

Privacy Policy

Coöperatie Frank & the Backs U.A., located at Zuid-Hollandlaan 7, 2596 AL The Hague, The Netherlands, is committed to processing data in accordance with its responsibilities under the GDPR (General Data Protection Regulation).

1. Personal Data and general provisions

This policy applies to all Personal Data, including Personal Data and company data, hereinafter also referred to as Personal Data, processed by Frank & the Backs.

Frank & the Backs will appoint a responsible person who shall take responsibility for its ongoing compliance with this policy. This policy shall be reviewed at least annually.

Personal Data that Frank & the Backs collects and processes include: name, date of birth, (home) address, personal e-mail, telephone number(s), BSN (Dutch citizen service number), copy of ID, professional references, copy of permits/visa where applicable, financial information for payroll and tax purposes and photographs for internal and external use by Frank & the Backs.

Furthermore Frank & the Backs collects and processes personal data to meet its legal, statutory and contractual obligations and to enable it to fulfill its role as employer, service-provider or otherwise in the course of a relationship between third parties.

2. Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, Frank & the Backs shall maintain a register of its systems or contexts in which Personal Data is processed (hereinafter referred to as 'Register of Systems').

Individuals and companies have the right to access their Personal Data and any such request made to Frank & the Backs shall be dealt with in a timely manner.

3. Lawful purposes

All Personal Data processed by Frank & the Backs must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.

Frank & the Backs shall note the appropriate lawful basis in the Register of Systems.

Where consent is relied upon as a lawful basis for processing data, evidence of opt in consent shall be kept with the Personal Data.

Where communications are sent to individuals or companies based on their consent, the option for the individual or company to revoke the consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Frank & the Backs' systems.

4. Data minimization and accuracy

Frank & the Backs shall ensure that Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. Frank & the Backs shall take reasonable steps to ensure Personal Data is accurate.

5. Special and/or sensitive Personal Data

Frank & the Backs does not intend to collect special and/or sensitive Personal Data from website visitors.

6. Relevant data and purpose to collect and process such data

Frank & the Backs processes Personal Data because individuals and companies use its services, or render services to Frank & the Backs, or are otherwise associated with Frank & the Backs and provide this data to the organization.

Below an overview of the Personal Data that Frank & the Back processes:

- name company
- first and last name founder
- address
- phone number
- e-mail address

Frank & the Backs processes data for the following purposes:

- E-mail and/or phone contact and/or compliance

Being able to call or e-mail individuals or companies, if this is necessary, to be able to provide services, or to allow other parties to render services to Frank & the Backs, or to comply with its legal and fiduciary duties in accordance with applicable law.

- Click behavior on the website

General visitor data is recorded on the website. In this context, in particular, the IP address of the visitor's computer, the possible username, the time of retrieval and data sent by a visitor's browser is recorded and used for statistical analysis of visit and click behavior on the website. With this, Frank & the Backs optimizes the functioning of the website and tries to anonymize this data as much as possible. This information is not provided to third parties.

- Newsletter and/or other communications

Frank & the Backs regularly sends out a newsletter and other communications to inform clients and other interested parties about services, events and related matters. An e-mail address will only be added to the list of subscribers after explicit consent. Every newsletter contains an unsubscribe link. The newsletter subscriber file is not provided to third parties. The same applies mutatis mutandis for other communications.

- Application

During the application process a selection team of Frank & the Backs reviews data of applicants and decides whether Frank & the Backs can be a partner or service provider. Frank & the Backs saves application data for future social/business networking opportunities. Frank & the Backs will remove any Personal Data from applicants from its system at any time upon first request.

7. Archiving/removal

Frank & the Backs does not store Personal Data for longer than is strictly necessary to achieve the purposes for which the data are collected.

Frank & the Backs uses the following retention periods for the next categories of Personal Data:

- Customer data > 5 years after the termination of cooperation
- Personal Data of program participants > 5 years after the end of program
- CVs and motivation letters of possible employees or interns > in the event of rejection, all documents will be deleted after 10 weeks, including the e-mails containing this information and appendices that are attached
- Personal Data subscribers newsletter > until the moment of unsubscribing
- Other Personal Data in accordance with applicable law

When Personal Data is deleted this should be done safely such that the Personal Data is irrecoverable.

8. Sharing of Personal Data and security

Frank & the Backs does not sell Personal Data to third parties and will only provide this to a third party if this is necessary for the execution of the cooperation with clients or to comply with a legal obligation. Frank & the Backs shall ensure that Personal Data is stored securely using modern software that is kept up-to-date. Frank & the Backs may enter into an agreement with companies that process Personal Data on its behalf, to ensure the same level of security and confidentiality. Frank & the Backs remains responsible for these processes.



Access to Personal Data shall be limited to those team members on a need to know basis only and appropriate security should be in place to avoid any unauthorized use.

Appropriate back up and disaster recovery solutions shall be in place.

9. Cookies/similar technologies used

Frank & the Backs may use Google Analytics, Plausible Analytics or similar tools.

10. See, modify, or delete data

Every individual of who, or company of which, Frank & the Backs holds Personal Data has the right to view, correct or delete its Personal Data.

Every individual of who, or company of which, Frank & the Backs holds Personal Data has the right to withdraw its consent for data processing, or to object to the processing of data by Frank & the Backs and has the right to data transferability.

Data transferability can be realized by submitting a request thereto to Frank & the Backs. Upon such a request Frank & the Backs sends the Personal Data that it holds about the requesting party to the latter.

Such a request for access, correction, deletion, data transfer of data or request for withdrawal of consent or objection to the processing of data should be sent to officemanager@frankandthebacks.com.

An owner of Personal Data as referred to in this policy can file a complaint with the [Dutch Data Protection Authority](#).

11. Personal Data protection and breach

Frank & the Backs takes the protection of Personal Data seriously and takes appropriate measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes to counteract. In case of indications that Personal Data are not properly protected or indications of abuse, please contact Frank & the Backs immediately via officemanager@frankandthebacks.com.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data, Frank & the Backs shall promptly assess the risk and, if appropriate, report this breach to the Dutch Data Protection Authority.

12. Adjust privacy statement

Frank & the Backs reserves the right to adjust this Privacy Policy.

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