

## Privacy policy

We respect your privacy. Our organization is committed to preserve your privacy as much as possible. Confidentiality is observed with regard to any information you provide to us. When processing personal data, we observe the applicable laws and regulations in privacy. This privacy policy informs you about the way in which we handle your data.

### Scope of application

This privacy policy applies to AHG Holding B.V. and its operating companies:

- Active Health Group B.V.
- Active IT Lab B.V.
- Atrium Adviesgroep B.V.

### Categories of personal data

When you make use of our services certain (personal) data may be collected as follows:

- Absenteeism supervision:
  - Name/Address/City
  - Contact details
  - Sex
  - Health data
  - SFB status (structurally functionally limited)
  - Employment contract and salary details
- Organizational advice/DZI Consultancy/IGM
  - Name/Address/City
  - Contact details
- Medical examinations:
  - Name/Address/City
  - Contact details
  - Sex
  - Health data
- Preventive Medical Examination (PMO)/PAGO (Periodical Occupational Health Test):
  - Name/Address/City
  - Contact details
  - Sex
  - Health data

- Preventive Medical Examination 2.0 (PMO 2.0):
  - Name/Address/City
  - Contact details
  - Sex
  - Health data
- Employability/resilience/lifestyle coaching:
  - Name/Address/City
  - Contact details
  - Sex
  - Health data
- Re-integration coaching:
  - Name/Address/City
  - Contact details
  - Sex
  - Health data
- Career coaching/outplacement:
  - Name/Address/City
  - Contact details
  - Sex
  - Curriculum Vitae
  - Progress file
- Courses/training/education:
  - Name/Address/City
  - Name of organization
  - Contact details
  - Date of birth
  - BIG number (professions in individual health care)
- Complaint handling
  - Name/Address/City
  - Contact details
  - Health data
- Financial administration:
  - Name/Address/City
  - Contact details
  - Financial data
- Marketing & Communication:
  - Contact details
- Sales:
  - Name/Address/City
  - Name of organization
  - Contact details

- Job application:
  - Name/Address/City
  - Contact details
  - Curriculum Vitae
  - Photo
- Visiting a branch:
  - Name
  - Date of visit
  - Arrival time
  - Departure time

### **Basis for data processing**

We may only process personal data on a so-called legal basis. Our services usually involve the performance of legal obligations and/or the provision of healthcare. These principles can be found in Articles 6 paragraph 1 sub c and 9 paragraph 2 sub h of the General Data Processing Regulations (GDPR).

We could also have an agreement with you for our services; in that case, the performance of this agreement is the legal basis according to article 6 paragraph 1 sub b GDPR.

If we wish to process your data for marketing & communication purposes, we ask for your consent; we will do so in accordance with Article 6 paragraph 1 sub a GDPR. A justified interest in marketing & communication purposes provides another basis; in that case article 6 clause 1 subsection f GTC applies. For anonymised information processing using Google Analytics as specified in these privacy regulations for 'Cookies', article 6 paragraph 1 under f of the GDPR applies.

In the event of processing your data for sales purposes, the legal basis is article 6 clause 1 subsection f GDPR.

For the processing of your application data, we first ask you for permission; you will find this basis in article 6 paragraph 1 sub a GDPR.

Without your data we are unable to execute our services or inform you about our services. Unfortunately, if you would like us to destroy your data, this usually means we'll have to stop our services and communication with you.

### **Sources**

We receive your personal data from you, your employer and third parties with whom we cooperate such as the UWV (Employees Insurance Agency).

### **Purposes of data processing**

Personal data collected by us will be used for the following purposes:

- Performance of our services such as absenteeism supervision, examinations, preventive medical examination, coaching, and courses including possible complaint management.
- Providing information about our activities, and
- Carrying out the application procedure, and
- Accounting and financial settlement.

## Access to personal data

Within our organization, we apply the following principles regarding access to personal data:

- Only Active Health Group employees have access to personal data to the extent necessary for the proper performance of their duties.
- Authorisations for information systems shall be granted only to officials in job groups to whom access is necessary pursuant to the performance of their duties. An authorisation matrix specifies the authorisations up to the level of the type of rights: none, reading, editing.
- In the case of special personal data, access is subject to the condition that work is performed under the task delegation of the relevant company doctor.
- Third parties hired or otherwise appointed by Active Health Group to perform work have access to personal data to the extent necessary for the proper performance of their duties and are contractually bound to secrecy.
- Electronic (medical) personal data shall be secured in such a way that unauthorised persons cannot gain access to these data.
- An outline is shown below of which access has been provided to which data from which job (group) for each data category.

