

Privacy Statement - Basker International Childcare

Basker International Childcare B.V. (hereinafter “Basker International Childcare”), located at Jozef Israelsplein 36 2596 AV The Hague, and part of Babilou Family Netherlands B.V., is jointly responsible with Babilou Family Netherlands B.V. for the processing of personal data as outlined in this privacy statement. In this context, personal data refers to any information that can directly or indirectly identify a natural person. If it is necessary to inform you specifically about certain matters, we will do so with reference to this privacy statement.

Categories of individuals

We process the personal data of the following categories of individuals:

- Parents and children who make use of our childcare services.
- Applicants – individuals who are seeking employment or who are actively applying for a position at Basker International Childcare.
- Website visitors – individuals who visit our website <https://www.baskerinternational.nl/>.
- Suppliers and other third parties – individuals from whom we purchase products or services, and other individuals we are in contact with who do not fall under the categories mentioned above.

What data does Basker International Childcare collect?

Basker International Childcare processes your personal data because you use our services and/or because you have provided the data to us yourself. We collect the following personal data in order to perform the placement agreement, to provide our services, and to manage invoicing.

- Parent
 - Title, first and last name
 - Gender
 - Address details
 - Date and place of birth
 - Telephone number
 - Nationality
 - Email address
 - Citizen service number (BSN)
 - IBAN/Bank account number
 - Income details (only if applicable to a VE-placement)
 - Other personal data you have actively provided to us, for example, in correspondence and/or by telephone
- Child
 - First and last name
 - Gender
 - Nationality
 - Address details
 - Date and place of birth
 - Citizen service number (BSN)
 - Child monitoring system (you will receive this when the childcare ends)
 - Health data
 - Biometric data (facial recognition images via the Parent app)
 - Other personal data you have actively provided to us, for example, in correspondence and/or by telephone
- Applicants
 - First and last name
 - Gender

- Address details
- Date and place of birth
- Telephone number
- Email address
- Educational background
- Work experience and other data you have shared with us via your CV
- Other personal data you have actively provided to us, for example, in correspondence and/or by telephone
- Website visitors
 - Communication data (data from the device used to visit the website, such as IP address and software used)
 - Technical data (data for identifying and communicating with website visitors or for recording website traffic statistics)
- Suppliers and other third parties
 - First and last name
 - Gender
 - Address details
 - Telephone number
 - Chamber of Commerce (KvK) number
 - VAT number
 - Email address
 - IBAN/Bank account number
 - Order data
 - In some cases, we may process a certificate of conduct (*Verklaring Omtrent Gedrag – VOG*) and identity card information, if required to comply with applicable laws or regulations.

Other personal data that you have actively provided to us, for example, in correspondence and/or by telephone.

Types of care

In addition, we collect specific information from and about children to tailor the childcare services as closely as possible to their individual needs. This includes, for example, information about allergies, dietary requirements, and vaccination records. We also observe the children's development carefully using our observation system. These types of special category personal data are necessary to ensure the quality of the care and support we provide. We will always seek your explicit consent before processing this type of data.

Processing of the Citizen Service Numbers (BSN)

We process the Citizen Service Number (BSN) of both you and your child to meet legal obligations, such as reporting to the Dutch Tax Authorities in the context of the childcare allowance (kinderopvangtoeslag). All special category personal data, including BSNs, are subject to additional protection at Basker International Childcare. The full BSN is visible only to employees who require access to it in order to perform their duties.

Legal grounds for processing personal data

Of the six legal bases provided under the GDPR, we generally process your personal data based on one of the following four grounds:

- Performance of a contract: If it is necessary for the performance of a contract you have entered into with us, we may process your personal data for that purpose.
- Legal obligation: If processing is necessary for compliance with a legal obligation to which we are subject, we may process your personal data on that basis.
- Legitimate interests: If it is necessary to process your personal data for our legitimate interests (or those of a third party), and those interests are not overridden by your interests or fundamental rights, we may rely on this ground.



- Consent: If none of the above grounds apply, we will only process your data with your freely given, informed, and specific consent.

Sharing personal data with third parties

Basker International Childcare does not sell your data to third parties. We will only share your data with third parties where this is necessary for the performance of our agreement with you, or required to comply with a legal obligation. Where third parties process personal data on our behalf (as processors), we enter into a data processing agreement with them. This ensures that they maintain the same level of security and confidentiality as we do.

In some instances, we are legally obliged to share personal data. For example, providing childcare information to the Tax Authorities as part of legal requirements concerning the childcare allowance. In such cases, we are legally required to cooperate with the relevant authorities and to provide specific personal data. Another example concerns the sharing of personal data if it is necessary to address serious health risks to the individual concerned, such as (suspected) abuse or mistreatment. We may not, and cannot, ignore such situations.

Policy on securing personal data

We have implemented appropriate technical and organisational measures to protect personal data against unlawful processing. These measures include (but are not limited to):

- Personal data is protected from access by individuals who are not authorised to view it. Only individuals who are authorised to access personal data are granted such access.
- All individuals working for or on behalf of Basker International Childcare are subject to a duty of confidentiality regarding all confidential information, including personal data. This obligation is included in the employment contracts of our staff and freelance contractors.
- Our systems are secured through the use of usernames, passwords, and Multi-Factor Authentication (MFA).
- We create secure backups of personal data to enable recovery in the event of physical or technical incidents.
- We do not transfer personal data to parties located outside the European Economic Area (EEA), unless the receiving country ensures an adequate level of data protection, in accordance with applicable legislation.

