



Intercultural Business Improvement

GDPR Privacy Policy

1. Introduction

This is the privacy policy for Intercultural Business Improvement b.v.. We are committed to protecting the privacy of our clients and participants of our programmes and treat their (special category) personal data appropriately. This privacy policy will explain:

- What (special category) personal data we collect and how we collect it
- How we use the (special category) personal data
- How we store the (special category) personal data
- Your data protection rights
- How to contact us
- Website and online interactions with us.

2. Personal information collection

For the purposes of the General Data Protection Regulation (GDPR), IBI is the "data controller".

The personal data we collect includes, but is not limited to:

- (special category) personal data provided to us voluntarily for the purpose of registering and accessing our services. This can include, but is not limited to: names, address, organizational data, e-mail and telephone numbers.
- (special category) personal data provided to us by employers for the purpose of offering or executing our services for their employees. This can include, but is not limited to: names, e-mail addresses, other contact information, nationalities, employer, function, place of residence, future place of residence, similar personal data about family members (partner and children),
- (special category) personal data suppliers and/or participants of our programmes share voluntarily with us during email correspondence, phone calls, the intake procedure, online training programmes, coaching, trainings or consulting sessions, evaluation forms, and other moments of contact with our organization. This can include, but is not limited to: names, e-mail addresses, other contact information, nationalities, employer, function, past employers and functions, place of residence, past places of residence, future place of residence, highest level of education, similar personal data about family members (partner and children), date and place of birth, political convictions, religious convictions, ideology, gender, health, marital status.

2.1. Using personal information

We may use your personal information to:

- Contact (potential) clients and participants regarding our services



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- Customize our training, coaching and consulting services to fit organizations and participants needs, including adapting the content of the services and selecting appropriate experts, coaches or trainers
- Send questions, updates and notifications relating to services
- Send news and communications about other services
- Evaluate and improve our services
- For promotional purposes, but only if permission has been explicitly given.

2.2. Lawful basis

We collect, store and use (special category) personal data on the following lawful bases:

- **consent:** We specifically ask consent before we collect the data that is voluntarily shared (online) with our organization or representatives thereof. In case we receive personal data from a third party, such as an employer sharing personal data from an employee, the lawful base on which we accept consent is the employment agreement that exists between you and your employer.
- **legitimate interests:** we may process information on the basis that there is a legitimate interest, either to you or to us. Where we process your information on this basis, we do after careful consideration whether the same objective could be achieved through other means and whether you would expect us to process your data, and whether you would consider it reasonable to do so. For example, in order to deliver our services for your benefit, we may share your personal data with a trusted third party organization for the purpose of our business activities or to conduct a survey to better understand your needs and requirements.

2.3. Where your data is stored

We store your data on our secure servers in the EU. It may also be stored outside of Europe, where it could be viewed by our staff or suppliers. For example when the participants or suppliers of the service related to the exchange of personal data are located outside of Europe, or when the service takes place outside of Europe. We obviously take the necessary security measures to protect your personal data. By submitting your personal data, you agree to this.

2.4. Information disclosure

Through our business activities, we may disclose your personal information to organizations, employees, freelancers for purposes directly related to the management and delivery of our services. Those in question will be obligated to use the personal information in accordance with the terms of this privacy statement.

We may also need to disclose your information if required to do so by law and for the purpose of defending our legal rights (including providing information to others for the purposes of fraud prevention).



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2.5. Information protection

We take all reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information. All personal information is stored securely in accordance with the principles of the General Data Protection Regulation.

By using our services, you acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. Of course we have taken all measures possible to prevent anything happening to your personal data.

In case you need passwords to enter our application portal and access our website, you are responsible for keeping the password you use confidential; we will not ask you for your password.

2.6. Cross-border data transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate to enable the use of the information in accordance with this privacy policy.

In addition, personal information that you submit for publication on the website will be published on the internet and may be available around the world.

You agree to such cross-border transfers of personal information.

