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compliance and assurance**

## **Privacy Policy 2026**

<b>Data Controller</b>	't Web Holding B.V. and all affiliated entities (see art. 1)
<b>Version</b>	01.2026

## Article 1 - Identity and Scope

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### 1.1 Data Controller(n)

This privacy policy applies to all processing of personal data by or on behalf of the following legal entities:

- 't Web Holding B.V.
- 't Web Opleidingen en Adviezen
- 't Web Bedrijfsopleidingen B.V.
- 't Web Intern Transport B.V.
- 't Web Opleidingen V.O.F.
- 't Web O.G. B.V.
- 't Web Vakopleidingen V.O.F.
- All other legal entities established or yet to be established by 't Web.

Zeppelinstraat 7, 7903 BR Hoogeveen | Tel.: 0528 280 888 | E-mail: [info@tweb.nl](mailto:info@tweb.nl)

### 1.2 Data Protection Officer (DPO)

't Web has appointed a Data Protection Officer in accordance with Article 37 AVG. The DPO is reachable via [n.martens@tweb.nl](mailto:n.martens@tweb.nl), supervises compliance with this policy and is the central point of contact for data subjects and the Dutch Data Protection Authority.

### 1.3 Scope

This policy applies to all employees, contractors and interns, to all systems and processes in which personal data are processed, and to all processors acting on behalf of 't Web.

## Article 2 - Principles and Legal Bases (AVG art. 5 and 6)

### 2.1 Principles of Processing (art. 5 AVG)

- Lawfulness, fairness and transparency towards the data subject (para. 1 sub a);
- Purpose limitation: no processing for incompatible purposes (para. 1 sub b);
- Data minimisation: only data that is necessary for the purpose (para. 1 sub c);
- Accuracy: inaccurate data are corrected or erased without delay (para. 1 sub d);
- Storage limitation: not retained longer than necessary (para. 1 sub e);
- Integrity and confidentiality: appropriate technical and organisational security (para. 1 sub f);
- Accountability: demonstrable compliance with all principles (para. 2).

## 2.2 Legal Bases for Processing

Processing takes place exclusively on the basis of one of the following legal grounds (art. 6 AVG):

- Consent of the data subject (para. 1 sub a) – explicitly, freely, specifically and demonstrably recorded;
- Processing necessary for the performance of a contract (para. 1 sub b);
- Necessary to comply with a legal obligation (para. 1 sub c);
- Necessary to protect vital interests (para. 1 sub d);
- Public interest or exercise of official authority (para. 1 sub e);
- Legitimate interest of the controller or a third party (para. 1 sub f) – following a documented legitimate interest assessment (LIA).

## Article 3 - Processing Activities and Purposes

### 3.1 Records of Processing Activities (art. 30 AVG)

't Web maintains an internal record of processing activities in accordance with Article 30 AVG.

Overview of the main processing activities:

Processing Activity	Purpose	Legal Basis (AVG)	Retention Period
Course/training enrolment	Performance of contract, certification	Art. 6 para. 1 sub b	7 years (fiscal)
Customer and relationship management (CRM)	Service delivery, communication	Art. 6 para. 1 sub b	5 years after last contact
Personnel administration	HR, payroll, legal obligations	Art. 6 para. 1 b and c	7 years after termination of employment
Newsletter and marketing	Commercial communication	Art. 6 para. 1 sub a – consent	Until withdrawal of consent
Website visits/cookies	Analytics, optimisation	Art. 6 para. 1 sub a/f	Max. 13 months
Grant and financing applications	Legal obligation	Art. 6 para. 1 sub c	10 years
Security and incident management	Security, fraud prevention	Art. 6 para. 1 sub f	1 year after closure

*The complete record of processing activities is available from the DPO and can be disclosed to the DPA upon request.*

## Article 4 - Special Categories of Personal Data

't Web does not in principle process special categories of personal data (art. 9 AVG). Exceptions are only permitted on the basis of:

- Explicit consent of the data subject (para. 2 sub a);
- Necessary for the performance of obligations in the field of employment law or social security (para. 2 sub b);
- Establishment, exercise or substantiation of a legal claim (para. 2 sub f).

Citizen Service Numbers (BSN) are only processed in accordance with the Dutch AVG Implementation Act (UAVG), with strict access restrictions and audit logging.

