

Privacy Statement of Edufax Assessments and Courses

Edufax provides education services to employers and expat families within the context of international relocation. This page contains the privacy statement of Edufax B.V. ('Edufax') that specifically covers the courses and assessments provided by Edufax. You can consult the relevant privacy statements for our other forms of service elsewhere on this website.

This privacy statement provides information about the data that Edufax processes of employers and their contact persons, expat families and users of the website(s) www.edufax.nl and www.edufaxonline.nl for the purpose of providing assessments and courses.

As this privacy statement is subject to change, we recommend that you consult it often. This privacy statement was last amended on 1 November 2018.

1. Who is responsible for processing your personal data?

When you use Edufax's services in the area of assessments and courses, we process the data you provide to us. Edufax is the controller for processing your personal data under the General Data Protection Regulation ('GDPR'). This means that Edufax is responsible for what happens to your data.

We realise that we are processing many of your and your children's special and other personal data. We therefore consider it our responsibility to treat your data with the utmost care and confidentiality.

You can contact us at any time if you have any questions about this privacy policy. Our details are:

Edufax B.V.
Valkenswaardseweg 3a
5595 CA Leende
Telephone +31 (0) 402047470
E-mail info@edufax.nl

We are also on the following social media channels:

YouTube <https://www.youtube.com/user/EdufaxNL>
Twitter <https://twitter.com/edufaxnl?lang=nl>
Facebook <https://www.facebook.com/EdufaxNL/>
LinkedIn <https://www.linkedin.com/company/edufax>

2. Which data are collected and why?

For the purpose of conducting assessments, organising preparatory language courses and extra lessons and giving educational advice in relation to international relocations, we process several special and other personal data of expat families.

More specifically, we collect and retain the following data relating to you (by category):

Category	Personal data
Assessments	For the purpose of providing placement advice for an international change of school, we process several special and other personal data of

	<p>you and your child/children. These include name and address details, educational data, details about the assignment and any medical data, if applicable.</p> <p>The placement advice is based on the existing specific data of a child, supplemented with the data obtained by conducting the assessments: capacity assessment, educational achievements, performance/motivation assessment, self-esteem assessment and career interest assessment.</p> <p>We obtain, retain and process these data exclusively for the purpose of providing placement advice. All our advice is given with the best interests of the child in mind. The results and conclusions of the assessments and the ensuing placement advice are recorded in an assessment report.</p> <p>If the employer is the client, a placement assessment is also intended to inform the employer about the costs and possible risks in the area of education that the international relocation of their employee might entail. The conclusions that can be drawn about these aspects (the placement advice and any expected additional costs) will be shared with your employer only with your consent. The full assessment report will only be provided to you. Your children's medical data are not shared with your employer.</p> <p>In certain cases, the data of expat families are shared with third-party organisations. More information about this exchange of data can be found under the heading <i>'With whom will my data be shared?'</i></p>
<p>Language courses/extra lessons prior to/after an international relocation</p>	<p>For the purpose of organising language courses prior to an international relocation or extra lessons after an international relocation (referred to below as 'the course', we process several special and other personal data of you and your child/children. The following data are involved:</p> <ul style="list-style-type: none"> - Name and address details - Contact details - Details about the assignment - Contact details of the day school <p>To determine what type of course is needed (which language/subject, how many hours, course content) and where it should take place, we request several special and other personal data from you about you and/or your child/children. These data are retained and processed to find a suitable freelance teacher for this course. These data are also used to give the freelance teacher sufficient background on the content and approach of the course.</p> <p>If the course takes place at the child's day school, we ask this school for consent to have the child's lessons given there during school time. We do this only if you have given your consent for this purpose.</p> <p>The freelance teacher shares information about the development, progress and results of the course with Edufax and the student/the student's parents to be able to make adjustments if the course does not match wishes or expectations and to evaluate the quality of the course and the teacher. Edufax retains this information in its system.</p>

	<p>If the employer is the client, Edufax will ask the employer's consent to offer this service and inform the employer if the service has not been fully used. Further information on development, progress and results is not shared with the employer, unless it is important. In those exceptional cases, you will be asked for consent to share this information with the employer.</p> <p>In certain cases, the data of expat families are shared with third-party organisations. More information about this exchange of data can be found under the heading '<i>With whom will my data be shared?</i>'</p>
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3. What is the legal basis for using my data?