Personal data retention policy

We do not retain your personal data longer than is strictly necessary. We observe the statutory retention periods for personal data where such periods apply. Where no statutory retention period exists, we apply a maximum retention period of two years following the end of the agreement.

Photos in the Parent app and use of facial recognition

Capturing the development of children through photos and videos is an important part of our educational approach. These visual materials support our childcare professionals in reflecting on and planning for your child's development.

Equally important is the involvement of parents in their child's development. To give parents insight into their child's daily activities, we occasionally share photos and videos. This strengthens the bond between home and Basker International Childcare and fosters collaboration in your child's development.

Naturally, we take the privacy of every child into account. We therefore ask parents for consent before publishing any visual material of their child in the personal Parent app. If consent has not been given for the publication of visual material, any visual material will be made unrecognisable.

To ensure that photos and videos are not visible to parents who have not given their consent, we use automated facial recognition technology. This technology processes biometric data, but does not share any data. It ensures that photos and videos are only shared when individuals who are recognisably depicted have provided explicit consent. This significantly enhances the security of publishing visual material involving employees and/or children,



compared to manual placement. All processing takes place within our secure systems, contributing to the safe and careful handling of visual material.

We request parental consent for the use of this technology.

If a parent/guardian has not given consent for automated facial recognition, identification of individuals in photos and videos will need to be performed manually. The manual handling of such material increases the risk of human error. If a parent/guardian has given consent, photos will be automatically processed in accordance with their preferences, either recognisably or not. This enables us to ensure that photos are always shared with the correct audience, in the correct format (recognisable or not). The use of this technology greatly improves the safety of using photos of children.

If a parent/guardian withdraws consent for publishing visual material in the Parent app, from that moment onward, only material in which the child is unrecognisable will be posted.

Parents also have the option to download visual material that has been published with their consent, for personal use. If parents decide to share this material on their personal social media platforms, this falls outside the responsibility of Basker International Childcare.

Policy on audiovisual material in the press, publicity, and social media

At our childcare locations, photos and videos may occasionally be taken for press purposes, publicity, or internal use. We may also share such content via social media. If children are recognisably depicted, we always request prior written consent from the parents before using such photos.

Parents may download any visual material posted online with consent for their personal use. If parents decide to share this material on their personal social media platforms, this falls outside the responsibility of Basker International Childcare.

Our websites contain links to third-party platforms such as Facebook, YouTube, Instagram, and LinkedIn. These platforms operate independently, and their respective privacy statements apply. We have no control over or responsibility for their data processing activities.

Camera Surveillance

At some of our locations, camera surveillance is used in group areas during opening hours. This is done to comply with the legal obligation related to the 'four-eyes principle' (*vierogenprincipe*). For more information about this principle, please refer to our Health and Safety Policy, which is available at each childcare location. A Data Protection Impact Assessment (DPIA) has been carried out for these locations to ensure the processing of personal data, and its scope and impact, are monitored regularly. Where applicable, signs are displayed on-site to inform visitors of the use of camera surveillance. Parents and staff are also informed about the use of cameras during the introductory meeting.

Additionally, at some locations, camera surveillance is used outdoors. These cameras are active only outside opening hours and are used for security purposes and to protect our property.

Cookies on our website

Cookies are small text files placed on your computer, tablet, smartphone, or other device with internet access. These cookies can be stored and read via your web browser. Once placed, your device can be recognised as long as the same browser is used and the cookie has not been deleted. This allows, for example, easy navigation back to previously visited pages. Functional cookies are essential for the proper functioning of our website. Specifically, they: (i) facilitate communication, or (ii) are strictly necessary for a service requested by the website visitor.

Cookies can also be used to analyse browsing behaviour. Analytical cookies are used to gather information about the quality and effectiveness of a website. We use these cookies to enhance the quality and effectiveness of our



website. We use Google Analytics for this purpose. According to applicable legislation, these analytical cookies are exempt from the cookie consent requirement. Therefore, we do not ask for your consent to use them, but we do inform you about their use.

Rights of data subjects

Data subjects have the right to access, supplement, correct or delete their personal data.

Requests for access or a copy of your personal data will be processed as soon as possible and no later than within four weeks. A reasonable fee may be charged for the provision of a physical or digital copy. Access may be restricted where the rights or significant interests of third parties would be adversely affected by disclosure.

Requests for correction, supplementation, or deletion of personal data will also be processed promptly. An exception applies where data must be retained due to a legal obligation. If your request is refused, we will notify you in writing within four weeks, including the reasons for the refusal.

If you wish to exercise your rights to access, supplement, correct, or transfer your personal data, or to withdraw your consent or object to its processing, you may contact us at: AVG@babelou-family.nl.

To ensure that any request for access, correction, supplementation, or data portability has genuinely been made by you, we may ask additional questions to verify your identity. This is to ensure that we are only disclosing personal data to the correct individual. We aim to respond to your request as soon as possible, and no later than within four weeks.

If we are unable to fulfil your request to access, amend, or delete your personal data, you have the option to submit a complaint via our complaints procedure, which is available on our website. You also have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

Questions

If you have any questions or comments regarding this privacy statement, please contact us at:

AVG@babelou-family.nl

Basker International Childcare
Attn: Data Protection Officer
Iepenhoeve 9b
3438 MR Nieuwegein
030-6047599

