

# Privacy Statement



**Privacy Statement**  
January 2021

## Privacy Statement

DC Klinieken processes personal data and uses cookies and similar technologies. We strive to use your personal data carefully and securely within the limits of the law. In this Privacy Statement, we describe who we are, how and for what purposes we process your personal data, how you can exercise your privacy rights and anything else that might be important for you to know.

We use specific words in this Privacy Statement. Below we will explain what we mean by some of these words:

- **Personal data:** data that directly or indirectly says something about you. For example, your name, address and your medical information.
- **Processing:** anything that can be done with personal data. This includes the collection, but also the storage, use and deletion of your data from our records.
- **Data controller:** the person who determines the purposes for which and the manner in which any personal data are processed.

To keep the information understandable, each topic is divided into two layers of information. We have done our best to write down all the information in a clear and understandable manner. If you still have questions about our use of your personal data after reading the Privacy Statement, please feel free to contact us. You can read how to do this later in this statement.

We also recommend you read our separate Cookie Statement. In the Cookie Statement, we describe our use of cookies and similar technologies.

Finally, we would like to inform you that our services are evolving and so is our Privacy Statement. We therefore recommend that you check this Privacy Statement regularly for changes, so you know exactly where you stand. At the very bottom of this statement you can read when it was last amended.

## Who are we?

### *First layer:*

The Foundation Stichting DCA cooperates with various legal entities. Together with the head office in Amsterdam and 13 branches in the Netherlands, the group is called DC Klinieken. DC Klinieken is established in Amsterdam, 1108 JA at Kromwijkdreef 11, telephone number +31 (0)88 0100 900.

### *Second layer:*

The branches within the DC Klinieken group are located in the Netherlands and operate accordingly. The DC Klinieken group jointly offers various types of services. The Foundation, together with its companies, is the 'Data Processor' within the meaning of the law for the processing of the personal data described in this Privacy Statement.

## What personal data does DC Klinieken collect from me?

### *First layer:*

DC Klinieken collects different categories of personal data:

- Personal data (such as name, address, place of residence, e-mail address, telephone number)
- Medical information (such as reports in your file on your state of health)
- Payment and insurance details
- Interaction data (such as your contact with the Service Centre, the date you visited our clinic for treatment or digital and/or written correspondence. For example, when you fill out the contact form on our website).

### *Second layer:*

We receive the above-mentioned categories of personal data both directly from you and from third parties insofar as this is in accordance with the law.

## Personal data you provide directly to us

This includes:

- personal data you provide when you register for a first appointment with us.
- personal data that you provide when you make use of our health care services
- personal data that you provide as a result of visiting our website
- data that you provide in the context of correspondence, feedback, complaints, etc.

**What are the consequences in terms of privacy when you visit our website? In addition to the data that you may actively provide via one of the online forms, information is collected in various ways:**

### *Cookies*

When visiting our web pages, cookies are occasionally used. Cookies are stored in your browser to increase the quality of the service. The cookies we use are so-called “functional cookies”, which automatically lose their validity after your browser is closed and are deleted depending on the method set in your browser. You can adjust the use of cookies in your cookie settings or prevent it by changing this in your browser settings. However, this may limit the functionality of the web pages.

### *Special services for optimisation and sales and marketing purposes*

DC Klinieken also uses services to monitor the use of our website, so we can optimise it, and to obtain sales and marketing information: Google Analytics and Hotjar. These services place analytical cookies. In the cookie settings you can adjust which cookies you want to accept.

### *Google Analytics*

Google Analytics collects aggregated data on how visitors use our website. For instance, the pages people visit and how much time they spent on a page. We have not given Google permission to use this Analytics information for other Google services or to share it with others. The information collected by Google is made anonymous to the extent possible. As a part of this, only part of your IP address is processed (Anonymize IP). DC Klinieken applies the privacy-friendly setting of Google Analytics guidelines of the Data Protection Authority. The data collected by Google are stored on servers in the United States. Google has joined the Privacy Shield programme of the US Department of Commerce. This means that an adequate level of protection for the processing of any personal data is guaranteed. In addition, DC Klinieken has entered into a processing agreement with Google (Analytics). For more information, read the Google Analytics [Privacy Policy](#).

