

Privacy Policy

On this page, you will find the privacy policy of ClickMyBrain. This policy describes what personal data we collect, why we collect it and what we do with it. Furthermore, we explain how you can view, edit or delete your personal data.

ClickMyBrain is responsible for the processing of personal data as shown in this privacy statement.

This (renewed) privacy policy came into effect on November 20th, 2018.

Personal data we process

ClickMyBrain processes your personal data as you use our services and/or because you provide it to us.

Next is an overview of all the personal data we collect and process:

- Name and surname
- Gender
- Date of birth
- Address
- Phone number
- Mail address
- Other personal data you actively provide to us for example by creating an account on our website, through correspondence, and by phone.

For what purpose and based on what basis we process personal data

ClickMyBrain processes your personal data for one or more of the following purposes:

- To give you the possibility to create an account so you can use the ClickMyBrain platform;
- To call or email you when this is necessary for the execution of our services;
- To inform you about changes in our services and products;
- To send you the ClickMyBrain newsletter.

How long we save your personal data

ClickMyBrain saves your data no longer than necessary. We use a standard retention period of 2 years. This means that we will delete your data 2 years after you have been a member and/or active. If a different retention period applies, we will inform you about this.

Excluded from this 2 year retention period is data that we have to save longer because the law obliges us to do so, such as data for the tax authorities.

How we protect personal data

ClickMyBrain takes the protection of your personal data seriously. We take appropriate measures to protect your data from misuse, loss, unauthorized access, unsolicited disclosure, and unauthorized changes. In this way, we ensure that only the required persons have access to the data, that access to the data is protected and that our security measures are regularly monitored.

Do you have questions about the security of your data or evidence which indicate a possible vulnerability, please contact us via ralf@clickmybrain.com.

Sharing personal data with third parties

ClickMyBrain will only provide your data to third parties when this is necessary for the execution of our agreement with you or to comply with a legal obligation.

When we provide your data to a third party we ensure with an agreement that your data is not used for other purposes. We also agree that your data will be deleted as soon as they are no longer needed.

Furthermore, we will not provide your data to other parties, unless this is required by law. For example, the police may request data from us in the context of a fraud investigation. In that case, we are required by law to issue your data.

Cookies, or similar techniques, we use

ClickMyBrain uses technical and functional cookies only.

A cookie is a small text file that is stored on your computer, tablet or smartphone on your first visit to this website. The cookies we use are necessary for the technical operation of the website and for your ease of use. The cookies ensure that the website works properly as, for example, it remembers your personal preferences so that you remain logged in on the website if you want to. Furthermore, the cookies are also used to optimize our website.

You can decline the tracking by cookies by changing your internet browser to the setting of not storing cookies. In addition, you can also delete any information previously saved through your browser's settings.

For information: in addition to the technical and functional cookies, ClickMyBrain also uses analytical cookies. These cookies measure the website visit: for example, how often our site is visited. The statistics we collect cannot be redirected to people and are always used anonymously, so these cookies do not violate your privacy.

Minors

Our website and/or service does not have the intention to collect data of website visitors under 16. Unless they have explicit consent from their parents or guardian. However, we are not able to check if a visitor is older than 16. Therefore, to prevent the collection of personal data of

children without parental consent, we suggest parents be involved in the online activity of their children. If you are convinced that we processed personal data of a minor without parental consent, please contact us via ralf@clickmybrain.com. We will delete the information.

View, edit or delete your personal data

You have the right to view your, edit or delete personal data. In addition, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by ClickMyBrain and you have the right to data portability. This means that you can submit a request to us to send the personal information we have saved of you in a computer file to you or someone else, or an organization mentioned by you.

If you have an account at ClickMyBrain, you can log in to see and change your personal information. Furthermore, you can send a request for inspection, correction, deletion, or data transfer of your personal data or request for cancellation of your consent or objection to the processing of your personal data to ralf@clickmybrain.com.

To ensure that the request for inspection has been made by you, we ask you to send a copy of your ID with the request. In this copy, strikethrough/mark black your passport photo, MRZ (Machine Readable Zone: the strip with numbers at the bottom of the passport), passport number and Citizen Service Number (BSN) to protect your privacy. We respond as quickly as possible, but within four weeks, upon your request.

Of course, we are happy to help you if you have any complaints about the processing of your personal data. If despite this, we are not able to work things out together, you also have the right under the privacy legislation to file a complaint with the national supervisory authority: the Dutch Data Protection Authority. You can do this via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons> (unfortunately, only available in Dutch).

Contact details:

www.ClickMyBrain.com

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Ralf Tigges is the Data Protection Officer of ClickMyBrain. You can reach him via: ralf@clickmybrain.com.