

Privacybeleid

MOTOR LEARNING INSTITUTE

May 1, 2021

Introduction

MOTOR LEARNING INSTITUTE takes your privacy very seriously and will process and use information about you (the person concerned) in a secure manner. In this Privacy Statement we explain to you which data we process and for what purpose we do this. In addition, you can read in this Privacy Statement about your rights with regard to our processing of your personal data. We recommend that you read this Privacy Statement carefully. For questions you can always contact askus@motorlearninginstitute.com.

Who is MOTOR LEARNING INSTITUTE?

The partnership MOTOR LEARNING INSTITUTE, with its registered office at (9761 KP) Eelde at Zuurstukken 31, registered in the trade register of the Chamber of Commerce under number 82065624. When MOTOR LEARNING INSTITUTE processes your personal data, MOTOR LEARNING INSTITUTE is the controller.

1. General

- This privacy policy has been drawn up to inform the person concerned about the way MOTOR LEARNING INSTITUTE handles personal data. We have taken appropriate technical and organizational measures to secure and process the personal data collected by us as carefully as possible.
- This privacy policy applies to the personal data we process in connection with your interaction with MOTOR LEARNING INSTITUTE.
- This document contains 14 pages.
- This privacy policy is applicable from May 1, 2021. MOTOR LEARNING INSTITUTE reserves the right to make changes to this privacy policy. Changes will be published on our website. Therefore, check this privacy policy regularly, so that the person concerned is aware of any changes.
- Below you will find an overview of the purposes for which MOTOR LEARNING INSTITUTE processes personal data about you. In each case, it is indicated which data MOTOR LEARNING INSTITUTE uses for that specific purpose, what the legal basis is for processing that data and how long the data is kept by MOTOR LEARNING INSTITUTE. To keep things organized, we have grouped everything by type of data flow.

2. Definitions

1. In this document we define as follows:
 - a. privacy policy: this document;
 - b. MOTOR LEARNING INSTITUTE: SOCIETY MOTOR LEARNING INSTITUTE;

- c. client: the party that instructs MOTOR LEARNING INSTITUTE;
- d. person concerned: an identified or identifiable natural person;
- e. personal data: all information about a person concerned; an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more elements characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person;

3. Ground

1. MOTOR LEARNING INSTITUTE processes personal data in the following cases:
 1. if the person concerned subject visits our website;
 2. as a person concerned participates in our courses, events, presentations and meetings;
 3. if the person concerned is a client or works for it;
 4. if we process your personal data on behalf of a client;
 5. if the person concerned is or works for a supplier;
 6. if the person concerned contacts us by e-mail, via the website or by telephone;
 7. if the person concerned applies for a position at MOTOR LEARNING INSTITUTE;
 8. if MOTOR LEARNING INSTITUTE wants to improve and promote its services;
 9. if MOTOR LEARNING INSTITUTE provides personal data to defend itself;
 10. if MOTOR LEARNING INSTITUTE is required to provide personal data;
 11. if MOTOR LEARNING INSTITUTE provides personal data in the context of a sale, acquisition or merger.

The above situations are explained in more detail in Chapter 4. **We explain the following for each of these situations:**

***preface**

***purposes**

***ground**

***personal data...**

...

2. Privacy laws and regulations give organizations a number of grounds for processing personal data. MOTOR LEARNING INSTITUTE also relies on a number of these grounds to process personal data. These are explained below:

- MOTOR LEARNING INSTITUTE may process personal data when it has a legitimate interest to do so.
- In some cases, MOTOR LEARNING INSTITUTE requires the consent of the person concerned before it is allowed to process personal data. In those cases, we will always explicitly ask for permission from the person concerned.
- When the person concerned has an agreement with MOTOR LEARNING INSTITUTE, MOTOR LEARNING INSTITUTE may have to process personal data for the execution of the agreement. In this way MOTOR LEARNING INSTITUTE can fulfill the obligations under this agreement.
- In order to comply with legal obligations, MOTOR LEARNING INSTITUTE must process personal data. Law enforcement officers and regulators may require us to do so.

