
Privacy Policy Galema Cross Cultural Coaching (Galema CCC)

At Galema CCC we take your privacy seriously and will only use your personal information to provide the products and services you have requested from us, or that you explicitly agreed to receiving from us. In this privacy policy we want to give you clear and transparent information on how we handle any personal data you provide us with.

We will do everything in our power to guarantee your privacy and therefore we handle your personal data with care. Galema CCC complies with EU laws and regulations regarding personal data handling as implied by the General Data Protection Regulation. (GDPR)

- We will collect and use your personal data only for the purpose they have been provided for. Purposes and type of data is described in this privacy policy hereafter.
- We will collect only those data, that are absolutely necessary for the purpose(s) we have collected the data for.
- We will ask your explicit permission for using or storing any personal data, explaining what the purpose of the data collections is.
- If the purpose of the personal data collection has been met, or is no longer in place, we will fully remove and delete any personal data that is stored in any form in our systems.
- At your request, we will remove any personal data from our systems.
- We have taken all possible organizational and technical measures to ensure the security of your personal data.
- We will never provide third parties with your personal data unless sharing your data is essential for providing you with the services for which the data was provided, or -if the data is shared for a different purpose than originally intended- without your explicit permission.
- We are aware of your rights regarding your personal data, we respect these rights and we wish to inform you about these rights.

Galema CCC as an organization is responsible for handling your personal data with great care. If you should have any questions or concerns after reading our Privacy Policy, or any other aspect regarding our organization, please feel free to contact us via the details at the bottom of this document.

Categories of personal data we collect

Client or supplier: company name, contact details such as name, address, city, country, phone number, email address, website, Social Media Profile, bank account details, VAT number.

Purpose: Invoicing, communications and delivery of contracted assignment.

Client (Contact Person or Contractor): participants in (online) training sessions: company name, name, city, country, phone number, email address, function, website, portrait picture (always optional and with explicit permission from individual), Social Media Profile, bank account details, VAT number. Purpose: Delivery of contracted contract Assignment, Invoicing.

Client (participants in Face to Face & online training or coaching): coachees: name, city, country, phone number, email address, company, function, personal information coaching, assessment data, hours of coaching, Skype/Zoom identity, Social Media Profile, LinkedIn profiles, Assessment data, Coaching notes. Purpose: Participation in online and/or Face-to-Face training and/or coaching process.

Prospect, stakeholder/lobby-contacts and interested parties: name, company, phone number, email address. Purpose: Business Development & Coaching Proposals.

Freelance Contractor: name, phone number, email address, banking details, picture, professional background information. LinkedIn profiles. Purpose: delivery of freelance assignments as contracted by Galema CCC

Employee and Freelance staff: name, address, city, country, email address, phone nr. job description, BSN nr. portrait picture, banking details. Purpose: Job contract, payment.

Third parties

The data that you have provided may be handled by third parties only if this is necessary for providing the services as described above.

We use third parties for the following purposes: (please click on the link of the respective companies to view their privacy policies)

- Conducting surveys before, during and after training programs. (SurveyMonkey)
- Trainers and producers hired on a freelance basis. Note: only the individuals actually contracted to deliver (part of) a service such as training or coaching sessions for which your data are being used will be given access to your data. All our freelancers are obliged to sign a data (sub-)processor agreement with us before starting on a project.
- Sharing documents in a cloud based system for the duration of a project (Dropbox and Icloud))
- Hosting webpages (<https://www.yourhosting.nl/over-ons/privacy-policy.html>)
- Online platforms for hosting training sessions (www.skype.com, www.webex.com)
- Surveys for participants (www.ccl.org)
- Handling our financial administration
- We never share personal data with individuals with which we have no processor agreement. We only work with third party companies that are compliant with EU GDPR law and guidelines. We don't hand over your personal data to third parties for other purposes than that which they were collected for, without your explicit permission.

Storage terms

Galema CCC will store your personal data no longer than is absolutely necessary for the purpose these data were provided for, or for which you have given us your explicit permission.

Security

We have taken appropriate organizational and technical measures to ensure the security of your personal data and protect your data from unlawful obtainment or use.

These measures include:

- All persons that act under Galema CCC's responsibility that are in contact with your personal data are kept to a strict secrecy policy regarding your data via a signed contract which includes a secrecy clause.
- The staff or freelancers that have access to your personal data are kept to an absolute minimum; only those that need the access to be able to provide you with the service your data was provided for, have access. Staff or freelancers have no right to use, copy or distribute your data to others.

- All our staff and freelance hired staff are obliged to secure their workstation(s), laptop(s) and phone(s) that have access to your data with a password.
- All our staff and freelance hired staff are bound to use a username and password to login to our systems where personal data is stored.
- The use of and request for personal data is kept to a minimum whenever possible – for example when filling in a survey – this will be kept anonymous unless it is essential to add name and other personal information.
- We have regular cleaning sessions in place where all personal data that is no longer needed for the purpose they were collected for are deleted permanently from all our systems.
- We regularly test and evaluate our security measures.
- Our staff both employees and freelance are well informed on the importance of compliance with the GDPR and are instructed to always treat your personal data with great care.

Your rights with regard to your personal data

We are aware of your rights regarding your personal data, we respect these rights and we wish to inform you about these rights:

- You have the right to know, view, rectify or request the removal of your personal data which we have received from you.
- You have the right to object to or complain about the way your personal data was handled by us or by one of our processors.
- You have the right to let us hand over your personal data as stored by us to yourself or to another party as a direct assignment by you only.
- If you have given us permission to handle your personal data, you are always able to subtract your permission.

Complaints

Should you have a complaint about the way we handle(d) your personal data, please contact us via nelke@galema.eu. We will always do our utmost to find a way to handle your complaint in a friendly and satisfactory manner.

Should a solution not be found, you have the right to file a complaint to the 'Autoriteit Persoonsgegevens' in the Netherlands, the Dutch data protection supervising authority.

Questions

To the best of our abilities, we aim to provide a privacy policy that is clear and transparent. However if you have any questions or concerns regarding our privacy policy, please contact us and we will be happy to help.

Contact Details:

Galema CCC

nelke@galema.eu