

## PRIVACY POLICY KRAAMZORG VDA

At Kraamzorg VDA, your personal data is collected and stored in your electronic client file. This is necessary in order for us to provide you with care and/or support services. Your personal data is processed in accordance with the Algemene Verordening Gegevensbescherming (AVG, General Data Protection Regulation – GDPR) and other applicable Dutch legislation and regulations, such as the Medical Treatment Agreement Act (WGBO), the Health Insurance Act (Zvw), and/or the Social Support Act (Wmo).

We consider it essential to handle your personal data with care. This Privacy Policy explains how we process your personal data.

### Contact details

If you have questions about this Privacy Policy or how we handle your personal data, you can contact us using the details below:

**Telephone:** 088 - 11 67 900  
 Available 24/7. For questions specifically about this Privacy Policy: Monday to Friday, 8:30 a.m. - 5:00 p.m.

**Email:** [kraam@kraamvda.nl](mailto:kraam@kraamvda.nl)

**Website:** contact form via <https://kraamvda.nl/en/information/our-district/>

**Post:** Antwoordnummer 13072, 5600 VE Eindhoven

### Article 1. Definitions

- a.** *AVG:* Algemene Verordening Gegevensbescherming (General Data Protection Regulation – GDPR), Regulation (EU) 2016/679 of the European Parliament, as applied in the Netherlands.
- b.** *Personal data:* Any information relating to an identified or identifiable natural person, within the meaning of the AVG.
- c.** *Processing of personal data:* Any operation or set of operations relating to personal data, whether or not performed by automated means, such as collecting, recording, organizing, structuring, storing, updating or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destroying data.
- d.** *Data subject:* The individual whose personal data is being processed.
- e.** *Controller:* A natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- f.** *Processor:* A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

### Article 2. Scope

This Privacy Policy applies within Kraamzorg VDA and covers all processing of personal data of clients, their legal representatives, and other contacts of Kraamzorg VDA.

### Article 3. Purpose

- 1.** Personal data is collected only insofar as necessary to ensure responsible care and/or support.
- 2.** Kraamzorg VDA may process personal data in order to:
  - a.** handle the client's request for care and/or support;
  - b.** enter into and perform agreements with the client;
  - c.** settle financial transactions relating to the care provided;
  - d.** maintain and evaluate the client relationship;
  - e.** carry out statistical, research, and communication activities, such as newsletters.
- 3.** Anonymous data may be used for policy, organisational, or statutory purposes of Kraamzorg VDA.

4. Personal data is processed fairly and carefully in accordance with this Privacy Policy and will not be used for purposes incompatible with the original purpose. Should we wish to use your data for other purposes, we will only do so with your prior consent.

#### **Article 4. Categories of data processed**

To provide appropriate care and/or support, Kraamzorg VDA may need to process the following categories of personal data: name, gender, date of birth, address, place of residence, citizen service number (BSN), telephone number, email address, bank account number, nationality, medication, relevant medical details, information regarding the indication or support request, relevant financial details, information on the health insurer/care institution/care office, and technical data such as IP addresses or cookie identifiers relating to website use. Consent for the use of website-related data is requested separately.

#### **Article 5. Legal basis for processing**

1. Personal data may be processed only if:
  - a. you have given explicit consent. For health data, express consent is required unless there is a statutory obligation to process such data;
  - b. processing is necessary for the performance of a contract to which you are a party, or in order to take pre-contractual steps at your request;
  - c. processing is necessary for compliance with a legal obligation to which Kraamzorg VDA is subject;
  - d. processing is necessary for the legitimate interests of Kraamzorg VDA or a third party, provided that your rights and freedoms, particularly your right to privacy, do not override those interests.

#### **Article 6. Information for data subjects**

1. Kraamzorg VDA informs clients through the care agreement, general terms and conditions, and intake process about the way personal data is handled.
2. Where data is collected directly from you, Kraamzorg VDA will inform you beforehand of its identity and the purposes of processing, unless you are already aware of these.
3. Where data is collected from other sources, Kraamzorg VDA will inform you at the time of collection—or at the time of first disclosure if data is collected solely for transfer to a third party—about its identity, the nature of the data, and the purpose of processing.
4. The above does not apply if providing this information is impossible or would involve disproportionate effort. In such cases, Kraamzorg VDA will record the source of the data.
5. The above also does not apply where collection or disclosure is required by law.