Absenteeism supervision	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
(administrative)-Case manager	T	Conditionality of task delegation by Company doctor
Physician in training/general practitioners	T	Conditionality of task delegation by Company doctor
Company doctors	T	T
Support (Company) doctors	T	Conditionality of task delegation by Company doctor
Ergonomist	T	-
Core experts: higher safety expert, occupational hygienist, occupational & organization expert	T	-
Absenteeism professionals other	T	Conditionality of task delegation by Company doctor
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	Conditionality of task delegation by Company doctor
Customer Team Manager	T	Conditionality of task delegation by Company doctor
Management	-	-

Organization advice/DZI Consultancy/IGM	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Company doctors	T	T
Company doctors in training/general practitioners	T	Conditionality of task delegation by Company doctor
Core experts: higher safety expert, occupational	T	-

hygienist, occupational & organization expert		
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	T	-
Employee Security/Manager Security	T	-
Management	T	-
Management	T	-

Medical examinations	Standard data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Examination staff	T	Conditionality of task delegation by Company doctor
(Examination) doctors	T	Conditionality of task delegation by Company doctor
Core experts: higher safety expert, occupational hygienist, occupational & organization expert	T	-
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	Conditionality of task delegation by Company doctor
Manager Inspections	T	Conditionality of task delegation by Company doctor
Management	-	-

Preventive Medical Examination (PMO)/PAGO	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee PMO/PAGO	T	Conditionality of task delegation by Company doctor
Lifestyle experts/Coaches	T	-
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	Conditionality of task delegation by Company doctor
Manager PMO/PAGO	T	Conditionality of task delegation by Company doctor
Management	-	-

Preventive Medical Examination 2.0 (PMO 2.0)	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee PMO	T	Conditionality of task delegation by Company doctor
Lifestyle experts/Coaches	T	-
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	Conditionality of task delegation by Company doctor
Manager PMO	T	Conditionality of task delegation by Company doctor

Management	-	-
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Employability/resilience/ lifestyle coaching	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Backoffice AHC	T	-
Coaches	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Backoffice AHC	T	-
Management	-	-

Reintegration coaching	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Backoffice AHC	T	-
Coaches	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Backoffice AHC	T	-
Management	-	-

Career coaching/outplacement	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Backoffice AHC	T	-
Coaches	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Backoffice AHC	T	-
Management	-	-

Courses/training/education	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Backoffice AHC	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Education Manager	T	-
Management	-	-

Complaint handling	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Complaint handler	T	Conditionality of task delegation by Company doctor
Functional application manager	T	Conditionality of task delegation by Company doctor
Quality Employee/Quality Manager	T	-

Employee Security/Manager Security	T	-
Management	T	-

Financial administration	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Finance	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Finance	T	-
Management	T	-

Marketing & Communication	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Marketing & Communication Assistant	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Marketing & Communication	T	-
Management	-	-

Sales	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Sales	T	-
Account manager	T	-
Consultant	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Sales Manager	T	-
Management	T	-

Application	Standard personal data (name, photo and contact details)	Supplementary privacy sensitive personal data (health data)
Employee Recruitment & Selection	T	-
Functional application manager	T	-
Quality Employee/Quality Manager	-	-
Employee Security/Manager Security	T	-
Manager Recruitment & Selection	T	-
Management	T	-

Visiting a location	Standard personal data (name and contact details)	Supplementary privacy sensitive personal data (health data)
Hostess	T	-

Functional application manager	T	-
Support (company) doctors	T	-
Quality Employee/Quality Manager	T	-
Employee Security/Manager Security	T	-
Employee General Affairs	T	-
Management	T	-
Management	T	-

### Provision of your personal data to third parties

Personal data shall only be provided to a third party when required by a statutory requirement or with the consent of the registered person or his authorised representative, or if the data processing is necessary to protect the legitimate interests of the third party to whom the data is provided.

A client's medical information is only provided to the employer or third parties with the client's specific written consent. This consent shall be included in the medical file.

No notice shall be given to the employer of an employee's visit to a working-conditions consultation or voluntary participation by an employee in periodic examinations. If, as a result of such a visit or participation, the company doctor wishes to give advice to the employer, the express and specific consent of the employee is required. This consent must be confirmed through a written authorisation. Such written consent shall be recorded in the medical file.

### Retention periods

We will not retain your data for longer than is necessary for the purposes described above, unless required by law, which provision will be observed by us.

The Wet geneeskundige behandelingsovereenkomst (WGBO) (Medical Treatment Agreement Act) prescribes a statutory retention period for medical records of 15 years or as much longer as ensues from the care of a proper and professional care provider. In a situation where there is no treatment agreement, the medical file may be kept as long as this is necessary for the purpose of the examination.

