

Privacy policy D.W.V. Hardboard

1. Introduction

- 1.1 We are committed to safeguarding the privacy of *members*.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of *the members of D.W.V. Hardboard*, in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of *dwvhardboard.nl, wolk.dwvhardboard.nl and wiki.dwvhardboard.nl*.
- 1.4 In this policy, "we", "us" and "our" refer to *D.W.V. Hardboard*. For more information about our terms and conditions, see <https://www.dwvhardboard.nl/papierwinkel>.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address. The source of the usage data is *Drupal*. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your account data ("**account data**"). The account data may include your name, email address and address date. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is *our legitimate interests, namely the proper administration of our website and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract*.
- 3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, date of registration, address, telephone number, email address, profile pictures,

gender, date of birth, level of wind-, kite-, wavesurfing, wakeboarding and snowboarding, the ownership of Hardboard driving licences, the access to the accommodation key and the ownership of an IVA certificate. The profile data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us.

- 3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include survey data and data we temporarily need for activities and trips. [The source of the service data is you.] The service data may be processed providing our services and communicating with you]. The legal basis for this processing is [consent].
- 3.6 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, and bank details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us.
- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications for surfing days ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is consent
- 3.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 We may disclose your profile data to any member of our association (this means any member or donors of D.W.V. Hardboard. Members can find this information about at <https://www.dwvhardboard.nl/feesboek> at your Hardboard profile.
- 4.2 We may disclose [your profile data] to [one or more of those selected third party suppliers of goods and services] for the purpose of [enabling them to provide you their services]. [Each such third party will act as a data controller in relation to the profile data that we supply to it, comply to the processing agreement that we have concluded with them.]

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes unless it is

agreed upon by the (ex-)member, who becomes a regular donor to the association.

5.3 We will retain your personal data as follows:

(a) **Service data**, for a definition see section 3.5, will be retained for the minimum period of the duration of the activity and for the maximum period of 1 year.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) The period of retention of **account data, usage data, profile data, transaction data and notification data** will be determined based on the duration of time the membership agreement is standing.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We will notify you of significant changes in this privacy policy by email.

7. Your rights

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. You can access your personal data by visiting your profile page on the website when logged into our website.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: [the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds

relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us-

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

9.1 We use cookies for the following purposes:

- (a) status - we use cookies to help us to determine if you are logged into our website and if you are able to use javascript (cookies used for this purpose are: *session cookies*);

10. Cookies used by our service providers

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 Windy.com uses Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: *_ga*, *_gt* and *_gid*.

11. Managing cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - (e) <https://support.apple.com/kb/PH21411> (Safari); and
 - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3 If you block cookies, you will not be able to use all the features on our website.

12. Our details

- 12.1 This website is owned and operated by *D.W.V. Hardboard*.
- 12.2 We are registered in Enschede under registration number 40075992, and our registered office is at Drienerlolaan 5 7522 NB Enschede.
- 12.3 Our principal place of business is at Drienerlolaan 5, 7522 NB Enschede.
- 12.4 You can contact us:

- (a) by post, to
D.W.V. Hardboard, Sportcentrum, Postbus 217, 7500 AE, Enschede;
- (b) by telephone, on +31648412548; or
- (c) by email, using privacy@dwvhardboard.nl

13. Data protection officer

13.1 Our data protection officer's contact details are: privacy@dwvhardboard.nl.