## Article 5 - Retention Periods and Secure Deletion

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't Web maintains a documented retention policy. Data are securely deleted or anonymised after the retention period expires, in accordance with procedure PRO-DD-001.

- Financial/tax administration: 7 years (art. 52 Dutch General Tax Act);
- Employment contracts and payroll administration: 7 years;
- Subsidiedocumentatie: 10 years of conform subsidieregeling;
- Security logs: minimum 1 year, maximum 3 years;
- Marketing consent: until withdrawal – deleted immediately thereafter.

## Article 6 - Information Security (ISO 27001/27002, ISO 27018)

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### 6.1 Technical Measures

- Encryption at rest and in transit via TLS 1.2 or higher;
- Pseudonymisation where technically and organisationally feasible;
- Multi-factor authentication (MFA) for access to systems containing personal data;
- Access management based on least-privilege and need-to-know principles;
- Regular penetration tests and vulnerability scans (at least annually);

### 6.2 Organisational Measures

- Confidentiality agreements for all employees and contractors;
- Mandatory AVG awareness training upon onboarding and annual refresher module;
- Clean desk and clear screen policy;
- Access management procedure for onboarding and offboarding;

## Article 7 - Processors and Transfers Outside the EEA

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### 7.1 Data Processing Agreements (art. 28 AVG)

Written data processing agreements are concluded with all processors, containing at minimum: a description of the processing, security obligations, audit rights, confidentiality, prohibition on unauthorised sub-processors and an obligation to report data breaches within 24 hours.

### 7.2 Transfers Outside the EEA

Transfer outside the EEA is only permitted on the basis of:

- Adequacy decisions by the European Commission (art. 45 AVG);
- Passende waarborgen (art. 46 AVG), zoals een modelcontract, een gedragscode, certificering, goedgekeurde standaardcontractbepalingen (SCC's) of bindende bedrijfsvoorschriften (BCR);
- Specific derogations (art. 49 AVG).

An up-to-date list of (sub-)processors including processing location is available from the DPO.

## Article 8 - Rights of Data Subjects (AVG art. 15-22)

Right	Explanation and Implementation
<b>Access (art. 15)</b>	The data subject may submit an access request free of charge. We respond within one month. If the request is complex, this period may be extended by up to two months. The data subject will be informed within one month.
<b>Rectification (art. 16)</b>	The data subject has the right to have inaccurate personal data corrected and incomplete personal data completed, without undue delay.
<b>Erasure/right to be forgotten (art. 17)</b>	The data subject has the right to have personal data erased where a legal ground for this exists. Erasure may be refused where a statutory retention obligation or other legal ground applies.
<b>Restriction of processing (art. 18)</b>	The data subject may request restriction of processing where the accuracy of the data is contested, the processing is unlawful, the data are needed for a legal claim, or where an objection has been lodged against the processing.
<b>Data portability (art. 20)</b>	The data subject has the right to receive personal data in a structured, commonly used and machine-readable format (e.g. CSV and JSON), so that it can be transferred to another controller or organisation without hindrance.
<b>Objection (art. 21)</b>	The data subject may object to the processing of personal data where it is based on legitimate interest or a task in the public interest. In addition, an objection may always be lodged against processing for direct marketing purposes.
<b>Automated decision-making (art. 22)</b>	The data subject has the right not to be subject to solely automated decision-making with legal or similarly significant effects, unless this is necessary for a contract, legally permitted, or the data subject has given explicit consent.
<b>Withdrawal of consent (art. 7 para. 3)</b>	The data subject has the right to withdraw consent at any time where processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing prior to the withdrawal.

Requests can be submitted via [n.martens@tweb.nl](mailto:n.martens@tweb.nl) or by post addressed to the DPO. Identity verification will take place before the request is processed.

## Article 9 - Data Breaches and Incident Management (art. 33-34 AVG)

### 9.1 Internal Registration

All suspected data breaches are reported to the DPO without delay and recorded in the data breach register.

## 9.2 Notification to the DPA (art. 33 AVG)

Where a data breach is likely to result in a risk to the rights and freedoms of data subjects, this is reported to the competent supervisory authority without undue delay and, where feasible, within 72 hours. The notification includes: the nature of the breach, the categories and numbers of data subjects and records concerned, the contact details of the DPO, the likely consequences and the measures taken to address the breach.

