

Privacy Policy

We are Inchainge B.V. (**Inchainge**). We are convinced that the privacy of its candidates, employees, as well as of its other relations and visitors to the website is of vital importance. The Personal Data are therefore handled and secured with the greatest possible care, in accordance with the requirements set by EU law. In this privacy policy, we explain which Personal Data we use and why we use them. Furthermore, we describe how we save, protect and process these Personal Data.

This privacy policy applies to our website <https://inchainge.com> or any alias directing to this URL (the **Website**), our apps (the **Apps**) and the services we provide (the **Services**). We process your Personal Data in accordance with the General Data Protection Regulation (the **GDPR**) and all other relevant legislation and regulations in the field of protection of Personal Data, like the Dutch Telecommunications Act (*Telecommunicatiewet*) regarding the use of cookies. Hereinafter, we call all aforementioned legislation the **Relevant Legislation**.

Are you under the age of 16?

If you are younger than 16 years old, you need permission from your parents or legal guardian to use our Website and Services.

Personal data

In order to offer our Website, Apps and Services, we process Personal Data. The concept **Personal Data** means information by means of which one can directly or indirectly identify you as a person, This definition is in line with the Relevant Legislation. We only process special personal data (data relating to race, religion or belief, political opinion or health) if this is necessary to comply with our legal obligations, insofar as permission has been given there, or if this is otherwise permitted by or pursuant to the law.

Who is the controller of your Personal Data?

This privacy policy is issued by Inchainge. Inchainge is responsible for the Personal Data processing as set out in this privacy policy and therefore the **Controller** within the meaning of the GDPR.

Why are we allowed to process Personal Data?

There are several legal grounds under the Relevant Legislation for the lawfulness of processing of your Personal Data:

1. performance of the agreement;
2. your consent;
3. legitimate interests;
4. legal obligations.

Together, we call these the **Bases**.

Which Personal Data do we process and for which purpose(s) do we use them?

We need some of your Personal Data to provide you the use our Website, Apps and Services. We are allowed to process your Personal Data, because we comply with the Relevant Legislation, since we only use your Personal Data in accordance with the Bases.

We shall only use your Personal Data for the following purposes or for purposes closely connected to these purposes. By doing so, we will not use your Personal Data in an unexpected manner.

Personal Data	Purpose(s)	Base(s)
<u>Student, practitioner, teacher and trainer</u>		
<p><i>When registering on the Website:</i></p> <p>e-mail address, first name and surname, company name or name of the organization</p> <p><i>Optional - you may share other Personal Data on voluntary base. With a complete profile of you, we are able to provide you our full service.</i></p>	<p>We process your Personal Data for the following reasons:</p> <ul style="list-style-type: none"> - to register and provide you with an account; - to address you properly when we have contact with you; - to connect you with the organization that provides you its services as part of the fulfilment of the agreement you have with the organization; - to share information about our Services to develop your skills, we also share information about activities from third parties with purposes that are closely connected to our purpose; - to provide you our newsletter; you have the option to unsubscribe from the newsletter whenever you want; - to connect you with our payment service provider (we do not see or store your bank account details when you pay via our payment service provider). 	<ul style="list-style-type: none"> - Performance of the agreement - Legitimate interest - Legal obligations - Consent
<p><i>When we are providing you our games</i></p> <p>Name, game and test results and feedback on the game and test results</p> <p><i>Optional - you may share your test results with other participants of the test</i></p>	<p>We process your Personal Data for the following reasons:</p> <ul style="list-style-type: none"> - to execute the training program; - to share with you the results of your training; - to provide you feedback as part of the program <p><i>Optional:</i></p> <ul style="list-style-type: none"> - to develop skills such as providing and receiving feedback 	<ul style="list-style-type: none"> - Performance of the agreement - Consent
<u>Business relationships</u>		
<p><i>Personal data of business Relationships:</i></p> <p>e-mail address, first name and surname, company name or name of the organization/educational institution, address, bank account details</p> <p><i>This refers to the contact details of organizations, educational institutions and any other body with whom we maintain a business relationship.</i></p>	<p>We process these Personal Data to:</p> <ul style="list-style-type: none"> - provide information about our Services and other activities; - to enter into and maintain a business relationship with you and to carry out the relevant administration for this purpose; - to provide invoices and to fulfill out the relevant financial administration obligations 	<ul style="list-style-type: none"> - Performance of the agreement - Legal obligations - Consent

How do we get your Personal Data?

We receive Personal Data directly from you when you create an account on our Website and/or in our Apps, use our Services and other moments that you share Personal Data with us.

It is possible that you provide us with Personal Data of third parties. We would like to remind you that it is your own responsibility to verify if those parties agree with the provision of their Personal Data.

As far as it is permitted by law, it is possible that we receive (supplemental) Personal Data from external organizations. For more information see the chapter *third parties*.

