**PRIVACY STATEMENT Cohen Psychologen**

Cohen Psychologen, located at Zwaansvliet 5, 1081AP in Amsterdam and registered with the Chamber of Commerce under number 58391991, highly values the protection of personal data. This privacy statement explains how Cohen Psychologen deals with information about identified or identifiable natural persons, as referred to in the General Data Protection Regulation (GDPR).

**1. Application**

This privacy statement applies to the following categories of natural persons of whom Cohen Psychologen processes personal data:

1. (potential) patients;
2. visitors to the practice of Cohen Psychologen;
3. visitors to cohenpsychologen.nl;
4. participants in meetings of Cohen Psychologen;
5. applicants;
6. all other persons who contact Cohen Psychologen or of whom Cohen Psychologen processes personal data, with the exception of its employees.

**2. Processing of personal data**

Cohen Psychologen processes personal data:

1. personally provided by the person concerned (during a meeting or discussion), by telephone, or digitally (via e-mail or web forms on the website), such as contact details or other personal data;
2. that was obtained from other care providers or referrers with the permission of the person concerned;
3. that was generated during a visit by a person concerned to the website of Cohen Psychologen such as IP address, the surfing behavior on the website (such as data of the first visit, previous visit and current visit, pages accessed and the way in which the website was navigated) and items clicked by the person concerned;
4. In the general practices where psychologists from Cohen Psychologen work, camera images are made by the location managers. The reason for this is protection of employee and/or patients and proper protection of personal property of employees and/or patients against theft and damage. The recordings are only used for the following purposes:

- Protection of employees (feel of safety)

- Protection of personal property of employees and patients

- The protection of the entrance of the practice protection of confidential information.

The following guidelines apply to the use of the cameras:

- Depending on the amount of recorded image recordings, the images are stored for a few days. The images are automatically deleted by means of overwriting.

-  The recordings are not used to monitor employees. The retrieval of recorded images will only take place when an incident has taken place. In that case, the images will be kept until after the incident has been dealt with.

- The public is informed by means of a sign or sticker at the entrance of the centre with the text 'camera surveillance' (camera toezicht).

- Facility manager and on-site supervisors have access to the images.

- The supplier of the recording equipment will capture the images, if usable and at the request of the facility manager, and transfer them for investigation by the police.

**3. Purposes processing**

Cohen Psychologen will process personal data for the following purposes:

1. the execution of medical treatment contracts and invoicing of services performed;
2. maintaining contact, invitations for meetings and information requested by the person concerned;
3. tracking user statistics. User statistics of the website provide information about the number of visitors, the duration of their visits, which parts of the website are accessed and the click behavior. It concerns generic reports that are non-personally identifiable;
4. monitoring access to practice and protecting confidential data.

**4. Legal basis**

Cohen Psychologen processes personal data on the basis of one of the following legal grounds:

1. consent of the person concerned. This permission can always be withdrawn, but withdrawal will not affect the lawfulness of the processing on the basis of the permission before the withdrawal;
2. execution of or with a view to the conclusion of medical treatment agreements, including invoicing to third parties, such as the health insurance company and the like;
3. legal obligations, such as the obligation to keep medical records or to register BSNs;
4. a legitimate interest, such as the use of contact information for sending invitations for a meeting.

**5. Processors**

Cohen Psychologen may use service providers (processors) for the processing of personal data who will only process personal data according to instructions from Cohen Psychologen. Cohen Psychologen will conclude a processor agreement with processors that meets the requirements of the General Data Protection Regulation (GDPR/AVG).

**6. Share personal data with third parties**

Cohen Psychologen will share personal information with third parties, if this is indicated in the context of the treatment (for example a referral) or if necessary to comply with legal obligations. Cohen Psychologen will not share personal data with third parties for commercial purposes, unless meetings are organized together with another organization. In that case, only the required contact information will be shared.

**7. Transfer outside the EEA**

Cohen Psychologen does not, in principle, transfer personal data to countries outside the European Economic Area (EEA). If this should nevertheless be necessary, Cohen Psychologen ensures that the transfer will only take place if the European Commission has indicated that the relevant country provides an adequate level of protection or if there are appropriate safeguards within the meaning of the General Data Protection Regulation (GDPR/AVG).

**8. Storage of data**

Cohen Psychologen will not store any personal data longer than necessary. In principle Cohen Psychologen will use the following retention periods:

1. medical data: at least 20 years after the end of the treatment agreement;
2. (financial) administrative data: 7 years after recording the data;
3. data of employees and freelancers, other than (financial) administrative data: 5 years after termination of employment or after the end of the assignment agreement;
4. details of applicants: 6 months after completion of the application procedure;
5. visitors to the website: 5 years after the last visit to the website, unless an objection is made in which case the data will be deleted.

**9. Changes to privacy statement**

Cohen Psychologen may change this privacy statement at any time. An up-to-date version of the privacy statement will be published on the website of Cohen Psychologen. It is advisable to consult this privacy statement regularly so that you are aware of any changes.

**10. Rights, questions and complaints**

You have the right to request Cohen Psychologen to view, rectify, delete, transfer, limit processing and to object to processing. You can contact Cohen Psychologen by sending an e-mail message to cohen.jb@protonmail.com.

For questions or complaints about the way in which Cohen Psychologen processes personal data, you can also contact Cohen Psychologen by sending an e-mail message to cohen.jb@protonmail.com. We will try to resolve complaints satisfactorily. If no satisfactory solution is reached, you can contact the Dutch Data Protection Authority (AP).