## 9.3 Communication to Data Subjects (art. 34 AVG)

Where a data breach is likely to result in a high risk to the rights and freedoms of data subjects, they will be informed without undue delay in plain language. The procedure is set out in PRO-DL-001.

## Article 10 - Cookies and Online Tracking

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The websites of 't Web use three categories of cookies:

- Functional/necessary cookies: required for the operation of the website; no consent required;
- Analytical cookies (anonymised): insight into website usage; explicit consent required in accordance with DPA guidelines;
- Marketing/tracking cookies: personalised communication; only after explicit opt-in consent.

A cookie banner is displayed on the first visit. Consent is logged via a consent management platform and can be withdrawn at any time. Analytical cookies are retained for a maximum of 13 months.

## Article 11 - Privacy by Design and Privacy by Default (art. 25 AVG)

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't Web applies Privacy by Design and Privacy by Default to all new products, services and processes:

- Default settings are maximally privacy-friendly: minimal data collection, shortest retention periods;
- New suppliers undergo a vendor risk assessment for AVG compliance prior to onboarding;
- Changes to processing activities are assessed for the need to conduct a full DPIA.

## Article 12 – Data Protection Impact Assessment (art. 35 AVG)

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For processing activities with a high privacy risk, 't Web carries out a DPIA. This is required at least in the following cases:

- Systematic and extensive evaluation of personal aspects of individuals, including profiling, with legal or similarly significant effects on the data subject;
- Large-scale processing of special categories of personal data;
- Systematic monitoring of publicly accessible areas on a large scale;
- Processing involving new technologies that is likely to result in a high risk to the rights and freedoms of data subjects;
- Processing activities that appear on the DPA's list of processing for which a DPIA is mandatory.

DPIA reports are retained and periodically reviewed. Where a high residual risk remains after mitigation, the DPA is consulted in advance in accordance with art. 36 AVG.

## Article 13 - Transparency and Communication (art. 13-14 AVG)

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't Web informs data subjects in a transparent and comprehensible manner about the processing of their personal data, in accordance with Articles 13 and 14 AVG. This information is provided at the time of collecting the personal data or, where the data were not obtained directly from the data subject, within a reasonable period thereafter. The information is made available via privacy statements, opt-in texts, contracts and via [www.tweb.nl/privacy](http://www.tweb.nl/privacy).

## Article 14 - Implementation, Enforcement and Training

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### 14.1 Internal Communication and Implementation

This policy has been communicated internally via the employee intranet and is included in the staff handbook and employment contracts. Employees complete a mandatory AVG awareness training upon onboarding and participate in annual refresher modules. In doing so, 't Web fulfils the organisational measures and accountability obligations as intended by the AVG.

### 14.2 Documented Procedures

- PRO-DL-001: Data Breach Procedure
- PRO-VW-001: Management of Data Processing Agreements
- PRO-CO-001: Cookie Management and Consent Management

### 14.3 Enforcement

Violation of this policy may result in disciplinary measures. Serious or structural violations are reported to the DPO and, where necessary, to the DPA.

## Article 15 - Complaints and Supervision

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Data subjects with a complaint may:

- Contact us in writing via [info@tweb.nl](mailto:info@tweb.nl)
- Take legal action before the competent court.

't Web handles complaints within 4 weeks and always provides a written, reasoned response.

## Article 16 - Amendments and Version Control

This privacy policy is reviewed at least annually. Material changes are communicated via the website and by email.

Version	Date	Description
01.2018	16-02-2018	Initial version
<b>01.2026</b>	<b>February 2026</b>	<b>Full revision: AVG compliance, DPO appointment, records of processing art. 30, DPIA procedure, ISO 27001/27002/27018, NOREA/CoBIT integration, expanded data subject rights, cookie policy, data breach procedure, documented procedures PRO-DD/DL/BR/VW/CO/DP/AU.</b>

## Contact Details

<b>Organisation</b>	't Web (alle gelieerde entiteiten)
<b>Address</b>	Zeppelinstraat 7, 7903 BR Hoogeveen
<b>Telephone</b>	0528 280 888
<b>General email</b>	info@tweb.nl
<b>Privacy website</b>	www.tweb.nl/privacy
<b>Dutch Data Protection Authority</b>	www.autoriteitpersoonsgegevens.nl   0900 2001 201