

PRIVACY STATEMENT VALEBO! (February 2018)

GENERAL INDUCEMENT

1. The EU has completed a comprehensive reform of data protection regulation in Europe, as from May 25th 2018. The reform rests on several pillars (key components): coherent rules, simplified procedures, coordinated actions, user involvement, more effective information and stronger enforcement powers.
2. In order to ensure a consistent and high level of protection of natural persons and to remove the obstacles to flows of personal data within the Union, the level of protection should be equivalent in all Member States.
3. VALEBO! endorses the Guidelines on the application and setting of administrative fines for the purposes of the Regulation 2016/679, adopted on 3 October 2017, and recorded in article 29 Data Protection Working Party.
4. In line with the risk-based approach embodied by the GDPR, carrying out a DPIA is not mandatory for every processing operation. A DPIA is only required when the processing is “likely to result in a high risk to the rights and freedoms of natural persons” (articles 10, 11 and 12).

PURPOSE

5. The purpose of the website as a marketing tool is providing information and knowledge for human resources development:
 - Developing learning in organizations for personal and societal sustainable transformation: working and learning are one;
 - Maintaining dynamic equilibrium in people, in exploration and creativity and in result orientation and realism through specialized training and coaching;
 - Supporting executives in building a value-driven organization based on the latest insights into executive coaching, assessments and leadership development;
 - To promote the exchange of knowledge and experiences between people, departments and organizations.
6. In DigitCoach.com only name, email-address and password of a coachee is stored. Optional by free choice of the coachee is an additional facial photograph. By accepting the system link that gives entrance to the system (article 7) the coachee shares content with the e-coach in the dialogues, personal coaching goals and workbook. Articles 12, 13 and 14 will be applicable then.

CAREFUL DESIGN

7. Clients give permission to the use of personal data by delivering these in some forms on the website of VALEBO!. There is no obligation, anyhow, to use the website of VALEBO!, with the exception of the possible purchase of training, coaching and materials in general.
8. The design of the website of VALEBO! secures privacy: login is protected by the implementation of digital security by:
 - a. Privacy by design: all passwords and user-id's are stored encrypted in 32 characters;
 - b. Data protection: by encryption and authentication
 - c. Impact assessment: VALEBO! has no connections with social media, is stand-alone. Possible leaks might occur in the combination of name and password and personal data in some forms, which are only filled in by the 'visitor' of the website www.valebo.eu. No credit card information and other personal data than the above mentioned are stored in the website.
 - d. On 'www.valebo.eu/accreditation' only specially designated people are invited to deliver personal information, in order to certify for professional coach and to gain access to the DigitCoach e-coachsystem. This information will be removed from the 'accreditation' page and the 'internal www.valebo.eu information system' immediately after delivery.
9. The hosting of the e-coach software is hosted by STRATO (cloud service) of which the servers are stated in Germany.

OBLIGATIONS

10. VALEBO! will keep track of program changes as far as it influences personal data or conflicts with article 4.
11. Data controllers and data processors involved in the creation and maintenance of VALEBO! have increased responsibilities to ensure that personal data of the individuals is protected effectively. The one and only controller, designer and superuser on this moment (2018) is Chris Laarman, owner of the DigitCoach.com project.

CLIENTS RIGHTS

12. Clients of VALEBO! have *the right to forgetfulness*: they always have the right to ask the owner and/or the e-coach of VALEBO! to delete their personal data. Later, they can also require the organization to pass on the removal to all other organizations that might have received this data from VALEBO!. VALEBO! however does not sell any information to others, ever.
13. Clients of VALEBO! have *the right to data portability*: they will always be entitled (under certain conditions) to receive their personal data in a standard format from VALEBO!.

14. Clients of VALEBO! have *the right to see and change personal information and data*. However, the only information needed in VALEBO! shall only be the name of the client, his/her own (changed) password and date and hour of coach-dialogues.

EU GUIDELINES (SUMMARY)

15. Supervisory authorities have powers to ensure that the principles of the **General Data Protection Regulation** (GDPR) as well as the rights of the individuals concerned are upheld according to the wording and the spirit of the Regulation.

16. The WP29 proposes the following criteria which data controllers can use to assess whether or not a DPIA, or a methodology to carry out a **Data protection impact assessment** (DPIA), is sufficiently comprehensive to comply with the GDPR:

- **a systematic description of the processing is provided (Article 35(7)(a)):**
nature, scope, context and purposes of the processing are taken into account (recital 90); personal data, recipients and period for which the personal data will be stored are recorded; a functional description of the processing operation is provided; the assets on which personal data rely (hardware, software, networks, people, paper or paper transmission channels) are identified; compliance with approved codes of conduct is taken into account (Article 35(8));
- **necessity and proportionality are assessed (Article 35(7)(b)):**
measures envisaged to comply with the Regulation are determined (Article 35(7)(d) and recital 90), taking into account:
 - measures contributing to the proportionality and the necessity of the processing on the basis of:
 - specified, explicit and legitimate purpose(s) (Article 5(1)(b)); lawfulness of processing (Article 6); adequate, relevant and limited to what is necessary data (Article 5(1)(c)); limited storage duration (Article 5(1)(e));
 - measures contributing to the rights of the data subjects:
 - information provided to the data subject (Articles 12, 13 and 14); right of access and to data portability (Articles 15 and 20); right to rectification and to erasure (Articles 16, 17 and 19); right to object and to restriction of processing (Article 18, 19 and 21); relationships with processors (Article 28); safeguards surrounding international transfer(s) (Chapter V); prior consultation (Article 36).
- **risks to the rights and freedoms of data subjects are managed (Article 35(7)(c)):**
 - origin, nature, particularity and severity of the risks are appreciated (cf. recital 84) or, more specifically, for each risk (illegitimate access, undesired modification, and disappearance of data) from the perspective of the data subjects:
 - risks sources are taken into account (recital 90); potential impacts to the rights and freedoms of data subjects are identified in case of events including illegitimate access,

undesired modification and disappearance of data; threats that could lead to illegitimate access, undesired modification and disappearance of data are identified; likelihood and severity are estimated (recital 90);

- measures envisaged to treat those risks are determined (Article 35(7)(d) and recital 90);

○ **interested parties are involved:**

- the advice of the DPO is sought (Article 35(2));
- the views of data subjects or their representatives are sought, where appropriate (Article 35(9)).