



PRIVACY STATEMENT Douglas Ota **Dated May 25, 2018**

Douglas Ota located in The Hague and registered with the Chamber of Commerce under number 27365442 attaches importance to the protection of personal data. This privacy statement explains how Douglas Ota's practice deals with information about an identified or identifiable natural person, as referred to in the General Data Protection Regulation (GDPR, or AVG in Dutch).

1. Application

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

- a. (potential) patients;
- b. visitors to the practice at Boetzelaerlaan 136, The Hague
- c. participants in meetings at the practice
- d. any other person who contacts Douglas Ota or whose personal data he processes.

2. Processing of personal data

Douglas Ota processes personal data that:

- a. was personally provided by the person in question (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;
- b. was requested and received from other care providers or referrers, with the permission of the person concerned;
- c. were acquired by recording, via audio or video or both, for a specific purpose with the consent of the person in question, on the understanding that the material will be destroyed within 4 weeks.

3. Purposes processing

Douglas Ota processes personal data for the following purposes:

- a. the execution of a medical treatment contract and invoicing for work performed;
- b. maintaining contact, invitations for meetings and information requested by the person concerned;
- c. tracking user statistics. User statistics of the website provide information about the number of visitors, the duration of the visit, which parts of the website are being viewed and the click behavior. It concerns generic reports that are not traceable to individual visitors;

4. Legal basis

Douglas Ota processes personal data on the basis of one of the following legal grounds:

- a. consent of the person concerned. This permission can always be withdrawn, without this affecting the lawfulness of the processing on the basis of the permission before the withdrawal;
- b. execution of - or with a view to concluding a medical treatment agreement, including the declaration to third parties, such as the health insurance company and the like;
- c. a legal obligation, such as the obligation to keep a medical record or to register the BSN;
- d. a legitimate interest, such as the use of contact information for an invitation to a meeting.

5. Processors

Douglas Ota may use service providers (processors) to process personal data that process personal data only in accordance with instructions from Douglas Ota. He concludes with processors a processor agreement that meets the requirements of the General Data Protection Regulation (AVG).

6. Share personal data with third parties

Douglas Ota shares personal information with third parties, if this is indicated in the context of the treatment (for example a referral) or if it is necessary to comply with a legal obligation. He does not share personal data with third parties for commercial purposes, unless meetings are organized together with another organization. In that case, only necessary contact information is shared.

7. Transfer outside the EEA

Douglas Ota does not, in principle, transfer personal data to countries outside the European Economic Area (EEA). If this is still necessary, Douglas Ota ensures that the transfer only takes

place if the European Commission has indicated that the country in question offers an adequate level of protection or if there are appropriate safeguards within the meaning of the General Data Protection Regulation (AVG).

8. Storage of data

Douglas Ota does not store personal data longer than necessary. In principle he uses the following retention periods:

- a. medical data: at least 15 years after the end of the treatment agreement;
- b. (financial) administrative data: 7 years after recording the data;
- c. data of employees and freelancers, other than (financial) administrative data: 5 years after termination of employment or after the end of the assignment agreement;
- d. details of applicants: 6 months after completion of the application procedure;
- e. visitors to the website: 5 years after the last visit to the website, unless a previous objection is made in which case destruction will be proceeded.

9. Changes to privacy statement

Douglas Ota can always change this privacy statement. An up-to-date version of the privacy statement is published on its website. 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 Douglas Ota to view, rectify, delete, transfer, limit processing and object to processing. You can contact Douglas Ota by sending an e-mail to info@safepassage.nl.

Also in case of questions or complaints about the way he processes personal data, you can contact Douglas Ota by sending an e-mail to info@safepassage.nl.

Douglas Ota tries to resolve any complaints to all parties satisfaction. If that does not work, you can contact the Dutch Data Protection Authority (AP).