a) *Data processing is necessary to perform the agreement between you and Edufax*

We process most of your personal data because processing these data is necessary to perform the service that has been agreed directly with you or your employer. These personal data are then necessary, for example, to be able to give educational advice and draw up an Educational Mobility Report (EMR) for you and possibly your employer.

b) *Data processing is necessary for Edufax to comply with its statutory obligation*

Edufax supports employers and expat families with educational issues. There are several laws that Edufax must observe. These regulations require us to process certain personal data about you. For this reason, we may also be obliged to provide your data to third parties.

c) *Data processing is necessary to look after Edufax's legitimate interests.*

We want to offer you the best possible service. To do this, we process your personal data. This is the case, for example, when sending e-mails, visiting our website and promoting our social media channels. We always consider your privacy interests and your data will be stored as anonymously as possible.

d) *You have consented to the data processing*

For all other matters, we will use your data only with your consent. This is the case, for example, when we want to share the EMR with your employer.

4. How are my data secured?

Your privacy is of paramount importance to us and we ensure that your data are treated confidentially and with the utmost care. We have therefore adopted appropriate technical and organisational security measures against the loss, theft or otherwise unlawful processing of these data. For example, we ensure that only the necessary persons have access to your data, that access to the data is restricted, and that our security measures are regularly checked. We also encrypt e-mails and other messages containing special personal data.

5. How long will my data be retained?

We do not retain your data longer than necessary to achieve the purposes stated in this privacy statement or if we must comply with statutory retention periods. For the retention period of data collected via cookies, please refer to the cookie statement.

After the retention period expires, we delete all data that can be traced back to you. Anonymised data may be stored for longer.

6. With whom will my data be shared?

We will not provide your data to third parties without your prior consent, unless this is necessary to perform the agreement or if we are required to do so by law.

We may also forward your data to the following organisations that process data on our instructions:

- Employer (if the employer pays the invoice directly): we share the conclusions of a placement assessment insofar as they relate to risks and extra costs for the employer. We do this only with your express consent as the employee. We also inform the employer if any of the purchased services have not been fully performed;
- School: to give appropriate placement advice or be able to start remedial teaching (RT)/extra lessons correctly, it is sometimes necessary to contact a potential future school and/or the current day school. In case of such contact, special personal data of your child/children may be exchanged (e.g. school/assessment results or details of learning or behavioural problems). These data will be exchanged only if you as parent/guardian have given your explicit consent;
- Freelance teachers: we share students' personal data with the freelance teacher to provide sufficient background information. The freelance teacher uses these data solely for the course/RT and does not share them with third parties, unless you as parent/guardian have consented to data being exchanged between the school and freelance teacher;
- Freelance researcher: placement assessments are sometimes partly performed by a freelance researcher. In that case, we share the data of the child who is to be assessed with this researcher to provide sufficient background information. This researcher uses these data solely to perform the assessment and does not share them with third parties;
- External ICT suppliers: we have made written arrangements with these organisations about the handling of your personal data and what they may and may not do with these data.

7. What rights do I have regarding data processing?

As the data subject of the data processing, you have various rights under the GDPR. These are:

Access to, rectification and removal of your data

You may request access to the data Edufax processes about you at any time (free of charge) and have them rectified or removed by sending a request to info@edufax.nl. Following this request for access, you may request Edufax to rectify or remove your personal data.

Complaint to the Dutch Data Protection Authority

In the unlikely event that you believe that we are not handling your personal data with care, you can contact us using the contact details above. You also have the right to submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

Objection to the processing of your personal data

You may object to the processing of your personal data by Edufax if your personal data are used for purposes other than those necessary to perform an agreement or comply with a statutory obligation. For example, you may object to the use of your personal data for marketing activities by e-mail. You can do this by sending an e-mail to info@edufax.nl.

Should you object to the processing of your personal data when this is necessary for us to perform our work, we must point out that it will not be possible to provide our services to you without your personal data.

Right to data portability

You also have the right to data portability. This is the right to obtain personal data about you that you have provided to Edufax in a clear format. For this purpose, too, you can send an e-mail to info@edufax.nl.

8. Who can I contact with other questions?

If you have further questions and/or comments after reading this privacy statement, contact us using the contact details above.