

Privacy Regulations De Kleine Wereld

1. Definitions

Personal data	Any information concerning an identified or identifiable natural person.
Processing personal data	Any action or set of actions relating to personal data, including at least the collecting, recording, organizing, storing, updating, modifying, retrieving, consulting, using, providing by means of forwarding, distribution or any other form of posting, bringing together, relating to one another, as well as the protection, erasure or destruction of data.
Exceptional personal data	A personal data point that says something about someone's religion, philosophy of life, race, political opinion or his or her health.
Person concerned	The person to whom a personal data point relates, whether or not represented by his legal representative. In these regulations this concern parents and children.
Legal representative	If the person concerned has not yet reached the age of sixteen years, the person concerned will be represented by his or her legal representative. Usually this will be a parent but it can also be a guardian.
Responsible person	The responsible person determines which personal data is being processed and what the purpose of that processing is.
Processor	The person who processes personal data on behalf of the responsible person, without being subject to his direct authority; The company, institution or supplier that processes personal data on behalf of De Kleine Wereld.
Third party	Any person other than the Person concerned, the Responsible person, the Processor, or any person who is under the direct authority of the Responsible person or the Processor authorized to process personal data.
Day-care	Day-care center for children of 0-4 and 4-13 years of age.

2. Scope and objective

1. These regulations set out rules regarding the processing of personal data of customers (parents and children) of De Kleine Wereld.
2. These regulations apply to all personal data regarding the person concerned that are processed by De Kleine Wereld (The Small World). This regulation is intended to:
 - a. protect the personal privacy of the persons concerned against the wrong and unintentional use of the personal data;
 - b. determine which personal data are processed and for what purpose this is done;
 - c. ensure the careful processing of personal data;
 - d. warrant the rights of the persons concerned.

3. Objectives of the processing of personal data

In the processing of personal data, De Kleine Wereld complies with the relevant legislation, including the General Data Protection Regulation (AVG). The processing of personal data takes place with the objective of:

- a. providing care and performing the related administration and invoicing;
- b. linking the provided childcare hours to the childcare allowance by the Tax Service;
- c. handling disputes and having auditing executed by the accountant;
- d. implementing or applying any other law.

4. Purpose binding

Personal data will only be used to the extent that such use is compatible with the specified purposes of the processing. De Kleine Wereld does not process more data than is necessary to achieve those established goals.

5. Types of personal data

The categories of personal data used by De Kleine Wereld are listed in Appendix 1.

1. Legal grounds for processing

Processing of personal data only takes place based on the following legal grounds:

- a. Permission: in cases where the person concerned has given his unambiguous consent to the processing.
- b. Agreement: in cases where the data processing is necessary for the execution of an agreement to which the person concerned is a party, or for the taking of pre-contractual measures in response to a request from the person concerned and which are necessary for concluding an agreement.
- c. Legal obligation: in cases where the data processing is necessary to comply with a legal obligation to which De Kleine Wereld is subject.
- d. A vital interest.
- e. Statutory task: in the event that the data processing is necessary for the proper performance of a statutory task by the relevant administrative body or the administrative body to which the data are provided.
- f. Legitimate interest.

2. Retention periods

De Kleine Wereld will not store the data any longer than is necessary for the fulfilment of the purpose for which they were obtained, unless there is another legal obligation that makes it mandatory to retain the data for a longer period of time. See Appendix 2 for an overview of the retention periods.

3. Access

De Kleine Wereld will only grant access to the personal data entered in the records and systems of Kleine Wereld to:

- a. employees who are entitled to access because of their position at the De Kleine Wereld (The Small World);
- b. the Processor authorized to process personal data;
- c. third parties that must be granted access by virtue of the law, whereby access is only granted to the data to which access must be granted by law.

4. Security and confidentiality

- a. De Kleine Wereld takes appropriate technical and organizational security measures to prevent the personal data from being damaged, lost or unlawfully processed. The measures are also aimed at preventing unnecessary collection and further processing of personal data.
- b. De Kleine Wereld ensures that employees have no further insight in, or access to the personal data than that which is strictly necessary for the proper performance of their work.
- c. The security measures take into account the current state of technical development and the costs of implementation. In addition, De Kleine Wereld takes into account the actual risks that may apply to the processed personal data.
- d. Anyone who is involved in the implementation of these regulations, and as a result of that, gains access to personal data that are confidential or must be kept secret (such as, for example, healthcare data), and for whom a duty of confidentiality does not already apply by virtue of an occupation, position or statutory provision, is obliged to maintain the confidentiality of these personal data.

