



# ***Privacy Statement***

ACTIVE LIVING B.V.

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Dear reader,

You are a private person or an employee of a company\* and share personal data with us, or you intend to share personal data with us.

Do you want to know how we handle your privacy? If so, please read this privacy statement.

We prefer not to use difficult terms and complicated references to legislation. This statement is therefore written in as simple terms as possible. You will often come across the term "Vitlounge" in this document. Vitlounge is our online system containing your personal data.

Do you have any questions? If so, please call us or send us an email.

Kind regards,  
Active Living

*\*If you are an employee of a company, your employer will have an agreement with us; please contact your employer if you have any questions about this.*

# ***What is personal data?***

Personal data is information that reveals something about you or that we can link to you.

Examples include your name, date of birth, telephone number, email address and the data that we collect for the purpose of conducting our examinations. Another example is the IP address of your computer when you log in to our system. It concerns all data that we can link to you.

## **What do we mean by processing?**

The General Data Protection Regulation defines processing as: "collecting, recording, organizing, storing, updating, modifying, retrieving, consulting, using, forwarding, disseminating, making available, bringing together, linking, shielding, erasing and destroying data." As you can see, a lot of activities fall under processing. We therefore assume that all possible forms of contact between you and Active Living involve processing personal data.

# ***What do we process personal data for?***

We process your personal data in order to provide you with good service in the areas of health and vitality. We do so in the following ways:



## **Organization**

We communicate with you regarding all our projects and services - sometimes by email, text message or telephone, and through our Vitlounge system. All forms of communication require precision and we use your personal data for this purpose.



## **Conducting examinations and coaching**

In order to give you the guidance agreed upon with you or your employer, we need to receive health data from you. We use this data to offer you our services.



## **Legislation**

In most cases, we are required by law to store and retain information, and to make it accessible to you. In order to do so, we store this data. This data includes answers you have given in (medical) surveys, results of physical tests or reports on meetings between you and our lifestyle coaches.

# What do we process personal data for? Part II



## Improvement and innovation

We also use personal data to customize our services for you. We do this by combining and analyzing the data. These analyses provide us with new ideas and better solutions. We want to be at the forefront of this field. This allows us to help you and improve your health.



## Reporting

Your employer may ask us to draw up a report on the trends and results of the examinations. The purpose of this report is to advise your employer on how all employees can perform their work even more effectively. Naturally, we make all personal data anonymous (we 'pseudonymize' the data), so that a result can never be linked to you. Moreover, we will only include your data in the report if you give us permission to do so in Vitlounge.



## Research

We research the effect of our services, for example. Research may be conducted on the initiative of Active Living itself or when a client has a question. These research reports are always anonymous and the results are presented on a group basis, so the results can never be linked to you as a participant. We will only use your health data if you have specifically given us permission to do so; this applies to research as well.



# ***What personal data do we collect?***

## **Data about you as a person**

Examples include your name, date of birth, email address and sometimes your position within your company. We use most of this data to communicate with you and some of the data to mainly draw up a proper report for your employer.

## **Data about your mental health**

An important part of our service consists of conducting science-based surveys. These questionnaires provide you with insight into your mental health and provide our doctors and coaches with insight into your areas of development.

## **Data about your physical health**

Another important part consists of test data to provide information about your physical health. Examples include your cholesterol level, a lung function test or a resting ECG. The results show your current health status and/or risks.

## **Your use of our website and Vitlounge**

We use data about your visit to our website, such as your IP address, information about the device with which you log in and substantive data about your visit, to help you as quickly as possible when you encounter problems. For example, if you are unable to log in or to make an appointment, viewing this data will be useful to us and sometimes enable us to immediately solve a problem. We collect some of this data using cookies and ask permission for this when necessary. Please view our cookie statement on the website for more information about cookies.

## **Citizen service number**

In most cases, we will not require a citizen service number and will not ask for one. We only need this number for the Cool coaching track in order to submit claims to the health insurer.

# ***Who has access to your personal data?***

## **Active Living employees**

During our examinations, you will have contact with a test leader, doctor and/or coach. Project managers will work with your data behind the scenes and we also have to submit an invoice, of course. All Active Living employees have access to your personal data, but only the employees who really need it have access to your medical data. Everyone has signed a confidentiality agreement to treat your medical or **personal data carefully, and to never provide it to third parties without your permission.**

## **Our customers, your employer**

It may be useful for your employer to have insight into your personal data for some projects, e.g. to see whether a test day or schedule is filled. They do this directly in our system. We have, of course, properly shielded your medical data to ensure that they never have insight into it.

