



## **Manja Op den Camp**

Manja Op den Camp is registered in Wijchen, The Netherlands as a sole proprietorship with the Chamber of Commerce under number 68134916. The practice is run by me, Manja Op den Camp.

If you have any questions about the protection of your personal data, please contact me via [manja@manjaopdencamp.com](mailto:manja@manjaopdencamp.com).

### **General**

I would like to inform you about how your (personal) data is processed and/or used by me. In this way, I comply with my obligations under the General Data Protection Regulation (GDPR).

This statement applies solely to my services, the services I provide under Manja Op den Camp. Please be aware that I am not responsible for any other service providers mentioned on the website [www.manjaopdencamp.com](http://www.manjaopdencamp.com) (hereafter: my website).

The Dutch Data Protection Authority (AP) is the national authority responsible for the protection of your personal data. For more information, I refer you to [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

### **Personal data**

Personal data is information about a person that can be used to identify or locate that person. It may directly relate to that person or, when combined with other information, lead to the identification of that person. It is important to note that data concerning deceased individuals and businesses (*except for sole proprietorships, general partnerships, or partnerships*) are not considered personal data.

### **Use of personal data**

As my (potential future) client, I collect a number of your personal data. It is important for you to be aware of what is done with this personal data, what rights you have, and how your preferences regarding your personal data can be indicated.

The personal data I receive is treated confidentially to ensure it does not fall into the wrong hands. Sometimes, your personal data may be shared with others who assist me in my business operations, such as my accounting system.

### **Personal data I may collect**

Below is an overview of the personal data I may process from you:

- First and last name;
- Address and/or P.O. Box details;
- Email address & email messages;
- Payment details;
- Phone number;
- Complaints;
- Social media account names & interactions;
- Health data;

The above data has been provided by you or can be derived from public records or social media. Please note that your IP address and location may also be considered personal data in some cases, unless you have disabled that option.

**Why is the processing of personal data necessary**

Processing personal data is not allowed without a valid reason. I must have defined purposes for processing personal data. The purposes for processing the personal data I collect from you must then be justified.

The GDPR establishes six legal bases for this purpose:

- 1. Public interest;
- 2. Legitimate interest;
- 3. Vital interests;
- 4. Based on a contract;
- 5. Based on a legal obligation;
- 6. Based on consent.

Purpose	Legal Basis
For handling your payment	Because this is necessary for the performance of our contract.
To contact you (via phone, in writing, by email), if this is necessary for providing my services	Because this is necessary for the performance of our contract.
To process your (information) request	Because I have a legitimate interest and because it is necessary for the performance of the contract.
To answer your question (online)	Because this is necessary for the performance of an agreement.
To refine the offering	Because I have a legitimate interest.
In case of a legal obligation, such as filing taxes	To comply with a legal obligation.
Because I would like to show a review	Because you have given your consent.
Because I would like to send you a newsletter	Because you have given your consent.

**Special and/or sensitive personal data**

I do not always process special or sensitive personal data from clients or individuals.

In some cases, I process health data because it is necessary for the performance of the contract. This is always done with your consent, and upon your request, I will delete the data immediately.

I do not intend to collect data on individuals under the age of 18 unless they have permission from a parent or guardian. However, I cannot verify if a visitor is over 18. If you believe I have collected personal data about a minor without consent, please contact me, and I will delete the information.

## How long your data is retained

I do not retain your personal data longer than strictly necessary to achieve the purposes for which the data was collected. I follow the retention periods listed below:

Personal Data	Retention Period	Reason
First and last name	7 years (Tax legislation)	To comply with my legal obligation
Address and/or P.O. Box details	7 years (Tax legislation)	To comply with my legal obligation
Phone number	7 years (Tax legislation)	To be able to contact you
Payment details	7 years (Tax legislation)	To comply with my legal obligation
Email address	7 years (Tax legislation) or until you unsubscribe from my mailing list, if you weren't my client	To inform you or be able to contact you
(Email) messages	7 years (Tax legislation)	To retrieve information from you
Social media reaction	Indefinitely	When you respond to a post/article, the reaction remains as long as the article is online. This is indefinite unless you decide your response should be removed. When the response is removed, all personal data will be deleted. No action is taken with received reactions. Reactions are seen as enthusiastic involvement with a post/article.
Social media account names	Indefinitely, unless you remove this data yourself	To respond to your reaction on social media accounts
Other personal data you actively provide	As long as the agreement is in place and up to 1 year after our agreement has ended	Necessary for the execution of the agreement

## Sharing data with third parties

Your data is not sold to third parties, and your information is only shared when necessary for the execution of the agreement with you, because you have given your consent, or to comply with a legal obligation.