5. Providing data to third parties

When there is a legal obligation to do so, De Kleine Wereld can provide the personal data to third parties. The provision of personal data to third parties can also take place after permission from the person concerned has been obtained.

6. Social media

For the use of personal data in social media, separate agreements have been made in the 'code of conduct' of De Kleine Wereld (The Small World).

7. Rights of the persons concerned

The AVG gives the person concerned a number of rights. De Kleine Wereld recognizes these rights and acts in accordance with these rights.

Access and transfer	Every person concerned has the right to inspect and transfer the personal data processed by De Kleine Wereld that relate to him / her. De Kleine Wereld may attach a cost price of a maximum of € 5 to comply with this request. If the request is rejected, no costs will be charged. The Small World may ask for a valid proof of identity to verify the identity of the applicant.
Correction, supplementation, removal and shielding	The person concerned can make a request for the correction, addition, removal or protection of his personal data, unless this proves impossible or would require an unreasonable effort.
Protest	Insofar as De Kleine Wereld uses personal data on the basis of Article 6 (e) and (f), the person concerned may oppose the processing of personal data on the basis of his personal circumstances.
Response period	De Kleine Wereld must respond favourably in writing within a period of 4 weeks after the receipt of a request or must reject it in writing, with a motivation. De Kleine Wereld may inform the person concerned that more time is needed and extend the above period by a maximum of 4 weeks.
Implementing the request	If the request of the person concerned is honoured, De Kleine Wereld will ensure that the requested changes are implemented as soon as possible.
Withdrawal of permission	Insofar as prior permission is required for the processing of personal data, this permission may be revoked at any time by the legal representative.

8. Transparency

- a. De Kleine Wereld informs the person concerned about the processing of his / her personal data. If the type of processing requires this, De Kleine Wereld will inform each person concerned about the details of that processing separately.
- b. De Kleine Wereld will inform the person concerned - in general terms - about the agreements made with third parties and processors who receive personal information about the person concerned, as well.

9. Complaints

- a. If you are of the opinion that the actions or inactions of De Kleine World are not in accordance with the AVG or as it is elaborated in these regulations, then you should turn to the management of De Kleine Wereld (The Small World).
- b. In accordance with the AVG, the person concerned may also turn to the judge or to the Dutch Data Protection Authority.

10. Unforeseen situations

If a situation arises which is not described in these regulations, the responsible person will take the necessary measures.

11. Alterations to the regulations

These (draft) regulations are established by the responsible person after consultation with the Central Committee of Parents. The responsible person will make these regulations public via the internet. The responsible person has the right to amend these regulations after approval by the Central Committee of Parents.

12. Final provisions

These regulations are to be referred to as "the Privacy Regulations" of De Kleine Wereld and take effect on 15 May 2018.



1. Children

No personal data of a customer will be processed other than:

- a. name, first names, initials, gender, date of birth, address, postcode, place of residence;
- b. citizens service number;
- c. nationality and place of birth;
- d. data that are necessary for the health or well-being of the child;
- e. data concerning the religion or philosophy of life of the child, insofar as these are necessary for the day care practice;
- f. data on the development of children relevant to the course of the day care practice;
- g. data related to calculating, recording and collecting the childcare allowance;
- h. data other than those included in a through i, of which the processing is required as a result of the application of a statutory regulation or of which the processing is necessary with a view to the application of a statutory regulation.

2. Parents, guardians, caretakers of children

No personal data of parents, guardians and caretakers of children are processed other than:

- a. name, first names, initials, titles, gender, date of birth, address, postal code, place of residence, telephone number and similar data intended for communication purposes;
- b. citizens service number;
- c. nationality and place of birth;
- d. relation to the child;
- e. marital status

3. Employees

No personal data of employees are processed other than:

- a. name, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number, e-mail account and similar data required for communication, as well as bank and giro account number of the person concerned;
- b. an employee number that does not contain any information other than that referred to under a;
- c. nationality and place of birth;
- d. data as referred to under a, of the parents, guardians or caretakers of underage employees;
- e. data concerning courses followed and courses to be followed, training and internships;
- f. information concerning the position or the former position, as well as the nature, content and termination of the employment;
- g. information relevant to the administration of the presence of the persons concerned at the place where the work is performed and their absence in connection with leave, reduction of working hours, childbirth or illness, with the exception of data regarding the nature of the illness;
- h. data that are recorded in the interests of the persons concerned in view of their working conditions;
- i. data, including data concerning family members and former family members of the persons concerned, which are necessary with a view to an agreed employment condition;
- j. data involving the organizing of the personnel assessment and of career counselling, insofar as these details are known to the persons concerned;
- k. data other than those included in a through j, of which the processing is required as a result of the application of a statutory regulation or of which the processing is necessary with a view to the application of a statutory regulation.

4. Job Applicants

No personal data of job applicants will be processed other than:

- a. name, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number, e-mail account and similar data required for communication, as well as bank and giro account number of the person concerned;
- b. an employee number that does not contain any information other than that referred to under a;
- c. nationality and place of birth;
- d. data concerning courses followed and courses to be followed, training and internships;
- e. information regarding the job to which was applied;
- f. information on the nature and content of the current employment and on its termination;
- g. information on the nature and content of previous employment and on its termination;
- h. other information with respect to job performance, which has been provided by the person concerned or that is known to him or her;
- i. data other than those included in a through i, of which the processing is required as a result of the application of a statutory regulation or law, or of which the processing is necessary with a view to the application of a statutory regulation or law.

Appendix 2
Registration of personal data: Administration of clients



Categories of people	Parents
Type of data and the purpose of the data processing	Name address and place of residence data, tel. numbers, e-mail addresses: for arranging a placement of child(ren)
Legal grounds	The data registration is necessary for the implementation of the placement agreement, and introduction to the waiting list registration used by De Kleine Wereld (The Small World).
The responsible person	General Management of De Kleine Wereld
The administrator	Employees department Planning & Placement Location managers kdv/bsv
The processor	None
The users	Personnel department planning & Placement / group leadership of the group where the child is placed kdv/bsv.
The persons concerned	Legal guardians of placed and waiting list children
Third parties	None
The receivers	Location management kdv / bsv and the group leadership of the group where the child is placed
Origin of data	From the legal guardians. Are delivered in writing, by telephone or by e-mail (see also application form)
Security guaranteed by	Data is stored in the child plan system. Can be viewed by staff from the Planning & Placement department. At the locations, these data are stored in a group binder, which is stored in a closed cabinet.
Information obligation	In the general conditions, which are supplied to everyone together with the contract
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld
Retention period	At the locations, the data is destroyed when the day care has been finished. The Planning & Positioning department retains the data for 7 years after the day care has ended.



Registration of personal data: Financial registration of clients

Categories of people	Parents
Type of data and the purpose of the data processing	Income data: in order to calculate the parental contribution for the care of his / her child(ren)
Legal grounds	The data registration is necessary for the implementation of the placement agreement
The responsible person	General Management of De Kleine Wereld
The administrator	Debtors administration employees of the finance department
The processor	None
The users	Debtors administration employees of the finance department
The persons concerned	Legal guardians of placed children and waiting list children
Third parties	The accountant
The receivers	The employees of the Planning & Placement department and the employees of the debtors administration
Origin of data	From legal guardians
Security guaranteed by	Only viewable by employees of Planning & Placement and the Financial department through a secure login.
Information obligation	By signing the agreement, the person concerned is aware of the fact that data is known to De Kleine Wereld
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	The income data is retained for 7 years.

Registration of personal data: Child

Categories of people	Children
Type of data and the purpose of the data processing	Name, address and place of residence data, medical data, contact data of legal guardians: in order to be able to inform the caretakers in emergency situations and to perform the right actions
Legal grounds	The data registration is necessary in accordance with the general conditions
The responsible person	General Management of De Kleine Wereld
The administrator	Location management kdv/bsv
The processor	None
The users	Group leadership and manager
The persons concerned	Legal guardian
Third parties	None
The receivers	Group leadership of the group where child is placed, (assistant) Location management kdv / bso. Emergency services such as police, fire brigade, hospital in case of emergencies where their help is called in
Origin of data	Legal guardians and in the case of placement data, the dept. Planning & placement
Security guaranteed by	The data are available via Konnect (group and parent app) via a login. A hardcopy of a part of the data is stored in closed cabinets. During working hours there is a group folder next to the telephone in which this data is stored.
Information obligation	By signing the master card, the person concerned is aware of the fact that the data are known to De Kleine Wereld.
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	All data will be deleted after termination of the day care.