## **Other parties**

If you have granted permission for the use of marketing or statistical cookies, certain data, such as your IP address, will be transferred to companies outside the EU. This may also apply to other applications or systems that we use. We ensure that data is only shared with countries or organizations that guarantee an appropriate level of security.

# ***How have we secured your personal data?***

## **We ensure proper security**

We spend a great deal of time and money on ensuring the security of our Vitlounge and your personal data. We pay a lot of attention to the safe storage of all medical and personal data. After all, cybercriminals are getting smarter. A special team ensures that you can safely schedule your appointments online and complete your Vitlounge profile. We will also give you tips on how to keep your data safe yourself. What if something still goes wrong despite all precautions? Then we take action. We resolve and register data leaks. We report them to the supervisor and, if your data is affected, to you as well. The actual security measures that we take are secure connections, internal procedures for access to and handling of data, and proper password management. In addition, we have implemented a (certified) system for quality assurance.

## **We need your permission**

When you access Vitlounge for the first time, we will need your permission to store data. We are not allowed to store your medical data without your explicit permission. This permission therefore forms the legal basis for our processing of your (medical) data. After reading this document, you will hopefully understand that it is not possible to use our services without granting this permission. Since we want to do all of our processing digitally as much as possible, we can no longer make an exception to this requirement.

## **Withdrawing permission**

Once you have given us permission, you can always withdraw it by explicitly making this known to us. Where legally possible, we will immediately stop processing your data. You can also withdraw the permission yourself via your secure file under 'Data'.



# ***What can you change or delete yourself?***

## **Accessing or changing your data**

If you are a customer of Active Living, your data is safely stored in your own online profile in Vitlounge. You received a login code from us and we asked you to secure this code yourself with a password of your choice. Do you want to access or change your data? If so, please log in to Vitlounge. You can always export all medical data from Vitlounge, which is handy when you want to take the data with you to your doctor, for example. If you feel we are processing too much data, you can ask us to (temporarily) process less data.

## **Sometimes you cannot change data**

In the case of fire-department examinations, it is not always possible to directly change your personal data in Vitlounge. This is due to a link between Vitlounge and the personal data system of the fire department region. In this case, you can make changes directly in your fire department region and the change will appear in our system that same night.

## **Deleting Data**

Initially, we are legally required to retain your data for 20 years. If you would like us to delete your data earlier, you can indicate this in your profile on Vitlounge or send us an e-mail. We will then assess whether early deletion is possible in your specific case. If you are employed by a fire-department, a physician will evaluate whether your file can be deleted without objection. For Periodic Occupational Health Examinations (Dutch PAGO) where you, as an employee, have (potentially) been exposed to hazardous substances, we are required to retain the results for 40 years.

## ***Your data in the case of (scientific) research***



In the case of participation in or the use of your medical data for (scientific) research, we will ask you separately for permission in Vitlounge. You can therefore refuse to grant this permission and still use Vitlounge normally.

Research results will only be presented to potential commissioning parties in a statistical and aggregated manner, so that data can never be linked to a particular person.

If you do grant permission for research, a deviation from the aforementioned rights will apply, because a legal restriction applies in the case of research. This means that you cannot request access to the research data and therefore cannot impose restrictions on it or change it. This does not affect your rights to the data currently available to you in Vitlounge, of course. If you have granted permission for the use of your data for research, this data will be stored for 10 years after completion of the research.

## ***Not satisfied?***

Do you have any questions or complaints about the use of your personal data? Do you feel that we do not treat your personal data carefully, for example, or have you requested access to or any adjustment of your personal data, but are not satisfied with the response? If so, please notify us by email or by completing the contact form on our [website](#). Our data protection officer is Bas Teeken (info@privacyholder.nl). If we are unable to resolve the matter together, you can submit a complaint to the [Dutch Data Protection Authority](#).

-  **Contact form Active Living** <https://activeliving.nl/klachtenprocedure>
-  **Dutch Data Protection Authority** <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>