to have obtained permission from them.

2. INFORMATION, AND COMPLAINTS

- 2.1 You may contact Mr. Sander van Eekelen or Mrs. Jo Boniszewski, founders of ShiftsHappen via info@shiftshappen.nl for:
 - more information regarding the way ShiftsHappen uses and processes personal data;
 - questions regarding this privacy statement;
 - access to the personal data with regard to you, stored by ShiftsHappen;
 - making complaints on the use of your personal data by ShiftsHappen.

3. PROTECTION OF YOUR PERSONAL DATA AND COOKIES

- 3.1 ShiftsHappen will collect and use your personal data only for the objectives stated in this privacy statement and won't store them any longer than necessary.
- 3.2 ShiftsHappen will take appropriate technical and organizational measures to secure your personal data. This data may only be accessed by a limited number of persons who have been given specific rights to consult the systems and use the personal data. They are obliged to keep the personal data confidential.
- 3.3 ShiftsHappen makes use of cookies when offering services. A cookie is a small text file that, when you visit the website, is placed on the hard drive of your computer, tablet or phone. A cookie contains data so that you can be recognized as a visitor, each time you visit the website. It is then possible to set up the website specifically for you and/or to facilitate the login. You can always disable cookies in your browser without having any consequences for the use of the website. However, the result may be that certain parts are less or no longer accessible to you.
- 3.4 You can decide whether to accept or reject cookies. Most Web browsers automatically accept cookies, but you can usually customize your browser's settings to reject cookies. You should reset this for each browser and for each computer.
- 3.5 Visitors are provided with the option to navigate to a variety of external websites. When the visitor selects the option to view the content from these websites, they are taken away from the website of ShiftsHappen and to the other site, where a variety of cookies may be used throughout the visit. ShiftsHappen is not responsible for any cookies used once the visitor has left our websites

4. DATA BREACH

4.1 In order to be in line with Applicable Legislation and Regulations concerning the Processing of Personal Data and the Fair Information Practices we will notify the appropriate organizations, should a data breach occur with a risk of serious adverse effects. You will be notified by email within 7 business days when there is (suspicion of) a data breach.



4.2 A data breach is a security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used by an individual unauthorized to do so.

5. THIRD-PARTY DISCLOSURE

- 5.1 Except as set out in this privacy statement, and in the other paragraphs of this article, ShiftsHappen will not disclose the data information we collect to third parties, unless you have given your explicit consent or if ShiftsHappen is obliged to do so under the law or a Court ruling.
- 5.2 The third parties as mentioned in this article may use the personal data only for the purpose for which they are intended
- 5.3 We do not include or offer third-party products or services on our website.

6. CHANGE PRIVACY STATEMENT, REFERENCE TO OTHER WEBSITES AND VERSION CONTROL

- 6.1 This privacy policy statement may be amended in the future. We therefore recommend that you continue to consult this privacy policy statement on a regular basis.
- 6.2 This privacy statement is effective from May 25th 2018.