#### **Article 7. Disclosure of data**

1. Personal data are disclosed only to employees of Kraamzorg VDA if and insofar as this is necessary for the performance of their duties and consistent with the purposes described in Article 3.
2. Healthcare providers may share medical information with other providers directly involved in your care, but only where necessary for their work. Consent is not required, but you may object. If you object, the provider may not share your information. Medical confidentiality applies: providers are bound by professional secrecy, and institutions have a duty of care to safeguard your data. Some other professionals, such as social workers or occupational therapists, are also bound by confidentiality. Confidentiality clauses are included in staff contracts. If a new category of healthcare provider is added to the electronic client file, clients will be informed and may adjust or withdraw consent.
3. Personal data may be disclosed to third parties only where required by law and/or where necessary for the purposes of registration. In such cases, a data processing agreement will be concluded, specifying how personal data must be handled.
4. Where disclosure is not required under paragraphs 2 and 3, your consent is needed before data may be provided to third parties.

## Article 8. Retention

Kraamzorg VDA does not retain your personal data longer than necessary for the purposes of processing, unless a longer statutory retention period applies. Medical records are retained in accordance with legal requirements or for as long as reasonably necessary to ensure proper care and performance of the client agreement. When the retention period has expired, or if you submit a legitimate request for deletion before that time, the relevant data will be deleted within three months.

## Article 9. Security

1. Kraamzorg VDA takes appropriate technical and organisational measures to protect personal data against loss and against any form of unlawful processing. These measures ensure, taking into account the state of the art and the costs of implementation, a level of security appropriate to the risks and the nature of the data. Measures are also aimed at preventing unnecessary collection and further processing.
2. Examples of security measures include:
  - a. no more data is collected than strictly necessary;
  - b. electronic personal data is accessible only with a personal password combined with two-factor authentication;
  - c. employees are bound by confidentiality obligations regarding personal data;
  - d. Kraamzorg VDA uses Zorgmail, a secure email environment.
3. Kraamzorg VDA complies with the obligation to report data breaches as set out in applicable regulatory guidance. An internal procedure is in place for handling (potential) data breaches.
4. The Kraamzorg VDA website may contain links to external websites. Kraamzorg VDA is not responsible for the processing of personal data on those websites.
5. We respect your privacy and ask you to respect that of our employees, for example when using cameras or posting images on social media. Please discuss this with the employee concerned and request permission before using or publishing such images. For further details, please see our general terms and conditions.

## Article 10. Data Protection Officer

Kraamzorg VDA has appointed a Data Protection Officer (DPO) who is involved in all privacy-related matters within the organisation.

## Article 11. Right of access

1. You have the right to access and obtain a copy of the personal data processed by Kraamzorg VDA. You also have the right to view the log of your electronic file (showing who has accessed or amended data). Requests for access must be submitted in writing to Kraamzorg VDA using the contact details provided at the start of this policy.
2. Kraamzorg VDA will inform you within four weeks whether your request can be granted, in whole or in part. If your request is denied, the reasons will be explained. Grounds for refusal may include the protection of other clients or the rights and freedoms of others.

## Article 12. Right to rectification, erasure, and restriction

1. You have the right to request rectification, supplementation, erasure, or restriction of processing where your personal data is factually inaccurate, incomplete, irrelevant to the purpose, or processed unlawfully. Your written request must specify the changes you seek.
2. Kraamzorg VDA will inform you within four weeks whether your request can be granted, in whole or in part. If denied, the reasons will be explained. Grounds for refusal may include the protection of other clients or the rights and freedoms of others.
3. Where data have been rectified, supplemented, erased, or restricted, Kraamzorg VDA will notify third parties to whom the data were disclosed, unless this is impossible or requires disproportionate effort.

**Article 13. Questions**

If you have any questions regarding privacy, you may contact us by telephone at **088 - 11 67 900**, by email at [kraam@kraamvda.nl](mailto:kraam@kraamvda.nl), or in person at the Kraamzorg VDA office. We will respond as soon as possible.

**Article 14. Complaints**

If you believe that your personal data has been processed improperly or unlawfully, and your concerns have not been adequately addressed by us, you may lodge a complaint with our complaints committee in accordance with our complaints procedure. This procedure is published on our website. We will discuss your complaint with you and seek to reach a solution together.

**Article 15. Amendments**

Kraamzorg VDA reserves the right to amend this Privacy Policy. We recommend that you consult it regularly to stay informed of any changes.

*This Privacy Policy reflects Dutch law and regulations (AVG, WGBO, Zvw, Wmo) and must be interpreted in accordance with them.*