In chapter 4 we refer to these grounds to indicate why we believe we process this personal data. (The GDPR lists other grounds for processing personal data; these do not apply here to our relationship with the person concerned.)

4. Processing personal data

1. If person concerned visits our website

- introduction: The website of MOTOR LEARNING INSTITUTE is on servers of Knaalgeel and uses cookies (Google Tag Manager) from Google Analytics to keep track of how users use the website. This information is transferred to and stored by Google on servers in the United States. MOTOR LEARNING INSTITUTE has set up Google Analytics as privacy-friendly as possible as recommended by the Dutch Data Protection Authority in its publication “Guide to privacy-friendly setting of Google Analytics”. Among other things, the IP address is pseudonymized by masking its last octet and we have turned off data sharing. MOTOR LEARNING INSTITUTE does not use other Google services in combination with Google Analytics. The Dutch Data Protection Authority is (nevertheless) of the opinion that the remaining part of the IP address is still personal data. A detailed explanation can be found in our 'Cookie statement', which can be downloaded from www.motor-learninginstitute.com.
- personal data: The personal data that MOTOR LEARNING INSTITUTE (possibly) processes for this purpose are:
 - date and time at which the person concerned visits the website;
 - specific pages that the person concerned visits;
 - (rough approximation of) location where the person concerned is located;
 - speed at which the page loads;
 - duration of the visit by the person concerned;

- properties and settings of the device, operating system, screen and browser with which the person concerned visits the website;
 - network of person concerned;
 - UTM tags (medium, source and campaign) that the person concerned uses in a link to the website.
- purposes: If the person concerned visits our website, we use personal data to:
 - keep track of how the person concerned uses the website;
 - to make improvements to the website;
 - measure results of marketing campaigns (using UTM tags).
- Ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. As a person concerned visits our website, we rely on the following grounds:
 - The Dutch Data Protection Authority confirms in its publication “Privacy-friendly setting of Google Analytics manual” that no permission is required for analytical cookies, as these have no or minor consequences for the privacy of the person concerned. MOTOR LEARNING INSTITUTE processes personal data with these analytical cookies and invokes the necessity to represent its legitimate interest. MOTOR LEARNING INSTITUTE is therefore not required to request permission for this processing of personal data under the GDPR.
- origin: The personal data comes from:
 - the Google Analytics cookies therefore originate from the person concerned and are generated by using the website.
- retention period: MOTOR LEARNING INSTITUTE has set the data retention period for users and events to 38 months.
2. As a person concerned participates in our courses, events, presentations and meetings
- introduction: By sending a “Conversion button” the person concerned provides the entered personal data to MOTOR LEARNING INSTITUTE. These forms are created by using a mail server, which makes it possible to send the personal data. It is also possible that courses, events, presentations and meetings can be scheduled via the Google agenda or email MOTOR LEARNING INSTITUTE, after which the invitation is sent. MOTOR LEARNING INSTITUTE then processes the personal data within the MOTOR LEARNING INSTITUTE platform and the local calendars/diaries of MOTOR LEARNING INSTITUTE staff. For organizing (especially online) courses, events, presentations and meetings, it is possible that personal data (such as name of the per-

son concerned) of the person concerned is visible to other participants via the Zoom platform. If desired, the participant can change the name in the settings.

- personal data: The following personal data are (possibly) processed by us:
 - name of the person concerned;
 - the organization on whose behalf the person concerned registers;
 - e-mail address of the person concerned and therefore (on the basis of the domain name) possibly the organization for which the person concerned works;
 - billing address;
 - choice of events, training courses, presentations and meetings in which the person concerned wishes to participate;
 - information (including the bank account number) regarding payment of amounts due.