For companies that process your data on my behalf (processors), I enter into a data processing agreement to ensure the same level of security and confidentiality for your data. I remain responsible for these processing activities.

With third parties who are independently responsible for processing (so-called data controllers), I do not need to enter into an agreement.

I share personal data with the following third parties:

<b>Third Party</b>	<b>Category</b>	<b>Purpose of Sharing</b>	<b>Data Shared</b>
Hosting Party	Data Controller	For hosting the website	Encrypted data
Website Provider	Data Controller	For backing up the website	Entire website backup
Email Provider	Processor	For hosting emails	Encrypted data
Bank	Data Controller	To process payments for me	Name, address, payment details
Accounting System	Processor	To handle my accounting	Name, address, payment details, email address
Newsletter Provider	Data Controller	To send my mailings	Name, email address
Digital Calendar	Data Controller	To schedule digital appointments	Name, email address
Zoom	Data controller	For video calls and online consultations.	Name, email address, and information shared during sessions are processed by Zoom.
Videochannel	Data controller	To make use of videos	Name, email address, and information shared during sessions are processed by the channel

**Transfer of data to third countries**

I try to process personal data as much as possible within the EEA, but sometimes it is unavoidable to use services from outside the EEA (such as Google, social media, and Zoom). These companies are based in a country that the European Commission has recognized as providing an adequate level of protection.

With all processors, both inside and outside the EEA, a data processing agreement has been concluded. The parties are part of the EU-US Data Privacy Framework of the U.S. Department of Commerce. This means that there is an appropriate level of protection for the processing of any personal data.

## **Use of social media**

At my practice, I engage with various social media platforms to connect with clients and share valuable information. It is important for me to inform you about how your personal data is handled when interacting with my social media channels. The platforms I use for communication and engagement include Facebook, Instagram, LinkedIn, and other social media channels.

When you interact with my posts, share content, or communicate with me via direct messages, some personal data, such as your name, username, and any information you voluntarily share, may be collected by the platform.

These platforms are operated by third-party companies, and each has its own privacy policies and terms of service. I encourage you to review these policies, as they govern how your data is processed on these platforms.

However, I want to reassure you that any personal information I receive through social media is handled with care and in compliance with data protection regulations, including the General Data Protection Regulation (GDPR).

Please note that I do not use the information shared on social media for purposes other than responding to your inquiries, providing relevant information, and engaging with you about my services. Any data collected is kept confidential and is not sold or shared with other third parties without your consent, unless required by law.

If you have any questions about how your personal data is processed when using my social media channels or wish to exercise your rights under data protection laws, such as the right to access, correct, or delete your data, please feel free to contact me directly.

### **Your right to access, correct, or delete data**

You have the right to view, correct, or delete your personal data. You can email me with such requests. I will respond to your request as soon as possible, but in any case, within one month. If your request is specific or disproportionate, the deadline may be extended by 2 months.

### **Your rights to withdraw, object, and data portability**

You have the right to withdraw any consent you have given for data processing, object to the processing of your personal data by me, and the right to data portability. This means you can submit a request to have your personal data sent to you or another organization you specify in a computer-readable file.

## **Security**

I take adequate and appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized modification:

- No physical copies of your personal data are made.
- I always use secure Wi-Fi networks, unless this is not possible for important reasons.
- The number of devices with access to your data is limited to the necessary devices.

- The devices and systems used are all secured with a password and/or access code and/or fingerprint and/or facial recognition.

### **Poor security or misuse of your data?**

If you believe that your data is not properly secured, or if there are indications of misuse, or if you need more information about the security of personal data, please contact me.

### **Your right to file a complaint**

I would like to point out that you have the right to file a complaint with the national supervisory authority if you believe I am not complying with the privacy regulations as outlined in the GDPR.

The national supervisory authority is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). [You can file a complaint here.](#)

### **Cookies**

At my practice, I do not intentionally place cookies on your device. However, please be aware that certain external services or platforms used on my website may place cookies without my direct control. These cookies may be used for various purposes, such as improving user experience or tracking website usage.

I recommend that you check the cookie settings of your browser to ensure that you are aware of and comfortable with any cookies being placed. Most browsers allow you to manage and control cookies, including options to block them or delete them from your device.

For more details on how to manage cookies, please refer to your browser's help section or the relevant guidance on the website of the service provider.

If you notice cookies placed by third parties and have concerns, I advise you to contact the respective service provider or platform directly for more information on their cookie usage and how to manage them.

If you have any concerns or need assistance, feel free to contact me via [manja@manjaopdencamp.com](mailto:manja@manjaopdencamp.com).

### **Modifications**

The content on my website may be updated at any time due to ongoing developments. This also applies to my privacy and cookie statement. This version is from **January 20, 2025**, and if any changes are made, the most recent version will always be posted on my website.