

# Privacy Statement of Edufax Consultancy

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Edufax provides education services to employers and expat families within the context of international relocation. This page contains the privacy statement of Edfax B.V. ('Edufax') that specifically covers the consultancy services Edufax offers to employers and expat families. 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](http://www.edufax.nl) and [www.edufaxonline.nl](http://www.edufaxonline.nl) for the purpose of advising on educational issues in international relocation.

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?

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If you use Edufax's consultancy services, 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 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](mailto:info@edufax.nl)

We are also on the following social media channels:

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

## 2 Which data are collected and why?

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For the purpose of providing educational advice in relation to international relocations, we process several data of expat families.

Educational advice is given based on screening, possibly followed by a consultation to identify the educational consequences, costs and any risks. In this context, we request specific special and other personal data from you that we process and retain. These include name and address details, educational data and any medical data, if applicable. More specifically, we process the following data:

- Name and address details
- Contact details
- Family composition
- Details about the assignment
- School reports
- Student file of the day school

We process these data with the aim of providing you as a family with all necessary educational advice. All our recommendations as recorded in the Educational Mobility Report (EMR) are made with the best interests of the child in mind.

If the employer is the client, this advice is also intended to inform the employer about the costs and possible risks in the area of education that your international relocation as an employee may entail. The EMR is shared with your employer only with your express consent.

To keep a close eye on the child's educational development, we regularly contact families. This can be done by e-mail, phone, Skype and WhatsApp. If necessary, the EMR will be adapted and saved based on such contact. If you have given consent, the adapted EMR will be shared with your employer.

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 *'With whom will my data be shared?'*

### 3 What is the legal basis for using my data?

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#### 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 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 explicitly consented to the data processing

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

#### 4 How are my data secured?

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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?

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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?

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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 original and adapted EMR with the employer after you, as the employee, have given your consent, insofar as that is necessary for the employer. See the additional comment about this below.
- School: to give appropriate advice, it is sometimes necessary to contact a potential future school and/or the current day school. Sometimes this can be done anonymously (for example, to find out whether there is room at a school), sometimes it requires the exchange of special and other personal data (for example, to determine a child's correct placement or what support is needed). In those cases, this contact will be made only if you, as the parent, have explicitly given us consent to share these special and other personal data of you or your child/children with this school;
- External ICT supplier(s): 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.

We will provide the employer with an Educational Mobility Report. This report contains the same personal data which was shared with Edufax by the employer. The EMR may also contain:

- Advice regarding the overall education of the child
- A risk assessment concerning the education of the child
- An overview of the educational background, present education and the expected educational path on return.
- Optional: extra information about any discrepancies in the educational development of the child. This may include information about special educational needs.

## 7 What rights do I have regarding data processing?

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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](mailto: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](mailto: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](mailto:info@edufax.nl).

## 8 Who can I contact with other questions?

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