



# Privacy Statement

## Colophon

Contact person	Data protection officer <a href="mailto:privacy@cnv.nl">privacy@cnv.nl</a>
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## **Introduction**

It is important to CNV to handle your personal data with great care. We do so in accordance with privacy laws and regulations, such as the General Data Protection Regulation (GDPR). In this privacy statement, we explain the purposes for which we process personal data, how and which security measures are taken. It also indicates how you can exercise your privacy rights, such as the right to inspect or delete personal data.

By CNV we mean, both CNV Trade Union Federation, CNV Professionals, CNV Youth, CNV Internationaal and CNV Connective. This privacy statement therefore covers all data processed by these parties and the services they offer.

## **Summary**

CNV uses a number of principles when processing personal data and takes measures for reliable, proper and careful handling of personal data.

### **Principles**

For a legal basis and for a purpose: CNV only processes personal data when there is a legal basis for processing them. In doing so, we ensure that personal data is only processed for the purpose for which it was collected.

#### **With as little data as possible**

CNV does not process more personal data than necessary for the purpose of processing. If possible, we process less or no personal data at all.

#### **Keep as long as necessary**

At CNV, we keep your personal data as long as is necessary for the purpose for which it was collected.

### **Measures**

Reliability, integrity and confidentiality: CNV takes measures for reliable, proper and careful handling of personal data. Personal data is appropriately secured. In doing so, we follow the standards of information security. CNV makes agreements on measures with external parties such as software suppliers and data centres. And CNV checks whether external parties comply with these agreements.

## Changes to this privacy statement

From time to time, CNV will need to update this privacy statement due to changed circumstances. So always note the date at the top of this privacy statement and check regularly for a new version.

## What is personal data?

Personal data is data that is **directly** about someone or information which can be traced back to that person. Examples of personal data include names, addresses, telephone numbers and email addresses.

### Special personal data

Some personal data is particularly sensitive because processing it can have a great impact on someone's life. Data that says something about race, religion, political affiliation, union membership or health data are examples of special personal data. These kinds of personal data are protected more by law and may only be processed in situations specified by law. Citizen service numbers [*burgerservicenummer*; *BSM*] are not special personal data, but are considered sensitive. More information on personal data can be found on the [Personal Data Authority](#) website.

## For what purposes may CNV process your personal data?

Based on the GDPR (Section 6(1)), we are obliged to have lawful bases to process personal data. CNV processes your data on the following bases:

- Based on consent;
- Based on an agreement between you and CNV;
- Because CNV must comply with a legal obligation;
- Because CNV serves a legitimate interest.

In addition to bases, we have established processing purposes based on the GDPR (Section 13(1)). These are the reasons/purposes for which we need your personal data. Listed below are the processing purposes for which we use your personal data.

1. Membership administration;
2. Membership advocacy;
3. Legal services;
4. Contribution collection and fees;
5. Provision of newsletters;
6. CNV apps;
7. Communication the means of social media, website, MijnCNV;
8. Cookies through the website.

**Membership administration:** processes the following personal data: name, address details, contact details (email and telephone number), billing address, bank details (Bank Name/IBAN/BIC) and employer information. CNV uses the following reason for these types of personal data: agreement between you and CNV. You register yourself, so you are entitled to a CNV membership through payment of the membership fee. On the basis of this data, your questions and requests about work and income are also handled.

**Membership advocacy:** Membership advocacy includes various services, projects and actions. Services such as, for example, help with tax returns or "try the Union", projects such as, for example, grief counselling, career counselling or actions related to events, actions related to wage increases or collective bargaining. In connection with these activities, personal data is selectively processed, such as name, address details, contact details (email and telephone number), billing address, bank details (Bank Name/IBAN/BIC), salary details, CV and employer information. CNV uses the following reason for these types of personal data: agreement between you and CNV or on the basis of permission.

**Legal services:** CNV provides legal assistance on work and income or private issues. To this end, CNV processes the following personal data: data by the membership administration, legal and employer data, contact data and possibly special personal data such as: membership number and medical data. CNV uses the following reason for these types of personal data: performance of an agreement. You use the paid service of CNV and CNV performs this service.

**Contribution collection and fees:** This financial administration includes the payment of membership fees and the legal administration obligation. For this purpose, CNV processes the following personal data; name, billing address, membership number and bank details (Name bank/IBAN/BIC). An income indication is requested for the calculation of the membership fee. CNV uses the following reason for these types of personal data: legal obligations, including the obligation to keep and retain records, tax obligations and the obligation to draw up annual accounts and annual reports.

**Provision of newsletters and/or mailings:** At CNV, you can sign up as a member and non-member for the digital newsletter. CNV processes the following personal data for this purpose: name and email address. CNV uses the following reason for these types of personal data: consent. You have given explicit permission to receive a digital newsletter.

You may periodically receive mail, such as flyers or certain information, from CNV. We process the following personal data for this purpose: name and address details. CNV uses the following reason for this personal data: consent. You have given permission to receive mail from CNV.

If the newsletter or mailing is directly related to the services or products, projects or actions of CNV, these newsletters or mailings fall under the basis of justified interest.

**CNV apps:** CNV has several apps you can use. These apps process the following personal data: device used to use the app, membership data (only when logging in) and location.

CNV uses the following reason for this personal data: consent. By downloading the app, logging in or explicitly giving access to your GPS location, you give CNV permission to view this data.

