



Privacy Policy

Last updated: 21 December 2025

This Privacy Policy explains how Pausa B.V. ("Pausa", "we", "us") collects, uses, shares and protects your personal data when you visit our website, apply for or participate in our programs and retreats, or interact with our community.

We act as a data controller under the EU General Data Protection Regulation (GDPR) and applicable Dutch data protection laws.

1. Who we are and how to contact us

Pausa ("Pausa", "we", "us") is a company incorporated in the Netherlands and operating within the European Union.

Contact details:

- Legal entity: Derevianko Holding B.V.
- Registered office: Maliestraat 1-5, 3581 SH Utrecht, the Netherlands
- Email: hello@pausa.pt
- Chamber of Commerce (KvK) number: 76514455
- VAT number: NL860653195B01

These Terms are governed by Dutch law and applicable EU law.

If you have questions or wish to exercise your data protection rights, you can contact us at the above address.

2. What data we collect

We aim to collect only the data necessary to provide and improve our Services. We do not intentionally collect medical records, diagnoses or other special categories of personal data as part of our standard processes.

We may collect the following categories of data:

2.1 Contact and identification data

- Name, surname
- Email address, phone number
- Country of residence, city
- Company name, role or job title

2.2 Application and program data

When you apply for a retreat or program, we may collect:

- Your answers to application questions (e.g., motivation, current leadership challenges, expectations)
- Preferences (e.g., retreat location, dates)
- Notes from intake conversations or onboarding calls (kept to a minimum and focused on program fit)

We ask you not to share sensitive medical or mental health information. If you choose to share such information, we will treat it with extra care, limit access and minimise retention.



2.3 Payment and billing data

- Billing address, company details (for invoices)
- Payment status and transaction identifiers
- We rely on third-party payment providers (e.g., Stripe) to process card details; we do not store full card numbers.

2.4 Community and interaction data

- Messages and posts you share in online community spaces (where applicable)
- Attendance at events and sessions
- Feedback you provide via surveys or emails

2.5 Usage and cookies

When you visit our website, we may automatically collect:

- Device and browser information
- IP address (in a truncated or anonymised form where possible)
- Pages visited, time spent, actions taken on the site

We may use cookies and similar technologies for basic analytics and site performance. Details are provided in our Cookie Notice (if applicable).

2.6 Progress and self-tracking (within programs)

In some programs we may offer tools for self-reflection or progress tracking, such as:

- Personal goals and check-ins
- Habit tracking data (e.g., “days practised a breathing exercise”)
- Notes you voluntarily record about your experience

These are designed for your benefit; we use aggregated or anonymised views where possible to understand program effectiveness.

3. Why we use your data and legal bases

We process your personal data for the following purposes and legal bases:

3.1 To provide and manage our Services (contract)

- Processing applications and registrations
- Communicating about retreats, programs and community activities
- Providing access to events, community spaces and materials
- Handling payments and invoicing

Legal basis: Article 6(1)(b) GDPR – performance of a contract or taking steps prior to entering into a contract.

3.2 To manage our relationship and customer support (contract / legitimate interest)

- Responding to your enquiries
- Sending important service updates (e.g., schedule changes, safety information)

Legal basis: Article 6(1)(b) and 6(1)(f) GDPR – our legitimate interest in providing reliable customer support and maintaining relationships.

3.3 To improve our Services and community (legitimate interest)

- Analysing aggregated participation and feedback
- Improving program design and facilitation
- Ensuring safety and integrity in community spaces



Legal basis: Article 6(1)(f) GDPR – our legitimate interest in improving quality and safety of our Services.

3.4 Marketing communication (consent / legitimate interest)

- Sending newsletters or updates about future retreats and programs, if you opt in
- Using your email to invite you to surveys or events relevant to services you already use

Legal basis: Article 6(1)(a) GDPR – your consent (for newsletters); Article 6(1)(f) GDPR – our legitimate interest in promoting similar services to existing clients, always with an easy opt-out.

You can unsubscribe from marketing emails at any time by using the link in the email or contacting us.

3.5 Legal and regulatory compliance (legal obligation)

- Retaining invoices and financial records for tax purposes
- Responding to lawful requests from authorities

Legal basis: Article 6(1)(c) GDPR – compliance with legal obligations.

4. Special categories of data

We do not intend to collect special categories of data (such as health, religion, sexual orientation or political opinions) as part of our standard Services.

Please avoid sharing medical diagnoses or sensitive details in application forms, emails or community spaces. If you voluntarily share such information (for example, to adjust an activity for your physical capacity), we will:

- Use it only for that specific purpose
- Limit who can access it
- Retain it only as long as necessary

Legal basis, where applicable: Article 9(2)(a) GDPR – your explicit consent; you can withdraw this consent at any time, but it will not affect processing already carried out.

5. Who we share data with

We only share your data with trusted parties where necessary to provide our Services, always under appropriate data protection safeguards. These may include:

- Service providers: payment processors, email and CRM tools, event platforms, online community tools, video conferencing providers, IT and hosting providers
- Facilitators and co-hosts: limited access to participant lists and relevant information needed to deliver a specific retreat or session
- Accountants and legal advisors: where necessary for financial and legal compliance
- Authorities: where required by law or to protect our rights or those of others

We do not sell your personal data.

Some service providers may process data outside the EU/EEA. In those cases, we ensure appropriate safeguards are in place, such as EU Standard Contractual Clauses or equivalent mechanisms.

6. How long we keep your data

We retain personal data only as long as necessary for the purposes described above or as required by law. For example:



- Application and program records: typically up to 3 years after the end of your participation, unless we need them longer for legal reasons or with your consent for future communication.
- Invoices and financial data: typically 7 years to comply with Dutch tax law.
- Community posts and progress data: while your account is active and for a reasonable period afterwards, or until you request deletion where feasible.
- Marketing data: until you unsubscribe or your consent is withdrawn.

We may keep anonymised or aggregated data (which cannot identify you) for longer for analytical and research purposes.

7. Your rights

Under the GDPR, and subject to certain conditions, you have the right to:

- Access your personal data and receive a copy
- Rectify inaccurate or incomplete data
- Erase your data ("right to be forgotten") in certain situations
- Restrict processing of your data in certain cases
- Object to processing based on legitimate interests or to direct marketing
- Data portability – receive data you provided in a structured, machine-readable format, and request that we transmit it to another controller where technically feasible

You also have the right to withdraw your consent at any time where processing is based on consent. This will not affect the lawfulness of processing before withdrawal.

To exercise your rights, contact us at

hello@pausa.pt

We may ask for proof of identity before acting on your request.

If you believe your data protection rights have been violated, you have the right to lodge a complaint with your local data protection authority or with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

8. Security

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction or alteration.

No system is completely secure, and we cannot guarantee absolute security, but we strive to apply best practices suitable for the size and nature of our organisation.

9. Cookies and similar technologies

Our website may use cookies and similar technologies for:

- Basic site functionality
- Anonymous or aggregated usage analytics

Where required by law, we will ask for your consent before placing certain cookies (e.g., non-essential analytics cookies). For more information, please refer to our Cookie Notice (if available) or contact us.



10. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website and will show the "Last updated" date.

If changes are significant, we may notify you by email or through the website. Continued use of our Services after changes take effect constitutes your acknowledgement of the updated Policy.

11. Contact

For questions, comments or requests regarding this Privacy Policy, please contact:

Email: hello@pausa.pt

Address: Maliestraat 1-5, 3581 SH Utrecht, the Netherlands