



 **Werkse!**

Privacy policy

March 20, 2024

Version 2

Privacy policy

In this policy Werkse! shows how it handles personal data and privacy, and what is and is not legally responsible. Werkse! processes personal data so that it can perform its statutory tasks. This policy applies to all processing of personal data that takes place within Werkse!

Legislation

Each European Union member state had its own privacy law, based on the 1995 European directive. The Personal Data Protection Act (Wbp) regulated the legal framework for handling personal data in the Netherlands. From 25 May 2018, the Wbp expired and the European Regulation; the General Data Protection Regulation (AVG), applies, along with its implementing law (UAVG). The AVG builds on the Wbp and, among other things, strengthens and expands individuals' privacy rights with more responsibilities and obligations for organisations.

Protection of your personal data

Werkse! handles your personal data carefully, securely, proportionately and confidentially. This means that:

- Werkse! only processes your personal data based on a lawful ground stroke as defined in the General Data Protection Regulation (AVG). The processing of personal data takes place on the basis of a legal obligation, public interest, legitimate interest, consent or agreement.
- Within Werkse! a separate data protection officer (FG) supervises the protection of your personal data. The FG is involved in all situations that deal with the protection of personal data. For questions about privacy or dealing with personal data, you can contact the FG of Werkse! via privacy@werkse.nl.
- Employees of Werkse! who process personal data are periodically trained and are informed on how to handle personal data.

The Personal Data Authority is the national supervisory authority for the protection of your personal data. Visit the website of the Personal Data Authority for more information.

Use of your personal data by Werkse!

Werkse! processes personal data of employees, people who are helped by Werkse! to and with work or with participation, mostly people with social assistance benefits (clients) and business relations.

- Personal data of employees are used to comply with specific statutory obligations.
- Personal data of clients are used for guidance and mediation towards a regular employer. Only relevant personal data are processed for this purpose.
- Personal data of business relations are used for commercial purposes or for mediation to employment of clients. Personal data such as organisation, name, telephone number and e-mail address are processed for this purpose.
- Special personal data are only processed on the basis of a legal obligation or when necessary for security reasons.

Obligations and responsibilities of Werkse!

- Werkse! handles your personal data carefully and confidentially.
- Werkse! ensures that the personal data are correct and complete before they are processed. Werkse! does not process more personal data than is strictly necessary for the purpose. Werkse! does not retain the personal data longer than necessary for the performance of its duties or statutory obligation.
- Werkse! will inform you about how it handles your personal data, what the processing is for, to whom the data is provided and how long the data is retained.
- Werkse! will only collect your personal data if the purpose cannot be achieved in any other way.
- Werkse! will only process your personal data if this is proportionate to the purpose. If no, or less (burdensome) personal data is used to achieve the same purpose, this will always be chosen.
- Werkse! protects your personal data as well as possible against unauthorised access or unlawful use.
- Werkse! takes the necessary security measures and uses security procedures to protect your personal data. There are technical security measures such as encryption of personal data and access controls to computer systems. How Werkse! does this is set out in Werkse!'s information security policy. Data is only processed by persons with a duty of confidentiality. And only authorised employees are given access to personal data.
- Werkse! is responsible for keeping a register of all processing operations for which Werkse! is the data controller. Each register contains a description of what takes place during a processing operation, and what data are used for that purpose.
- Werkse! prepares a data protection impact assessment, or Data Protection Impact Assessment, when the processing meets at least 2 of the set criteria drawn up by the European privacy supervisory authorities or if this is desirable. By deploying this tool, Werkse! can take measures to reduce privacy risks.

Data breaches

We speak of a data leak when personal data falls into the hands of third parties who should not have access to that data. Werkse! will then take measures to plug the leak as quickly as possible. If there is a major breach of personal data protection that could cause you damage, we will contact you and report the data leak to the Personal Data Authority. To prevent future data breaches, existing data breaches are recorded and evaluated.

Retention period

Werkse! does not retain your personal data for longer than is necessary for the proper performance of its duties and for compliance with its legal obligations.

Provision of personal data to other organisations

Werkse! is responsible for processing the personal data you have provided to Werkse!.

- We conclude a processing agreement with organisations that process your data on behalf of Werkse!. Werkse! remains responsible for processing your personal data.
- Sometimes Werkse! cooperates with other (government) bodies in the implementation of statutory regulations.
- Werkse! sometimes has to share personal data with other government and other organisations.
- Werkse! does not transfer personal data to a country outside the European Economic Area (EEA) or an international organisation.