### *Hotjar*

Hotjar is mouse tracking software. This allows us to see how much time visitors spend on the website, which pages they visit, where they click on the page, how far they scroll and what their mouse activity is. Hotjar also collects the following information from visitors: type of device (=), screen resolution, web browser and operating system. We use this information to make it easier to analyse the data collected by Hotjar. Information entered by the user (such as: contact forms) is not collected or stored by Hotjar. All characters entered are automatically replaced by an asterisk (\*) to ensure your privacy.

The data collected by Hotjar are stored on servers in Malta. Malta is part of the European Economic Area (EEA). The processing of your data by Hotjar remains within the EU, whereby Hotjar ensures a level of protection that complies with European laws and regulations. For more information, read the [Cookie Policy](#) of Hotjar.

## Personal data about others that you provide directly to us

It may happen that you share the personal data of other persons with us. For example, the address or contact details of others. Please note that it is your responsibility to check whether these persons agree to provide their personal data to DC Klinieken.

## Personal data we receive from third parties

We may receive additional personal data, for example, from your general practitioner. But also via social media, websites or services of third parties, insofar as this is permitted by law, for example, because you have given your consent.

### **Minors and incapacitated persons**

If a patient is a minor and/or incapacitated, he or she is represented by another person. Specific rules apply to the exercise of patient rights by these representatives. In the regulations regarding representation, the law distinguishes between:

- minors under the age of 12;
- minors aged 12 and 16;
- minors aged 16 or 17 and incapacitated persons;
- adult incapacitated patients.

## **Does DC Klinieken also process sensitive personal data?**

### *First layer:*

DC Klinieken collects and processes personal data for the performance of the agreement(s) entered into with you for the provision of health care and the resulting administration, communication, scientific research as well as to comply with statutory obligations.

For quality and management purposes, DC Klinieken uses anonymous data to the extent possible and therefore no personal data.

### *Second layer:*

The different purposes, as defined above, are described in more detail below.

#### **a) To establish a patient relationship with you**

If you contact DC Klinieken because you require health care, we will need personal data. These are obvious details, such as your name, address and place of residence, but also your care needs.

#### **b) To maintain the relationship with you and to carry out internal assignments**

If you are a patient with us, we want to serve you properly. For this purpose, we process personal data. We use your name and address data, for example, to maintain contact with you or your contact person. However, we also perform so-called 'internal assignments'. These may include laboratory analyses, X-rays or an MRI scan.

#### **c) For consultation with internal and external medical specialists**

On some occasions, it may be necessary to contact a fellow medical specialist within DC Klinieken or an external specialist for consultation. In such cases, personal data such as analysis results will be exchanged.

#### **d) For the financial settlement of the health care provided**

We also need your name and citizen service number (CSN) in order to settle payment with you or with your health insurance company for the health care provided.

#### **e) To protect your and our property**

We also store recordings, for instance, from surveillance cameras. We do this, among other things, for crime fighting and quality control or to keep record of evidence. This surveillance is carried out both within the clinics of DC Klinieken and in our car parks.

#### **f) For attending an information meeting**

We regularly organise meetings on a particular disease or treatment. During these information meetings, you as a patient, your family or friends can receive information on the development of the disease and possible therapies. You can also exchange experiences with other visitors. You can register for these meetings via our website.

#### **g) To enter into and perform agreements with suppliers**

If you maintain contact with DC Klinieken for professional purposes, we may process your personal data. For example, to carry out a temporary assignment that requires you to access the hospital.

