



Privacy statement Nova House Foundation

- 1. About Nova House:** Nova House is an independent health care organisation that facilitates assisted living and support for people who have completed a treatment programme for addiction problems in a treatment clinic, and wish to reintegrate into society.
- 2. Our role in processing personal data:** Nova House is a certified residential care centre. We process personal data when we apply for care under the Social Support Act (Wet maatschappelijke ondersteuning or Wmo) with the local authorities, on behalf of a client and with the client's consent. In this context, we are only processor of personal data. We keep files of our clients for treatment purposes. In this context, we are controller of personal data.

We are responsible for controlling personal data in the following contexts:

- Offering support to clients during their stay in Nova House.
- Performing agreements under the employment law with our employees.

We are responsible for processing personal data in the following context:

- Applying for care under the Social Support Act (Wmo) with the local authorities.

- 3. Which personal data do we process:** When you apply for the Nova House programme, or if your therapist or practitioner applies on your behalf, we ask for your personal data in order to perform our services. These personal data are provided to us by you or your therapist or practitioner.
 - Contact details: to process your application for our services we need your contact details. We use this information to communicate with you about your application.
 - Citizen service number (Burgerservicenummer or BSN): In some cases we also process your BSN. We only do this if we have a legal basis. We will inform you when we process your BSN and on which legal basis we do this.
 - Medical data: We need your medical data to be able to assess your application. With your consent, your therapist or practitioner will provide us with your medical data.
 - Motivational letter: In order for us to be able to assess your application, we will ask you to motivate the reason for your application in writing.
 - Counselling reports.

You will be asked to sign a declaration of consent for the processing of your personal data in internal reporting. With this declaration, you give permission to share your personal data with your therapist or practitioner, and to start the application process for care under the Social Support Act (Wmo) with the local authorities on your behalf.

Please visit our website for more information. We do not use any technologies to monitor your activities on our website.



- 4. How do we obtain your personal data?** In most cases, you provide us with your personal data yourself. We obtain your medical data via your therapist or practitioner. In our processing register, we set out from which sources we have received your personal data, as far as we know which sources these are. We will inform you on the sources of the information as much as possible.
- 5. Why do we process your personal data?** We process your personal data to be able to perform our services. We process your personal data to be able to contact you in the context of the performance of our legal and contractual obligations. We also process personal data to be able to support you during your reintegration process.
- 6. On what legal basis do we process your personal data?** We are only allowed to process your personal data if we have a legal basis. We use the following bases: Processing is necessary for the performance of the agreements we have made with you. For some processing procedures we will ask your specific consent, for instance to apply for care under the Social Support Act (Wmo) with the local authorities. For employees, there is a legal obligation to process personal data as well.
- 7. How do we secure personal data?** We handle your personal data carefully, and have taken technical and organisational measures to secure your personal data against loss or unlawful processing. We have taken, for example, measures to secure the use of our website and IT systems, and to avoid misuse. We have an information security policy in place, and we make sure that our employees have knowledge in the field of personal data protection. Only authorised employees are allowed to access and process your personal data. We have made agreements with suppliers of our software and IT systems to ensure at least the same level of data security. All our employees have signed a confidentiality statement. This means all employees have declared to comply with rules and regulations and codes of ethics with regards to confidentiality and handling personal data.
- 8. How long do we store your personal data?** We do not retain your data any longer than necessary. In some cases, we are legally obligated to retain your data for a certain period of time. In other cases, we have determined ourselves how long we need to retain your data. For this, we have drawn up a policy regarding retention periods.
- 9. To whom do we transfer your personal data?** We only transfer personal data to third parties if we have a legal basis to do so, and if it is necessary to ensure our normal operations. We transfer personal data to • employees of Nova House that are directly involved with day to day support • therapists, practitioners and other specialists that are involved in recovery treatment and reintegration of clients of Nova House • processors of personal data in the context of our services, for example the Sociale Verzekeringsbank (SVB) that processes an indication for assisted living.



We may also outsource the processing of personal data to third parties. Under the law, these third parties are processors of personal data. For instance, we use IT service providers for maintenance and support services. Such parties are considered as processors, because they do not control the personal data in the context of our services. In that case, we are responsible for a careful processing of personal data.

10. What are your rights? Pursuant to the General Data Protection Regulations (GDPR) you have the right to access your personal data. This right includes:

- Access to and rectification of personal data. You have the right to request access to your personal data, and to have incorrect data rectified or erased.
- Verification of your identity. When you send us a request to access, rectify or erase your personal data, we may ask you to send us a copy of your identification document. We advise you to black out your photo, MRZ (machine readable zone, the strip with numbers at the bottom of your identification document), passport number and BSN in this copy. We also recommend that you state on this copy that the purpose of the copy is to exercise your rights with regards to your personal data.
- Erase personal data and the 'right to be forgotten'. In certain cases and under certain conditions you have the right to ask us to erase the personal data we have stored of you. This is the case if • your personal data are no longer needed for the purpose for which these were collected or processed • you have a well-founded objection against the processing • we have illegally processed your personal data • we are legally obligated to erase the personal data.
- The right to be forgotten is not an absolute right. We may decide not to fulfil your request, and therefore not erase your personal data, if your request is not based upon one of the above mentioned grounds, or (i) to exercise the right of freedom of speech and information; (ii) to comply with a legal obligation; or (iii) for the establishment, exercise or defence of legal claims. We may also be legally obligated to retain personal data in our archives.
- If we do not fulfil your request to erase your personal data, we will inform you on the reason(s) of this.
- Restrict the processing. If you believe that we process your data unlawfully, or that the data we have processed are incorrect, you can request that we restrict the processing. This means that we are no longer allowed to process the data.
- Transfer of personal data (data portability). You have the right to receive a copy of the personal data you have provided to us in the context of the performance of the agreement we have made. This only concerns personal data we have obtained directly from you, and does not concern personal data we have received from third parties. The purpose of this right is to enable you to transfer these data to other parties.
- Right to object. You always have the right to object to the processing of your personal data if these are processed in the context of our legitimate interest or in the legitimate interest of a third party. In that case, we will no longer process your personal data unless there are justified grounds for the processing that may override your rights, or in the context of the establishment, exercise or defence of legal claims.



11. Changes to our privacy statement. Privacy regulations are always changing. We reserve the right to make changes to this privacy statement, to ensure we remain up-to-date. We adjust our privacy statement in case of, for example, a change in our business activities, a change in the law or in case of new jurisprudence. We recommend that you read our privacy statement regularly when visiting our website. We always publish the latest version on the website. We will inform you on changes in the privacy statement through a pop-up banner, email or newsletter.

12. Questions or complaints. Do you have questions about this privacy statement, or complaints about privacy? Please feel free to contact Nova House Foundation. Send an email to: info@nova-house.nl. You can also file a complaint with the Dutch Data Protection Authority via their website www.autoriteitpersoonsgegevens.nl or contact them via telephone on telephone number 0900-2001201.

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