Your rights

You have a number of rights when Werkse! uses your personal data. These rights are also referred to as data subjects' rights and consist of the following rights:

- **Right to information.** You have the right to know why your personal data are needed, what Werkse! does with it and how long the data are retained.
- **Right to inspection.** You have the right to see whether and how Werkse! processes your data. **Right to rectification.** Is it clear that your data is incorrect? If so, you have the right to supplement or correct your personal data.
- **Right to be forgotten.** You have the right to have Werkse! delete your personal data. However, this is not always possible.
- **Right to restrict processing.** You have the right to ask Werkse! to (temporarily) stop processing your personal data. However, this is not always possible.
- **Right to transfer your data.** You have the right to request all your personal data from the person responsible for processing and to transfer them in their entirety to another controller.
- **Right to object.** You can object to the processing of your data by Werkse! Werkse! will comply with this unless there are legitimate grounds for the processing.

Submitting request

To exercise your rights, you can submit a request. This request can be made either in writing (by post) or by e-mail. In some cases, the request must be requested from the Municipality of Delft (inspection of your personal data).

Werkse! has four weeks from receipt of the request to assess whether the request is justified. Within four weeks Werkse! will let you know what will happen with the request. If the request is not followed up, there is the option of submitting a complaint to Werkse! or to the Personal Data Authority (AP). On the basis of a request, Werkse! may request additional information to be sure of the identity of the data subject.

Automated processing/decision-making

The privacy legislation AVG gives individuals the right to a human eye in automatic decisions that affect them.

- **Profiling.** Werkse! does not use profiling. This means that no automated decision is made about someone based on that person's profile.
- **Application of algorithms.** Werkse! may make use of big data research involving the use of algorithms. Data is only collected for research carried out by or after human Werkse! In this process, the data are not traceable to a natural person. Nor are decisions made on the basis of automated processing. Werkse! will always apply human intervention.
- **Tracking.** Werkse! does not make use of tracking. This means that Werkse! does not track mobile phone use over a wifi connection or surfing behaviour on the internet.
- **Deployment of cameras.** Werkse! uses a number of cameras in its buildings and on its premises. Werkse! has signs hanging in the camera area. Werkse! does not use camera surveillance in the workplace itself. More about camera surveillance within Werkse! can be read in the Werkse! camera protocol.

Establishment of privacy policy

Establishment of privacy policy

Within Werkse! we work a lot with personal data of employees and clients. Personal data is mainly collected for the proper performance of statutory tasks. Employees and clients must be able to rely on Werkse! handling the personal data carefully and securely. In these times, Werkse! also goes along with new developments. New technological developments, innovative facilities, globalisation and an increasingly digital government make other demands on data protection and privacy. Werkse! is aware of this and ensures that privacy is safeguarded, among other things through measures in the field of information security, data minimisation, transparency and user control.

With this policy, Werkse! provides clear direction on privacy and demonstrates that it safeguards, protects and enforces privacy. This policy applies to the entire organisation, all processes, components, objects and data collections of Werkse! This privacy policy of Werkse! is in line with the general policy of the municipality of Delft and the relevant, national and European laws and regulations.

Legal frameworks for data handling

Werkse! is responsible for drafting, implementing and enforcing the policy. Legal frameworks for this include the following:

- European Regulation; the General Data Protection Regulation (AVG)
- Implementation Act for the General Data Protection Regulation

Werkse! is part of the municipality of Delft. For Werkse! and Werkse! Holding BV, we broadly follow the privacy policy of the municipality of Delft. This privacy policy of Werkse! is therefore a derivative of the policy of the municipality of Delft.

Basic principles

Werkse! handles personal data securely and respects the privacy of those involved. Werkse! adheres to the following principles in this respect:

Lawfulness, propriety, transparency

Personal data are processed in accordance with the law and in a proper and careful manner.

Basis and purpose limitation

Werkse! ensures that personal data are collected and processed only for specified, explicit and legitimate purposes. Personal data are only processed with a justifiable basis.

Data minimisation

Werkse! only processes the personal data that are minimally necessary for the predetermined purpose. Werkse! aims for minimal data processing. Where possible, less or no personal data are processed.

Retention period

Personal data are not kept longer than necessary. Retaining personal data may be necessary so that Werkse! can properly perform its tasks or to comply with statutory obligations.

Integrity and confidentiality

Werkse! handles personal data carefully and treats them confidentially. For example, personal data are only processed by persons with a duty of confidentiality and for the purpose for which they were collected. In addition, Werkse! ensures appropriate security of personal data. This security is laid down in the information security policy.

Sharing with third parties

In the event of collaboration with external parties, which involves the processing of personal data, Werkse! makes agreements on the requirements that data sharing must meet. These agreements comply with the law.

Subsidiarity

To achieve the purpose for which the personal data are processed, infringement of the privacy of the data subject is limited as much as possible.

Proportionality

The infringement of the interests of the data subject may not be disproportionate in relation to and purpose to be served by the processing.

Rights of data subjects

Werkse! recognises all rights of data subjects.

This version of the privacy policy is a continuation of the 25 May 2018 version and comes into force 20 March 2024. The policy is evaluated every year and revised if necessary. Adjustments to this policy will be announced via Werkse! intranet.

Thus adopted on 20 March 2024,

Cor van der Wel
Directeur