#### **h) To comply with legal obligations**

DC Klinieken may share data if it is required to do so by law. Examples are provisions in the Health Insurance Act, the Long-Term Care Act (Wlz), Health care (Market Regulation) Act (Wmg), Quality, Complaints and Disputes Act (Wkkgz) and the Act on the Use of the Citizen Service Number in Health care and the Public Health Act. The latter law, for instance, requires DC Klinieken to report a limited number of certain infectious diseases directly to the Municipal Health Services (GGD).

#### **i) For our business operations**

As a health care provider, it is important and necessary for us to have a good overview of our patient relationships. By processing your data, we can improve the quality of the health care we provide through quality control. For example, we will contact you via your e-mail address to ask you to share your experience with our clinic.

#### **j) Improving our services**

We record telephone conversations for training and coaching purposes, to improve our services, to check transactions, to prevent and combat fraud and to comply with legal obligations. The recorded phone conversations are not kept any longer than necessary. If a conversation has been recorded and is still available, you have the right to listen to the telephone conversation or to receive a transcript of it in the event of a dispute about the content of the recorded telephone conversation.

#### **k) For (medical) scientific research**

We do not collect more personal data than necessary for the aforementioned purposes. If we do not keep the data for these purposes, we may still keep the data for archiving purposes. This means that the data will only be used in legal proceedings or for historical, statistical or scientific purposes.

## **On what legal grounds does DC Klinieken base the processing of your personal data?**

#### *First layer:*

The General Data Protection Regulation contains an exhaustive list of legal bases justifying the processing of your personal data. Three of these legal bases apply to the processing of personal data by DC Klinieken. Our processing of your personal data takes place in order to perform the agreement, and/or based on a legitimate interest of DC Klinieken, your consent or the law.

#### *Second layer:*

##### **Performance of the agreement**

We use your personal data to perform the agreement for the provision of health care that you have with us.

##### **Legitimate interest**

We also use your personal data for legitimate interests of DC Klinieken. You can read more about these legitimate interests of DC Klinieken under the following heading.

##### **Consent**

With your consent, we may use your personal data for certain marketing activities such as sending a newsletter. You may, of course, withdraw your consent at any time. Under the heading "Can you withdraw your consent later?" you can read how to do this.

## **What is DC Klinieken's legitimate interest in processing your personal data?**

#### *First layer:*

The processing of your medical data is necessary to receive adequate treatment. And the processing of your personal data is necessary in order to maintain a good relationship between DC Klinieken and its patients, or for the reasonable business interests of DC Klinieken itself. For example, to inform our patients about new products, services and activities, or to defend the interests of DC Klinieken in possible legal proceedings.

#### *Second layer:*

To the extent possible, we will include and apply the so-called 'opt-out' option in our communications. This will allow you to easily notify us if you no longer wish to receive communication from DC Klinieken. Of course, you can also contact us via our Service Centre at +31 (0)88 0100 900 or via our contact form on the website.

## To whom does DC Klinieken provide your personal data?

### *First layer:*

DC Klinieken may provide your personal data to third parties in accordance with this Privacy Statement and the law. DC Klinieken will not disclose your personal data to third parties for their marketing purposes without your explicit consent.

### *Second layer:*

Your personal data may be received by the following categories of recipients:

#### **Group**

We may share personal data with our affiliates to jointly provide products and/or services (such as registration and patient support), to assist in the development of products, websites, applications, services, tools and communications, and to prevent, detect and investigate potentially illegal activities, violations of our policies, fraud and/or data security breaches.

Your data may also be used in an audit. This is an investigation in which the quality of our health care is tested. This audit may be carried out by DC Klinieken employees or by an external party. An audit is an obligation that arises from achieving and maintaining our quality marks. During an audit, it is sometimes necessary to inspect patient records. The persons performing these audits are obliged to sign a confidentiality agreement and a DC Klinieken employee is always present during this inspection. If you have any objections, please let us know.

#### **Authorities**

For example, regulators, tax authorities, police and other legal authorities. We may share your personal data:

- to comply with legal obligations or a court order; or
- if this is necessary for the prevention, detection or prosecution of criminal offences (such as fraud, deception or prosecution); or
- if this is necessary to enforce our policies or to protect the rights and freedoms of others.