Registration of personal data: Complaints

Categories of people	Parents
Type of data and the purpose of the data processing	Name, address and place of residence data, telephone numbers, e-mail addresses: for treating and possibly resolving the complaints
Legal grounds	The data registration is necessary for the execution of the complaints procedure
The responsible person	General Management De Kleine Wereld
The administrator	Manager day care
The processor	None
The users	Manager day care
The persons concerned	Legal guardians of placed children and waiting list children
Third parties	Regional complaints committee
The receivers	Managers of the department where a complaint has been filed
Origin of data	From legal guardians
Security guaranteed by	Data are stored in a digital file and in a complaints folder.
Information obligation	Parents receive written information about the complaints procedure during the intake
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	7 years after the settling of the complaint

Registration of personal data: Waiting list

Categories of people	Parents
Type of data and the purpose of the data processing	Name, address and place of residence data, telephone numbers, e-mail addresses: for arranging a placement of child(ren)
Legal grounds	The data registration is necessary for the implementation of the placement agreement
The responsible person	General Management De Kleine Wereld
The administrator	Employees of the department Planning & Placement
The processor	None
The users	Employees of the department Planning & Placement
The persons concerned	Legal guardians of placed children and waiting list children
Third parties	Mediation organizations
The receivers	The department Planning & Placement
Origin of data	From legal guardians. Are delivered in writing, by telephone or by e-mail (see also application form)
Security guaranteed by	Data are stored in the child planning system. These can be viewed by staff of the Planning & Placement department.
Information obligation	By providing data by telephone or e-mail, the person concerned is aware of the fact that data is known by De Kleine Wereld
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	Until the child reaches either 4 or 12 years of age

Registration of personal data: Child observation data

Categories of people	Children
Type of data and the purpose of the data processing	Name, date of birth and development data, with the aim of measuring the well-being of children.
Legal grounds	The data registration is necessary for measuring the well-being.
The responsible person	General Management of De Kleine Wereld
The administrator	Pedagogue
The processor	Group leadership
The users	Group leadership and Location Manager
The persons concerned	Legal guardians
Third parties	None
The receivers	None
Origin of data	Observations by the group leadership
Security guaranteed by	Digitally (in the parents app)
Information obligation	Parents receive information about the observation procedure during the intake
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	All data will be deleted after termination of the day care, unless external help has been called in. In that case a maximum of 2 years applies

Registration of personal data: Employees

Categories of people	Employees
Type of data and the purpose of the data processing	Name, address and place of residence data, telephone numbers, e-mail addresses: to be able to enter into a written contract of employment and to be able to pay salary
Legal grounds	The data of our employees have been obtained for entering into a written employment contract and for salary payments
The responsible person	General Management of De Kleine Wereld
The administrator	Employees HR department
The processor	Salary office
The users	HR department
The persons concerned	Employees
Third parties	None
The receivers	Employees HR department
Origin of data	Employees
Security guaranteed by	Digital files and login security of computer systems
Information obligation	Will be provided upon signing of the employment contract
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	Data in personnel file with regard to fiscal retention obligations: Maximum 7 years after termination of employment. Other data in the personnel file: Maximum 2 years after termination of employment

Registration of personal data: Job applicants

Categories of people	Job applicants
Type of data and the purpose of the data processing	Job application letter, form, correspondence concerning the application, testimonials, statement regarding behaviour, psychological examination.
Legal grounds	The applicant's data obtained from the applicant in connection with the application
The responsible person	General Management of De Kleine Wereld
The administrator	Employees of the HR department
The processor	HR office
The users	HR department
The persons concerned	Employees
Third parties	None
The receivers	Employees of the HR department
Origin of data	Employees
Security guaranteed by	Digital files and login security of computer systems
Information obligation	At the time of registration
Inspection, correction, protest	See the Privacy Statement of De Kleine Wereld.
Retention period	Up to 4 weeks without permission and a maximum of 1 year with the consent of the applicant.