Are you obliged to share your Personal Data with us?

In some cases, the processing of your Personal Data is necessary. For instance, when we offer our Services, when we execute the agreement with you or when we need to obey to legal obligations. If you choose not to share the necessary Personal Data with, then we are not able to execute the agreement with you and/or provide our Services to you.

Automatic decision-making

We do not make use of automatic decision-making.

How do we protect your Personal Data?

Inchange makes every effort to optimally protect your Personal Data against unauthorized use. We do this by means of physical, administrative, organizational and technical measures. If and insofar as Personal Data is provided to data processors who provide services or carry out orders on our behalf, Inchange has agreed with the data processors that they also provide optimum security for the Personal Data. If you have any questions, comments, complaints or (suspected) data leak, you can contact us by e-mail. You can also make use of the complaints procedure below. In the event of a (suspected) data leak, please report this immediately by e-mail to info@inchange.com.

Inchange attaches great importance to the quality of its Services. That is why we take every complaint seriously. If you have a complaint about our Services, we would be happy to receive it. This enables us to further optimize our Services. You can report a complaint via info@inchange.com with '*complaint*' as the subject. You will receive a response to the complaint within two working days. You can also submit a complaint about a violation of your privacy to the Dutch DPA at www.autoriteitpersoonsgegevens.nl/en.

How long do we store your Personal Data?

We shall store your Personal Data for as long as necessary to fulfil the purposes listed above.

With whom do we share your Personal Data?

Processor

We may share your Personal Data with third parties. We conclude a data processing agreement with these parties, which entails that they shall process your Personal Data carefully and that they shall only receive the Personal Data they need to provide their service. These parties shall only use your Personal Data in accordance with our instructions and not for their own purposes. We only share your Personal Data with our webhosting provider, our ICT-service provider, our marketing service provider, our payment service provider and our licensed partners who perform activities for our training programs. They shall process your Personal Data in order to provide respectively webhosting

services, ICT-services, marketing services, payment services and, respectively, to execute activities related to our training programs. These parties are 'processors' within the meaning of the Relevant Legislation.

Third parties

Sometimes we share your Personal Data with other parties, who are not a processor. With these parties, we agree that they shall use your Personal Data carefully. They shall only process your Personal Data compatible or in line with our purposes or with your consent. We may share your email address, first name and surname with The Talent Connection B.V. This company might invite you to use its services. We may share your contact details with our clients who are providing you their services in execution of an agreement that they have with you. Furthermore, we may share, only with your consent, your game and test results that we store as Controller with, for example, The Talent Connection B.V.

Countries

The Personal Data can be transferred outside The Netherlands. Inchainge has taken the necessary measures to ensure that the Personal Data transferred are adequately protected.

We shall only process your Personal Data within the European Union or with a country outside the European Union if that country offers an appropriate level of protection for your Personal Data.

We shall never transfer your Personal Data to other countries or to other parties than those mentioned above.

[Links](#)

Our Website may contain links to other websites. We are not responsible for the content or the privacy protection of these websites. Therefore, we advise you to always read the privacy policy of those websites.

[Cookies](#)

Our website can be visited without your Personal Data being passed on to us. Like many other websites, this website does automatically collect certain non-identifiable information about the users of the website, such as, for example, the Internet Protocol (IP) address of your computer. The IP address of your Internet Service Provider, date and time of access to the website, the Internet address of the website from which you were directly linked to our website, the operating system you use, the parts of the website you visit, the pages of the website you visited and the information you viewed, information about the type of device you use for your visit to the site, the geo-location where you are located and the material you send or download from the website. This technical information is used by the system administrator to manage the website and to improve the website and its use. This technical data may be passed on to third parties and may be stored permanently for future use.

[Modifications to the privacy policy](#)

We can modify this privacy policy. If we substantially modify the privacy policy, we shall place a notification on our Website, together with the new privacy policy. We shall notify registered users in case of a substantial modification. If you are not a registered user, we advise you to consult the Website and this policy regularly.

Your rights

When the data we collect and process is personal, you have the following rights:

- you can request access to your Personal Data;
- you can request us to correct, limit or delete your Personal Data. In the event of fraud, non-payment or other wrongful acts, we can store some of your Personal Data in a register or on a black list;
- you can request a copy of your Personal Data. We can provide this copy to third parties at your request, so you do not have to do so yourself;
- you can object to the processing of your Personal Data;
- you can file a complaint at the Dutch Data Protection Authority (DPA) if you are of the opinion that we wrongfully process your Personal Data;
- you can always withdraw your permission to process your Personal Data. From the moment of your withdrawal, we cannot process your Personal Data anymore.

Contact

In the event of other questions or remarks regarding our privacy policy, you can contact us by means of the following contact details.

Inchainge B.V.
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