 - purposes: If the person concerned participates in our courses, events, presentations and meetings, we process personal data to:
 - to be able to maintain contact with the person concerned about details of courses, events, presentations and meetings;
 - to be able to settle payment for courses, events, presentations and meetings;
 - to make technically possible (especially online) courses, events, presentations and meetings;

 - ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. As a person concerned participates in our events, we rely on the following grounds:
 - the person concerned gives permission via the “Conversion button”;
 - MOTOR LEARNING INSTITUTE processes the personal data to fulfill an agreement with the person concerned;
 - MOTOR LEARNING INSTITUTE must comply with legal obligations with regard to financial administration.

 - origin: The personal data comes from: the “Conversion button” that the person concerned clicks; the settlement of the payment.

 - retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.
3. If the person concerned is a customer
- introduction: MOTOR LEARNING INSTITUTE carries out work for customers. In order to be able to have normal business contact with each other, MOTOR LEARN-

ING INSTITUTE processes personal data of the person concerned. MOTOR LEARNING INSTITUTE processes the personal data within Apple's OS environment.

- personal data: The personal data that MOTOR LEARNING INSTITUTE (possibly) processes for this purpose are:
 - name;
 - e-mail address and therefore (on the basis of the domain name) possibly the organization for which the person concerned works;
 - telephone number;
 - title;
 - function;
 - customer information;
 - signature.

 - purposes: If the person concerned is a customer, we use personal data to:
 - to fulfil the obligations arising therefrom;
 - manage the customer relationship.

 - ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. If the person concerned is a customer, we rely on the following grounds:
 - MOTOR LEARNING INSTITUTE has a legitimate interest in processing personal data;
 - we process personal data to fulfil an agreement with the customer;
 - in order to comply with legal obligations, MOTOR LEARNING INSTITUTE must process personal data for the purposes of its financial administration.

 - origin: The personal data comes from:
 - the agreement MOTOR LEARNING INSTITUTE has with the customer;
 - the trade register of the Chamber of Commerce;
 - communication with the person concerned.

 - retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.
4. If we process your personal data on behalf of a customer
- introduction: As part of the work that MOTOR LEARNING INSTITUTE performs for a customer, MOTOR LEARNING INSTITUTE may need to process personal data on behalf of the customer. MOTOR LEARNING INSTITUTE then processes the personal data within Apple's OS environment.

- personal data: It can differ greatly which personal data MOTOR LEARNING INSTITUTE processes; this depends on the work MOTOR LEARNING INSTITUTE performs for customer.
- purposes: We only process this personal data to:
 - to fulfil the obligations arising from an agreement.
- ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. If we process personal data on behalf of you as a customer, we rely on the following grounds:
 - MOTOR LEARNING INSTITUTE processes the personal data to fulfil an agreement with the customer.
- origin: The personal data that MOTOR LEARNING INSTITUTE processes in this case come from:
 - the customer;
 - public sources.
- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.

5. If the person concerned is or works for a supplier

- introduction: In order to have normal business contact with a supplier, MOTOR LEARNING INSTITUTE processes personal data. MOTOR LEARNING INSTITUTE then processes the personal data within Apple's OS environment.
- personal data: The personal data that MOTOR LEARNING INSTITUTE (possibly) has at its disposal for this purpose are:
 - name;
 - e-mail address and therefore (on the basis of the domain name) possibly the organization for which the person concerned works;
 - telephone number;
 - title;
 - function;
 - customer information;
 - signature.
- purposes: If we process your personal data on behalf of a customer, we use personal data to:

- to fulfil the obligations arising therefrom;
 - manage the customer relationship.
- Ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. If we process your personal data on behalf of a customer, we rely on the following grounds:
 - MOTOR LEARNING INSTITUTE has a legitimate interest in processing personal data;
 - the person concerned gives permission for the processing of personal data by means of the standard contract of assignment and associated general terms and conditions for hiring MOTOR LEARNING INSTITUTE;
 - MOTOR LEARNING INSTITUTE processes personal data to fulfil an agreement;
 - in order to comply with legal obligations, MOTOR LEARNING INSTITUTE must process personal data for the purposes of its financial administration.
- origin: The personal data comes from the agreement MOTOR LEARNING INSTITUTE has with
 - the customer;
 - the trade register of the Chamber of Commerce;
 - communication with the person concerned.
- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.