#### **Health care service providers**

For example, your insurance company for the reimbursement of the care provided by DC Klinieken, or your general practitioner who is informed by DC Klinieken of the treatment plan and/or results.

#### **Other**

Any third party for whom we have received your permission to share your personal data (e.g. in the context of a cooperation), and/or of whom DC Klinieken is part, now or in the future, as a result of a reorganisation, merger or takeover.

## Are your personal data processed outside the EU?

### *First layer:*

In principle, your personal data will not be transferred outside the European Union. For those situations in which this is inevitable, DC Klinieken has taken the necessary measures to ensure that the transfer takes place in accordance with the applicable laws and legislation.

For the processing of personal data within the borders of the European Union, all European countries must comply with the same rules set out in the law, the aim of which is to ensure a consistent level of protection in the processing of personal data.

## How long will your personal data be stored?

### *First layer:*

Your personal data will be deleted when they are no longer necessary for the purposes described above. Moreover, DC Klinieken will under no circumstances store your personal data longer than legally permitted. In the case of medical data, this is usually 20 years. The retention period starts running at the time of the last modification of the file.

- The personal data provided via the contact form you complete when you contact us are deleted within one month after the contact took place, unless the data needs to be stored for further feedback/future contact;
- Personal data provided when applying for a job, will be stored for no longer than one month after the application procedure has ended, unless the applicant gives consent to store the personal data for one year after the application procedure has ended.

*Second layer:*

**Category of personal data and retention period**

- Personal details - 20 years
- Medical data - 20 years
- Payment and insurance details - 7 years

## How can you manage your personal data?

*First layer:*

You have the right to view, correct and/or delete any of your personal data that has been collected by DC Klinieken. In addition, you can exercise the following rights: the right to restrict your personal data processing, the right to the portability of your personal data and the right to object. Below you can read where and how you can exercise these rights.

*Second layer:*

If you have your own account at DC Klinieken, you will access to part of the personal data registered about you. You can correct or delete some of the data at any moment, including making changes to your account details.

**Future plans at DC Klinieken**

If you wish to view the processing of all your personal data and/or wish to correct or delete data (to the extent that this is permitted) that you cannot modify yourself, please contact our Service Centre.

If you do not have an account, you contact our Service Centre to exercise your right to access, correct or delete personal data registered about you.

To exercise your right to restriction of the processing of your personal data, your right to data portability or your right to object the processing of your personal data, you may also submit a request to our Service Centre. Contact the Service Centre: +31 (0)88 0100 900 or via our contact form on the website.

Please note that DC Klinieken may request additional information to verify your identity.

## Can you withdraw your consent later?

*First layer:*

If you have given consent for a certain type of processing of your personal data, you may withdraw this consent at any time. Keep in mind that the withdrawal of your consent does not have retroactive effect and that you can only withdraw your consent if you have given it first.

*Second layer:*

You can inform us of the withdrawal of your consent via our Service Centre at +31 (0)88 0100 900 or via our contact form on the website.

## Can you file a complaint?

*First layer:*

For questions or complaints about the processing of personal data by DC Klinieken, please contact the Data Protection Officer via [privacy@dcklinieken.nl](mailto:privacy@dcklinieken.nl), the Complaints Officer via [klachtenfunctionaris@dcklinieken.nl](mailto:klachtenfunctionaris@dcklinieken.nl) or, if you are not satisfied with how the complaint is handled, the Data Protection Authority.

*Second layer:*

You can submit your complaints to the Dutch Data Protection Authority via the website [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

## How does DC Klinieken use profiling?

*First layer:*

DC Klinieken does not use profiling and/or other automated decision-making.

## When was this Privacy Statement last amended?

This Privacy Statement was last amended in January 2021.

**DC Klinieken**  
*Goede zorg, nu!*