

# PRIVACYSTATEMENT BEST PRACTICE

Best Practice, established in Rotterdam and registered with the Chamber of Commerce under number 50872427, highly values the protection of personal data. This privacy statement explains how Best Practice deals with information about identified or identifiable natural persons, as referred to in the General Data Protection Regulation (GDPR).

## 1. Application

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

- a. (potential) patients;
- b. visitors to the practice of Best Practice;
- c. visitors to [www.praktijkbestpractice.nl](http://www.praktijkbestpractice.nl);
- d. participants in meetings of Best Practice;
- e. applicants;
- f. all other persons who contact Best Practice or of whom Best Practice processes personal data, with the exception of its employees.

## 2. Processing of personal data

Best Practice processes personal data:

- a. personally provided by the person concerned (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. that was obtained from third parties, such as other healthcare professionals;
- c. that was generated during a visit by a person concerned to the website of Best Practice, such as IP address, the surfing behavior on the website (such as data of the first visit, previous visit and current visit, pages accessed and the way in which the website was navigated) and items clicked by the person concerned;
- d. that are necessary in the context of therapeutic treatment, such as video recordings, audio recordings, questionnaire-based research, or e-health applications.

## 3. Purposes processing

Best Practice will process personal data for the following purposes:

- a. the execution of medical treatment contracts and invoicing of services performed;
- b. protecting the vital interests of the person concerned or another natural person."
- c. maintaining contact, invitations for meetings and information requested by the person concerned;
- d. tracking user statistics. User statistics of the website provide information about the number of visitors, the duration of their visits, which parts of the website are accessed and the click behavior. It concerns generic reports that are non-personally identifiable;
- e. monitoring access to practice and protecting confidential data.

#### **4. Legal basis**

Best Practice 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, but withdrawal will not affect the lawfulness of the processing on the basis of the permission before the withdrawal;
- b. execution of or with a view to the conclusion of medical treatment agreements, including invoicing to third parties, such as the health insurance company and the like;
- c. legal obligations, such as the obligation to keep medical records or to register BSNs;
- d. a legitimate interest, such as the use of contact information for sending invitations for a meeting.

#### **5. Processors**

Best Practice may use service providers (processors) for the processing of personal data who will only process personal data according to instructions from Best Practice. Best Practice will conclude a processor agreement with processors that meets the requirements of the General Data Protection Regulation (GDPR/AVG).

#### **6. Share personal data with third parties**

Best Practice do not share personal data with third parties without the consent of the person concerned, except when it is necessary for the execution of the treatment agreement or the management of the professional practice, or when required to fulfill a legal obligation. This includes sharing data with the health insurer and the Dutch Healthcare Authority, or allowing access to the file by a BIG-registered professional bound by professional secrecy for the purpose of quality audits. Explicit written consent from the patient is not required for the latter. However, the patient does have the opportunity to object to the use of their data for quality purposes. The patient will be informed in advance of the possibility of their data being used for these quality purposes. Best Practice does not share personal data with third parties for commercial purposes unless events are organized jointly with another organization. In such cases, only necessary contact information is shared. Bovenkant formulier

#### **7. Transfer outside the EEA**

Best Practice does not, in principle, transfer personal data to countries outside the European Economic Area (EEA). If this should nevertheless be necessary, Best Practice ensures that the transfer will only take place if the European Commission has indicated that the relevant country provides an adequate level of protection or if there are appropriate safeguards within the meaning of the General Data Protection Regulation (GDPR/AVG).

#### **8. Storage of data**

Best Practice will not store any personal data longer than necessary. In principle Best Practice will use the following retention periods:

- a. medical data: at least 20 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: 4 weeks after completion of the application procedure;
- e. visitors to the website: 5 years after the last visit to the website, unless an objection is made in which case the data will be deleted.

## **9. Changes to privacy statement**

Best Practice may change this privacy statement at any time. An up-to-date version of the privacy statement will be published on the website of Best Practice. 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 Best Practice to view, rectify, delete, transfer, limit processing and to object to processing. You can contact Best Practice by sending an e-mail message to [info@praktijkbestpractice.nl](mailto:info@praktijkbestpractice.nl).

For questions or complaints about the way in which [member LVVP] processes personal data, you can also contact Best Practice by sending an e-mail message to [info@praktijkbestpractice.nl](mailto:info@praktijkbestpractice.nl). We will try to resolve complaints satisfactorily. If no satisfactory solution is reached, you can contact the Dutch Data Protection Authority (AP).