6. If person concerned contacts us

- introduction: When the person concerned contacts MOTOR LEARNING INSTITUTE by e-mail, messages are processed within Apple's OS environment. By sending the contact form on our website, the person concerned uses the MOTOR LEARNING INSTITUTE web server and mail server, after which MOTOR LEARNING INSTITUTE processes the personal data within the OS environment of Apple. A link is included on the website with which the person concerned can also communicate with MOTOR LEARNING INSTITUTE via chat. MOTOR LEARNING INSTITUTE uses Intercom's platform to communicate via chat (<https://www.intercom.com/security>).
- personal data: MOTOR LEARNING INSTITUTE will (possibly) receive the following personal data for this purpose:
 - name;
 - sound and visual material;

- e-mail address and therefore (on the basis of the domain name) possibly the organization for which the person concerned works;
- telephone number.

Which personal data MOTOR LEARNING INSTITUTE further processes depends on the information exchanged during the contact.

- purpose: If the person concerned contacts MOTOR LEARNING INSTITUTE, we use personal data to:
 - to maintain contact with the person concerned.
- Ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. If the person concerned contacts MOTOR LEARNING INSTITUTE, we rely on the following grounds:
 - the person concerned gives permission to process personal data, since the initiative to contact the person concerned lies with the person concerned and has control over which personal data is provided to MOTOR LEARNING INSTITUTE during the contact.
- origin: The personal data comes from:
 - the systems used for e-mail, the website and telephony;
 - communication with the person concerned.
- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed. MOTOR LEARNING INSTITUTE does not store sound and visual material of the contact we have had with the person concerned. Conversation data held by Voys B.V. are anonymized after one year.

7. If MOTOR LEARNING INSTITUTE wants to improve its services and bring it to the attention of its relations;

- introduction: MOTOR LEARNING INSTITUTE works continuously to improve its services by adapting them as closely as possible to the needs of the market. We analyze data from previous services, in which personal data are also processed. After MOTOR LEARNING INSTITUTE has adjusted its services, we would like to inform our relations.
- personal data: MOTOR LEARNING INSTITUTE uses for this analysis the various personal data that MOTOR LEARNING INSTITUTE has of the person concerned (such as country, region, language, any purchases/transactions, page visit and duration of page visit).

- purposes: If MOTOR LEARNING INSTITUTE improves its services and we use personal data to:
 - to continue to improve the (of offer) of courses, webinars, presentations, etc.;
 - continuously better tailoring courses, webinars, presentations to existing and/or new target groups;
 - bringing new services to the attention of MOTOR LEARNING INSTITUTE relations.

- ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. When MOTOR LEARNING INSTITUTE provides personal data to defend itself, we rely on the following grounds:
 - MOTOR LEARNING INSTITUTE has a legitimate interest in processing personal data.

- origin: The origin of the personal data can differ greatly. Elsewhere in chapter 4 it is described what the origin of personal data is in various cases.

- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.

8. If MOTOR LEARNING INSTITUTE provides personal data to defend itself

- introduction: MOTOR LEARNING INSTITUTE may be required to provide personal data by virtue of the law, any regulation of a body over which MOTOR LEARNING INSTITUTE is subject, a professional obligation resting on MOTOR LEARNING INSTITUTE or employee or a binding decision of the court or government agency.

- personal data: The situation in which MOTOR LEARNING INSTITUTE defends itself will determine which personal data MOTOR LEARNING INSTITUTE (possibly) processes for this. Of course, MOTOR LEARNING INSTITUTE will do its best to keep this to a minimum.

- purposes: If MOTOR LEARNING INSTITUTE provides personal data to defend itself, we do this to:
 - to be able to defend ourselves (for example during a procedure).

- ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. When MOTOR LEARNING INSTITUTE provides personal data to defend itself, we rely on the following grounds:

- MOTOR LEARNING INSTITUTE has a legitimate interest in processing personal data.
- Origin: The origin of the personal data can differ greatly. Elsewhere in chapter 4 it is described what the origin of personal data is in various cases.
- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.

9. As MOTOR LEARNING INSTITUTE is obliged to provide personal data

- introduction: MOTOR LEARNING INSTITUTE may be required to provide personal data by virtue of the law, any regulation of a body over which MOTOR LEARNING INSTITUTE is subject, a professional obligation resting on MOTOR LEARNING INSTITUTE or employee or a binding decision of the court or government agency.
- personal data: Which personal data is (possibly) involved here, depends on the obligation resting on MOTOR LEARNING INSTITUTE.
- purposes: If MOTOR LEARNING INSTITUTE is obliged to provide personal data, we do this to:
 - with regard to law, regulation, professional obligation or decision.
- Ground: MOTOR LEARNING INSTITUTE processes personal data if this is permitted under relevant laws and regulations. If MOTOR LEARNING INSTITUTE is obliged to provide personal data, we rely on the following grounds:
 - to comply with legal obligations.
- origin: The origin of the personal data can differ greatly. Elsewhere in chapter 4 it is described what the origin of personal data is in various cases.
- retention period: We will not keep personal data for longer than is necessary in connection with the purposes for which the data is processed.

5. Security of personal data

1. MOTOR LEARNING INSTITUTE takes appropriate technical and organizational measures to ensure that personal data is processed lawfully. In concrete terms, this means that:
 - MOTOR LEARNING INSTITUTE only processes your personal data as we have agreed with the person concerned (chapter 4 above);
 - the governance of MOTOR LEARNING INSTITUTE in various places (policies, agreements, conditions, regulations, procedures, ...) pays attention to matters such

as integrity, due care and confidentiality, for example in relation to its employees, (the mentioned in chapter 4 and below) suppliers and our customers.

2. Suppliers are mentioned in a number of places above with whom MOTOR LEARNING INSTITUTE cooperates. These suppliers are again listed below:

- Google LLC en Google Ireland Ltd;
- LinkedIn Corporation;
- Intercom;
- Apple;
- Rimote;

3. For more information about privacy and security at the above suppliers, please visit:

- https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/138._handleiding_privacyvriendelijk_instellen_google_analytics_aug_2018.pdf;
- <https://privacy.google.com/businesses/compliance>;
- <https://policies.google.com/privacy>;
- <https://support.google.com/analytics/answer/2763052>;
- <https://www.linkedin.com/legal/privacy-policy>;
- <https://www.linkedin.com/legal/cookie-policy>;
- <https://www.facebook.com/privacy/explanation/>
- <https://twitter.com/en/privacy>
- <https://help.instagram.com/519522125107875>
- <https://www.intercom.com/legal/privacy>
- <https://www.apple.com/uk/legal/privacy/en-ww/>

6. Your rights

Under the European General Data Protection Regulation you have a number of rights with regard to your data and its processing.

1. MOTOR LEARNING INSTITUTE informs the person concerned of a number of rights that he has in accordance with Section 2 of the GDPR. Please note that these rights are subject to conditions, limitations and exceptions, which make it possible that a request from the person concerned cannot always be executed by MOTOR LEARNING INSTITUTE.

The person concerned can submit a request regarding the following points.

- a. The person concerned has the right to information about the processing of personal data by MOTOR LEARNING INSTITUTE.
- b. The person concerned has the right to inspect the personal data that MOTOR LEARNING INSTITUTE processes.
- c. The person concerned has the right to rectification of incorrect personal data and to completion of incomplete personal data.
- d. The person concerned has the right to erasure of data ('forgetfulness').
- e. The person concerned has the right to limit the processing of his personal data.
- f. The person concerned has the right to transferability ('data portability') of his personal data. MOTOR LEARNING INSTITUTE will provide these in a structured and