2.7 Data retention period

Many of our clients and participants are repeating customers for whom we tailor our services based on the personal information gathered in the past. This information is also used for analysis and product improvement. Therefore we will not delete personal data, unless this is explicitly requested or whenever we no longer deem the information relevant for the above mentioned purposes.

3. Your individual rights

Under the GDPR your rights in relation to the personal data we hold are expressed as follows. You have:

- the right to be informed about how we use your personal data
- the right of access to the data we hold
- the right to rectification of any data we hold
- the right to erasure of your data
- the right to restrict processing of your data
- the right to data portability of your data
- the right to object, and



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- the right not to be subject to automated decision-making including profiling.

If you would like any further information about your rights, please contact us by sending an e-mail to info@ibinet.nl.

3.1. Accessing your personal information

Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulation (GDPR). If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to, and
- let you have a copy of the information in an intelligible form. You may request a copy of the personal information by emailing us at info@ibinet.nl.

3.2 Withdrawing your consent

You may exercise your right to withdraw your consent in relation to your personal data being used at any time by written notice to us via email to info@ibinet.nl or by way of letter to:

Intercultural Business Improvement b.v.
Van Hengellaan 2
NL 1217 AS Hilversum

By withdrawing your consent this does not affect the lawfulness or processing based on consent before its withdrawal.

4. Visitors to our websites

4.1. Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently (e.g. by recognizing a user's device), as well as to provide analytical information about the sites usage.

This website uses standard cookies, such as:

- Cache the site to assist with site speed and page load times
- Identify known hacking bots and prevent them from accessing the site
- Data stickiness on form entry
- Google Analytics
- User's language or font size preference

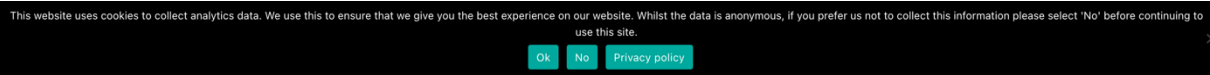


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We do not use cookies in remarketing advertising campaigns. In other words, we do not collect or use Facebook pixels or Google ad tags to send you personalised online advertisements.

4.2. Disabling or deleting cookies

This website has a cookie notification which is visible at the bottom of the website on your first visit. The notification is re-displayed one month after your first visit and every month there-after.



The notification allows you to accept or reject cookies on this site.

You can also clear your browser's cache or history to delete cookies on your device.

If you disable cookies or delete cookies the functionality of the website may be affected.

4.2. Google Analytics cookies

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyze how users use this site, for example:

- How many visits a website page has
- how long, on average, visitors stay on a webpage
- whether visitors are new or returning users
- the type of device and browser being used.

Information about your use of the website will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Your IP address is anonymized so the information generated by the Google Analytics cookie does not identify you. More information on how Google Analytics anonymizes IP addresses is available at <https://support.google.com/analytics/answer/2763052?hl=en>.

You can prevent your data from being used by Google Analytics with the Google Analytics opt-out browser add-on. Details available at: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.



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5. Contact Form and Newsletter

We collect names and email addresses via online contact and newsletter subscription forms.

Your email address will be added to the list of subscribers only with your explicit consent. Subscriber details, including first name, business name, email address and country are added to our MailChimp newsletter list. You can read MailChimp's data processing information here <https://mailchimp.com/legal/data-processing-addendum/>.

You can unsubscribe from our newsletter by sending an e-mail to info@ibinet.nl or use the unsubscribe link in the newsletter.

If you fill out a contact form on the website or send us an email, the data you provide will be retained for as long as is necessary depending on the nature of the form or the content of your email, to fully answer and correctly handle your message or email.

6. Social Media

Our website contains buttons to promote ('like') or share ('tweet') webpages on social networks like LinkedIn and Twitter. These buttons work through snippets of code originating in LinkedIn or Twitter that place cookies in your browser. We have no influence on this. Read the privacy statements of LinkedIn and Twitter (which can change frequently) to find out what they do with the data they gather through these cookies.