



# Privacy Policy

## 1. Introduction

Welcome to Return Well. We are committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information in compliance with the General Data Protection Regulation (GDPR).

## 2. Data Controller

Return Well is the data controller responsible for your personal data. We are registered with the Dutch Chamber of Commerce under the number KVK88985482. Our registered office is located at Tolhek 62, IJsselmuiden, The Netherlands. For any questions regarding this Privacy Policy, please contact us at [dickelisa\(at\)returnwell.nl](mailto:dickelisa@returnwell.nl).

## 3. Data Collection

We may collect and process the following types of personal data:

- **Identity Data:** First name, last name, title.
- **Contact Data:** Email address, phone number, postal address.
- **Financial Data:** Payment details for donations and services.
- **Transaction Data:** Details about donations and payments to and from you.
- **Technical Data:** IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- **Profile Data:** Username, password, interests, preferences, feedback, and survey responses.
- **Usage Data:** Information about how you use our website, products, and services.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.
- **Other Data:** Any additional information you provide to us directly or indirectly through our website or services.

## 4. How We Use Your Data

We will use your personal data only when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To Provide Services:** Including activities, training programs, sessions and other services.
- **To Manage Our Relationship:** Notifying you about changes to our terms or privacy policy.
- **To Administer Our Organization:** Protecting our operations and this website.
- **To Improve Our Services:** Using data analytics to improve our website, products/services, marketing, customer relationships, and experiences.
- **To Market to You:** Making suggestions and recommendations about services that may be of interest to you.
- **To Comply with Legal Obligations:** Ensuring compliance with applicable laws and



regulations.

## 5. Legal Basis for Processing

We will process your personal data under the following legal bases:

- **Consent:** You have given clear consent for us to process your personal data for a specific purpose.
- **Contract:** Processing is necessary for a contract we have with you or because you have asked us to take specific steps before entering into a contract.
- **Legal Obligation:** Processing is necessary for us to comply with the law.
- **Legitimate Interests:** Processing is necessary for our legitimate interests or the legitimate interests of a third party, provided your interests and fundamental rights do not override those interests.

## 6. Data Sharing

We may share your personal data with the following third parties:

- **Service Providers:** IT and system administration services.
- **Professional Advisers:** Lawyers, bankers, auditors, and insurers.
- **Regulatory Authorities:** Regulators and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not sell personal data to third parties.

## 7. International Transfers

If we transfer your personal data outside the European Economic Area (EEA), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- **Transfer to countries** that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- **Use of specific contracts** approved by the European Commission which give personal data the same protection it has in Europe.
- **Transfer to the US** if the recipient is part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

## 8. Data Security

We have implemented technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, alteration, and destruction. Access to your personal data is limited to those employees, agents, contractors, and other third parties who have a business need to know.



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## 9. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data longer in case of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## 10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

## 11. Automated Decision-Making

We do not engage in automated decision-making, including profiling, that has a legal or similarly significant effect on you.

## 12. Cookies and Similar Technologies

We use cookies and similar technologies to collect information about your use of our website. This helps us improve your experience when you browse our website and allows us to make improvements.

### Cookie Statement

Return Well uses technical and functional cookies. Cookies are small text files sent by visiting a website to make the user experiences of visitors more efficient. According to the law, Return Well may store cookies on your device if these cookies are strictly necessary for the website's operation. For other types of cookies, your consent is required. We recommend accepting cookies to enhance the user-friendliness of the website. Visitors to the website have the option to check in.

The cookies used by Return Well are functional cookies, which ensure the proper functioning of the website. These cookies do not affect personal privacy, so no consent needs to be requested or given. For example, these cookies save your browser settings so that our website can be viewed optimally, ensure the website remains accessible (load balancing), and include no-follow cookies that prevent other cookies from being placed.

Return Well's website also uses cookies from Google for Google Analytics. We do not track your internet activities. Google Analytics may be required by applicable laws and regulations to



provide access to this data. As a result, Return Well cannot link this information to an individual. If you have any questions, you can contact us at [dickelisa\(at\)returnwell.nl](mailto:dickelisa@returnwell.nl).

## Use of Social Media

Return Well uses third-party cookies to optimize the website. Some cookies are placed by third-party services displayed on the website. These third parties include Google Analytics and social media platforms (Facebook, Twitter, and LinkedIn). The privacy and cookie policies of the respective companies apply to the use of cookies from these third parties. When you click the Social Media button on the website, a Social Media cookie is placed. This allows the Social Media party to recognize your IP address when you share an article from the website. For the cookies used by Social Media parties and the data and/or personal information they collect, Return Well refers you to the privacy and cookie statements of these parties.

## Browser Settings

If you do not want websites to place cookies on your device while you are viewing the website, you can adjust your browser settings. Before a cookie is placed, you will receive a warning and you must give permission for the cookie. If you do not, this may, for example, result in the website working less effectively. You can adjust your browser settings so that your browser refuses all cookies, including third-party cookies. You can also delete cookies that have already been placed. To do this, you need to change your browser settings via preferences and then adjust the privacy settings.

## Third-Party Websites

This privacy statement does not apply to third-party websites that are linked to this website. We cannot guarantee that these third parties handle your personal data in a reliable or secure manner. We recommend that you read the privacy statement of these websites before using them.

## Compliance with International and Dutch Law

This document is designed to comply with international and Dutch law, including the GDPR. As required by the GDPR, we:

1. **Obtain Consent:** Before placing cookies, we will obtain your explicit consent.
2. **Provide Transparency:** We clearly inform you about the types of cookies used, the purposes for which data is collected, and the third parties involved.
3. **Allow Opt-Out:** You can refuse cookies through your browser settings and still use our website, though functionality may be limited.
4. **Refer to Third-Party Policies:** We direct you to the privacy policies of third-party services for details on their cookie usage and data handling practices.

## 13. Disclaimer

By using our website, you agree to our disclaimer. We reserve the right to change the content of our website and this disclaimer at any time without notifying users. The content of our website has been compiled with the greatest possible care, but it may still contain inaccuracies or be incomplete. We accept no liability for any damage arising from the use of our website.



## 14. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

## 15. Contact Us and Filing complaints

For questions, remarks, or complaints regarding data processing, contact us at:

### **Return Well**

Tolhek 62, IJsselmuiden, The Netherlands

Phone: +31 611916792

Email: [dickelisa\(at\)returnwell.nl](mailto:dickelisa@returnwell.nl)

Additionally, you have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) via [this link](#).

*Return Well* is a self employed small business, registered in the Netherlands.

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