

# **Privacy statement**

# **About our Privacy Statement**

CRE8 Academy cares deeply about your privacy. We only process data that is necessary for (improving) our services and handle the information we have collected about you and your use of our services with care. We never provide your data for commercial purposes to third parties.

This privacy policy applies to the use of the website and the services provided by CRE8 Academy. The effective date of these terms is 05-01-2024, and publishing a new version renders all previous versions invalid. This privacy policy describes the data we collect about you, how we use this data, and under what conditions we may share this data with third parties. We also explain how we store your data, protect it from misuse, and outline your rights regarding the personal information you provide to us.

If you have any questions about our privacy policy, you can contact us using the contact information at the end of our privacy policy.

# **Data Processing**

## Membirds

Our website is developed with Membirds software. Personal data you provide to us for our services is shared with Membirds. Membirds has access to your data to provide us with technical support, and they will never use your data for any other purpose. Membirds is obligated, based on the agreement we have with them, to take appropriate security measures. These measures include the use of SSL encryption and a strong password policy. Membirds uses cookies to collect technical information about your use of the software, without collecting or storing personal data. Membirds reserves the right to share collected data within its own group to further improve services. We have entered into a data processing agreement with Membirds.

### Mailgun

We send our transactional emails using Mailgun. All confirmation emails you receive from our website are sent via Mailgun servers. Mailgun will never use your name and email address for its own purposes. Your personal data is securely transmitted, stored, and accessed by Mailgun.

#### Mollie

For handling payments on our website, we use the payment provider Mollie. This involves processing your name, address, location details, and payment information such as your bank account or credit card number. Mollie has implemented appropriate technical and organizational measures to protect your personal data.

# Active Campaign

The marketing automation system used is Active Campaign. This database system stores data about individuals or companies, including: Name, Position, Company Name, Email address, Phone number, Website, and Address. With your permission to install cookies, it also tracks the pages you visit on the website, allowing us to offer content that suits your interests. Our newsletters and email campaigns are also sent using Active Campaign. We track who clicks on which link to see which type of content resonates best with the newsletter/campaign audience.

# **Purpose of Data Processing**

# **General Purpose of Processing**

We use your data exclusively for our services. This means that the purpose of processing is always directly related to the assignment you provide. We do not use your data for (targeted) marketing. If you share data with us and we use this data to contact you at a later time, other than at your request, we will explicitly request your permission. Your data will not be shared with third parties, except to comply with accounting and other administrative obligations. These third parties are bound to confidentiality based on the agreement between them and us or a legal obligation.

### **Automatically Collected Data**

Data automatically collected by our website is processed to further improve our services. This data (such as your IP address, browser, and operating system) is not personal data.

### **Cooperation in Tax and Criminal Investigations**

In some cases, CRE8 Academy may be obliged to share your data due to a legal obligation for fiscal or criminal investigations by government authorities. In such cases, we are obliged to share your data, but we will resist this within the legal possibilities.

#### **Retention Periods**

We keep your data for as long as you are a client of ours. This means that we keep your client profile until you indicate that you no longer wish to use our services. If you indicate this to us, we will also consider it as a request to be forgotten. Based on applicable administrative obligations, we are required to keep invoices with your (personal) data, and we will keep this data for as long as the applicable term runs. However, employees no longer have access to your client profile and documents we have created based on your assignment.

# **Your Rights**

According to current Dutch and European legislation, you have certain rights regarding the personal data processed by or on behalf of us. Below, we explain what these rights are and how you can invoke them.

In principle, to prevent abuse, we send copies of your data and copies only to your already known email address. In the event that you wish to receive the data at a different email address or by post, we will ask you to identify yourself. We keep a record of handled requests, and in the case

of a request for forgetting, we record anonymized data. You will receive all copies and copies of data in the machine-readable data format that we use within our systems.

You always have the right to file a complaint with the Dutch Data Protection Authority if you suspect that we are using your personal data in the wrong way.

## **Right of Access**

You always have the right to view the data that we (or third parties on our behalf) process and that relate to your person or are traceable to you. You can request this from our private affairs contact person. You will receive a response to your request within 30 days. If your request is granted, we will send you a copy of all data with an overview of the processors who have this data, stating the category under which we have stored this data.

### **Right to Rectification**

You always have the right to have the data that we (or third parties on our behalf) process and that relate to your person or are traceable to you, adjusted. You can request this from our private affairs contact person. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation that the data has been adjusted.

### **Right to Restriction of Processing**

You always have the right to have the data that we (or third parties on our behalf) process that relates to your person or is traceable to you, restricted. You can request this from our private affairs contact person. You will receive a response to your request within 30 days. If your request is granted, we will send you a confirmation that the data will no longer be processed until you lift the restriction.

### **Right to Data Portability**

You always have the right to have the data that we (or third parties on our behalf) process and that relate to your person or are traceable to you, carried out by another party. You can request this from our private affairs contact person. You will receive a response to your request within 30 days. If your request is granted, we will send you copies or copies of all data about you that we have processed or have processed on behalf of us by other processors or third parties. We can probably no longer continue to offer the service in such a case because the secure linking of data files can no longer be guaranteed.

# **Right to Object and Other Rights**

In certain cases, you have the right to object to the processing of your personal data by or on behalf of CRE8 Academy. If you object, we will immediately stop data processing pending the handling of your objection. If your objection is well-founded, we will provide you with copies and/or copies of data that we (or third parties on our behalf) have processed, and then we will permanently stop the processing. You also have the right not to be subject to automated individual decision-making or profiling. We do not process your data in such a way that this right applies. If you believe otherwise, please contact our private affairs contact person.

# Cookies

### **Google Analytics**

We use the Google Analytics pixel, but we have completely anonymized the information measured by it. Your IP address is anonymized by default, and we do not share this information with third parties, including Google itself. We do not create profiles based on user behavior for marketing purposes, and we do not track your data across multiple devices. Cookies are placed to gain a better understanding of visitor behavior on our website, improving the user experience. Google is not allowed to share the data obtained or use it for other Google services, and we anonymize IP addresses.

### Facebook

This website uses a Facebook Pixel, an analysis tool from Facebook. This tool helps us analyze the website, allowing us to improve the Facebook experience for our users. The information generated by this cookie is sent and stored on Facebook servers. Facebook uses this data to create bulk reports on the website usage of all users, not with your IP address. The cookie only stores information such as: which Facebook users visit the website, which pages these users visit, etc. This pixel also tracks user behavior after seeing or clicking on a Facebook ad, helping Facebook evaluate the effectiveness of ads. Thanks to the pixel, we can also show website visitors an ad on the Facebook platform. The data obtained is anonymous for us and does not provide us with further information about your identity as a user. However, Facebook stores and processes the data in such a way that linking to a specific user profile is possible. Facebook can use the data for its advertising purposes, following Facebook's privacy policy.

### **Third-Party Cookies**

In the case that third-party software solutions use cookies, this is mentioned in this privacy statement.

### **Changes to the Privacy Statement**

We reserve the right to change our privacy statement at all times. However, you will always find the most recent version on this page. If the new privacy statement has consequences for the way we process data already collected about you, we will notify you by email.