**Communication by means of social media, website, MijnCNV [MyCNV]:** When filling in the contact form on the website or responding on social media, CNV processes the following data for members and non-members: name, email, address details, telephone number, with which union you are a member.

CNV uses the following reason for these types of personal data: legitimate interest to be able to communicate with you, to handle and follow up on the questions, complaints or requests you have sent via the contact form.

**Cookies, placed through the websites:** Through cookies, CNV collects, among other things, but not always, the following personal data: IP address, statistical and aggregated data on surfing behaviour and website visits (including scrolling and clicking behaviour). CNV uses the following reason for this personal data: permission for the use of certain cookies, via the cookie banner on the website.

You can always opt out of these cookies via the page <https://www.cnv.nl/cookies>. Here you will also find more information about the use of cookies on the CNV website.

Although visitors of all ages can visit CNV website, CNV does not want to collect personal data from children under 16 years of age without the consent of the parent/guardian. Children 16 years of age or younger may only use the CNV website under the supervision of your parent/guardian.

## Retention periods

CNV never keeps your data longer than necessary. In any case, your data will be stored for as long as you are a CNV member.

The retention periods for personal data can be described in different types of personal data, i.e.:

- Financial personal data intended for administration;
- Personal data intended for legal proceedings;
- Other types of personal data.

## Provision of personal data to third parties

CNV only provides personal data to third parties if this is necessary to realise the purpose of the processing or to comply with a legal obligation.

With companies that process your data on behalf of CNV, CNV enters into a processing agreement to ensure the same level of security and confidentiality of your data. CNV remains responsible for such processing at all times.

It is possible that your personal data may be transferred to third parties located outside the European Economic Area (EEA). CNV only transfers your personal data outside the EEA when this is necessary for the use of a particular third-party service. Because regulations in the privacy protection may not offer the same protection as within the EEA, CNV will ensure that in these cases appropriate measures are taken to protect your personal data in accordance with applicable law.

CNV does not sell your data to third parties.

## Security

Personal data, both digital and physical, are always strictly secured. CNV takes strict measures to protect your personal data. For example, our devices are secured with a password and/or fingerprint scan and/or facial recognition. We use 2-step verification.

This includes devices such as (mobile) phones, laptops, tablets and computers. For website or digital transmitted data, CNV uses firewalls, secure SSL, VPN connection and virus scanners. Personal data is backed up periodically. Naturally, the backups do not include data whose retention period has expired. Physical data is always kept in a locked room. Premises used by CNV are protected by appropriate security measures.

If you feel that your data is not properly secured or there are indications of abuse, please contact us via [privacy@cnv.nl](mailto:privacy@cnv.nl).

## Does CNV apply forms of 'profiling'?

Profiling involves organisations profiling people by collecting, analysing and combining all kinds of data from them. CNV does not apply profiling.

## Your rights regarding personal data

You are the owner of your personal data. You have the following rights under the GDPR:

1. **Right of inspection (Article 15 GDPR):** you always have the right to inspect the personal data processed, stored and used by CNV.
2. **Right to rectification (Article 16 GDPR):** Is the personal data stored by CNV incorrect? Then you can amend it (or have it amended).
3. **Right to transfer data (Article 20 GDPR):** You can have CNV transfer your personal data to a party offering similar services. Think for example of another trade union.

4. **Right to erasure of data (Article 17 GDPR):** You can send CNV a request to have your personal data erased. You can do this on the basis of the right to oblivion.
5. **Right to stop data use, objection (Article 21 GDPR):** You always have the right to object to data processing.
6. **Withdrawal of consent:** You have this right insofar as we process your personal data on the basis of your consent. You always have the right to withdraw the given consent. This has no consequences for the past, but does mean that we are then no longer allowed to process that data. As a result, CNV may no longer be able to perform certain services.

## Would you like to exercise the above rights?

We are required by law to verify your identity. You have the right to submit the above (1-6) requests to CNV. You can use [info@cnv.nl](mailto:info@cnv.nl) or [privacy@cnv.nl](mailto:privacy@cnv.nl) to send the request.

To make sure that the request is made by you, we ask you to send a copy of your ID with the request. In this copy, strike through in black the passport photo, the strip with numbers at the bottom of the document, the document number and Citizen Service Number (BSN). Write on the copy what you are using it for, for example: CNV request for inspection and date. This way, the copy will not be reused and your privacy will be even better protected. You can also use the '**KopieID**' app developed by the government for this purpose. We will respond to your request within 4 weeks.

## Contact details

Do you have general questions or are you not satisfied with how CNV handles your personal data? Then please contact the Data Protection Officer. You can submit your questions or complaint digitally or on paper to: [privacy@cnv.nl](mailto:privacy@cnv.nl) or

Tiberdreef 4  
3561 GG Utrecht

PO Box 2475  
3500 GL Utrecht

Are you not satisfied with the handling of your complaint? Then you can take your complaint to the Personal Data Protection Authority (PDPA).

### **Data Protection Officer**

CNV has a Data Protection Officer (DPO). The DPO is independent and checks whether CNV applies and complies with the rules of the General Data Protection Regulation (GDPR). If you have a complaint about the way CNV handles personal data, please contact the DPO: [privacy@cnv.nl](mailto:privacy@cnv.nl).

### **Personal Data Authority**

The Personal Data Authority supervises compliance with privacy legislation externally. You have the right to file a complaint about CNV with the national authority.