Medical records created for the purpose of monitoring and absenteeism supervision are kept for up to 15 years from the last addition or modification. Occupational illnesses may manifest themselves after an even longer period of time. When this risk is a possibility, medical records should be kept for a longer period of time for this purpose.

The Working Conditions Decree stipulates that the results of an occupational health examination of employees exposed to certain hazardous substances must be kept for at least 40 years after the end of their exposure. The Radiation Hygiene Decree stipulates that records of employees who have been exposed to ionising radiation must be kept until the employee has reached, or would have reached, the age of 75 years, and at least for 30 years after the person has terminated the practices.

There is no legal retention period for the retention of administrative, non-medical absence data. In principle, we do not reasonably store these for longer than 2 years after completion of the supervision/procedure. If the employer bears a deductible excess for the Sickness Benefits Act, a statutory retention period of 5 years applies. If the employer bears the excess of the WGA (work



resumption for partially disabled persons), a retention period applies for the duration of the WGA process: 10 years.

There is no legal retention period for the administrative, non-medical part of a reintegration file. In principle, we do not reasonably retain these longer than 2 years after completion of the reintegration process.

Pursuant to the Medical Examinations Act (Wmk) and the WGBO (medical treatment agreement Act), medical examination and Preventive Medical Examination (PMO) data are kept as long as this is necessary for the purpose for which the examination was carried out. A maximum retention period of 6 months applies to the applicant's employment records, regardless of whether the applicant is hired or not.

There is no legal retention period for administrative, non-medical inspection/PMO data. In principle, we do not reasonably retain these for longer than 2 years after completion of the examination/the process. Exceptions are professional examinations to which a declaration of suitability for carrying out work is linked; in principle, we do not reasonably store these for longer than 5 years after completion of the examination.

For the retention of complaints, we apply a term of 10 years in line with the term of the right of complaint of the Health Care Disciplinary Board.

The standard retention period for application data is 4 weeks after the end of the application procedure. If you agree to keep the data for a longer period, it will be kept for a maximum of 1 year after the end of the application procedure.

Further to this, if we have an agreement with you, we will keep your data as long as required by law; normally this is 7 years. If we do not have a contract with you, we will retain your contact details as long as we have a legitimate interest in doing so and you have not objected to this.

## Cookies

On our websites [www.activehealthgroup.nl](http://www.activehealthgroup.nl), [www.activehealth.nl](http://www.activehealth.nl), and [www.activehealthassurance.nl](http://www.activehealthassurance.nl) general visiting data are tracked via Google Analytics. We may use these data anonymously for statistical analysis and optimisation of the functioning of the website. This includes the following categories of data: IP address without last octet; time, country, place, language of query; browser used, operating system, service provider, screen resolution; number of visitors, sessions, bounce rates; page views, values, bounce rate, exit rate; average session duration; channel of visit. We have disabled Google's "data sharing with Google" features and do not use other Google services in conjunction with Google Analytics cookies.

Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

You can set your browser to notify you when you receive a cookie or to allow or deny cookies in general.

## Your rights

When we process personal data about you, you have various rights which you can exercise. For example, you have the right to access, rectify and delete your data. You can also request us to transfer data to you or another party or to limit the data processing. You are also free to object to the processing of your data. You can submit your request to us in writing by e-mail via [melding@activehealthgroup.nl](mailto:melding@activehealthgroup.nl) or by post. You will find our contact details on the last page of these privacy regulations. We aim to respond to your request within 14 working days.

## Filing a complaint

In the unlikely event you might not be satisfied with our way of handling your personal data, your complaint can be submitted. With respect to this, we refer you to our complaints regulations on our website. You also have the option of submitting a complaint to the Personal Data Authority. Contact details of the Authority Personal Data can be found here: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>.

## Amendments to this privacy policy

We reserve the right to amend this privacy policy. All changes will be announced on our website. We therefore advise you to consult our website regularly so that you are aware of any changes.

The original privacy document is written in Dutch and has been translated into English. While it is intended that both versions are identical, the possibility of any discrepancies between the Dutch version and English version might appear. In any case the Dutch version of the privacy policy will dominate.

## Automated decision-making

We do not use your personal data to make automatic decisions about your treatment in any way. Consequently, no automated decision-making as referred to in article 22 of the GDPR takes place.

## Our contact details

The formal controller is:  
Active Health Group  
Folkert Elsingastraat 38  
3067 NW Rotterdam

For all your questions and comments about privacy and the protection of your personal data in our organization, please contact our Data Protection Officer:

Data Protection Officer  
Active Health Group  
Folkert Elsingastraat 38  
3067 NW Rotterdam  
T: +31-88-2866055  
E: [melding@activehealthgroup.nl](mailto:melding@activehealthgroup.nl)

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