

# UvA Talen B.V. privacy and cookie statement

UvA Talen B.V. (hereinafter referred to as: UvA Talen) values your privacy and complies with the requirements of the General Data Protection Regulation. This means that we:

- **Clearly state the purpose** before we process your personal data via this privacy and cookie statement;
- **Collect as little personal data as possible**, and only such data as are necessary for our purposes;
- **Explicitly ask your consent** for us to process your personal data, where such consent is mandatory;
- **Take the necessary security measures** to protect your personal data. We also demand this obligation of any parties who process personal data for us;
- **Respect your rights**, such as the right to access, correct or delete any of your personal data processed by us.

This privacy and cookie statement applies to our offline services and to our websites:

- <https://www.uvatalen.nl/en>
- <https://www.thelanguageacademy.nl/en>
- <http://vve.uvatalen.nl/login.php>

This privacy and cookie statement also applies to personal data collected within the context of our offline services. Your personal data are safe with us and we will always treat these with due care. This privacy and cookie statement explains exactly what we do with any information we collect about you. We may amend this privacy and cookie statement at any time, so we advise you to consult it regularly for any changes. In the event of any major changes, we will inform you of this, for example through an announcement on our website, via an email, or by asking you to renew your consent.

This privacy and cookie statement was last amended on 24 June 2022.

If you have any questions or would like to know precisely what personal data we hold on you, please contact us using the contact details at the end of this statement.

## The purpose for which we may use your data

When you use our website or our services, we collect certain data from you. This may include personal data. The personal data we collect from you can be used for the following purposes:

- To make Contact;
- To draw up a Quote;
- To provide Translation services;
- To provide Language courses;
- To show Ratings;
- To recruit and select new employees during a Job application procedure;
- To publish our Website;
- Use of cookies.

We will not use your personal data for any other purpose without your prior consent, or if we are permitted or obliged to do so by law.

## The types of personal data that we use

We may use the following personal data for the purposes indicated above:

- Name and address details;
- Date and place of birth;
- Contact details;
- Payment details;
- Test results;
- Log-in details;
- Business details;
- Delivery address;
- Invoice address;
- Salutation;
- Job application details (CV, cover letter and any references given);
- Search behaviour;
- Geographical details;
- Age category;
- Cookie ID;
- IP address;
- How you found us;
- Personal data that you fill in in our contact forms.

We do not always use all the information you supply. This use is often limited to some of the types of data described above. Which of your details we collect and use depends on the purpose for which we are processing the data.

#### **Why we are permitted to use your personal data**

There are a number of principles on the basis of which we are permitted to use your information; for example, we may use your personal data because:

- We have asked your consent to do so. You may withdraw your consent for this at any time;
- It is necessary for us to be able to fulfil an agreement we have made with you (such as providing you with a service). Or as preparation for making an agreement (for example in a job application);
- It is necessary for representing our legitimate interests. In this case, we will first carefully consider whether our legitimate interests truly outweigh your privacy interests, we inform you of this via this privacy and cookie statement and we also offer you the right to object;
- It is necessary for us to be able to fulfil our legal obligations.

Below is an overview of our forms of service with a specification of the data we process for each purpose and the specific principle that allows or obliges us to do so.

#### **Contact**

The purpose of the [contact form](#) is for you to ask us to contact you. For this we use your name, your company name (optional), your contact details, the desired date of contact and the reason for seeking contact. We use these data to contact you at your request and to provide the desired service.

#### **Quote**

Our quotation request forms are to enable you to quickly and easily request a quote for our language services. To be able to send you a quote we need your name, your company name (if applicable), your address (optional), salutation, contact details, information about the service required, how you found us (optional) and we also provide a number of empty fields for additional information. We use your information to carry out preparations for an agreement, namely to properly process your request for a quote.

## **Translation services**

Services provided by our translation services department include translating and editing documents, copywriting and interpreting. We retain our translations indefinitely, in order to improve our translation expertise and to ensure continuity and consistency to our customers with regard to writing style and quality. On account of the indefinite retention period, documents for translation should not contain personal data. Should you choose despite this to have documents translated by us that contain personal data, it is your responsibility to ensure that this is in line with the applicable legislation. We can of course delete or anonymise the document(s) in question upon request (with the exception of sworn translations).

## **Language courses**

### **1. Group courses (online and offline)**

UvA Talen offers a range of group courses that you can enrol for online. For you to be able to participate in the group courses, we need the following personal data from you: Name and address details, contact details, date and place of birth, invoice details, and whether you are a student or UvA employee/member of Alumni Association AUV. We also collect data during the group courses. We use these data to carry out the agreement made with you concerning the group course and to present you with a certificate at the end of the course. We retain invoice details for as long as we are obliged to do so on the basis of our statutory obligation (for tax purposes). For example, we are required by law to retain our tax administration for seven years, and in some cases for ten years.

- **No-obligations online language test**

You can take a free, no-obligations language test on our website to determine your present language level in English, Dutch, Spanish or French. Once the test is complete, you will see an estimation of your present language level on the screen. We are able to see how many people have taken the test, but we do not collect any personal data from the test.

- **Intake test (online and offline)**

Once we have received your enrolment, we will send you an online test with your login details. The results of this test will be stored on our website and in our Customer Relations Management (CRM) system so that we can share it with the teacher who will be doing your telephone intake interview. After the intake procedure, we will share this information with you and advise you on your language level and which course is most suitable for you.

- **Information, course information and final results**

We retain the results of students' final tests, resits, and certificates in our CRM system. Tests are retained for one year for inspection. We also keep email contacts, final confirmations and attendance lists for as long as we need them.

### **2. Corporate language courses**

We also offer corporate language courses (in-house if required) for company employees. These may be individual or group courses. For these courses, we need the following details from the contact: company details, name and contact details. We use these data to carry out the agreement made with you concerning the corporate language course. We retain invoice details for as long as we are obliged to do so on the basis of our statutory obligation (for tax purposes). For example, we are required by law to retain our tax administration for seven years, and in some cases for ten years. We use the personal data of participants in our corporate language courses provided by the employer for this purpose. In this case, we make

careful arrangements with the employer about the way we handle the personal data of participants.

- **No-obligations online language test**

You can take a free, no-obligations language test on our website to determine your present language level in English, Dutch, Spanish or French. Once the test is complete, each participant will see an estimation of their present language level on the screen. We are able to see how many people have taken the test, but we do not collect any personal data from the test.

- **Intake test (online and offline)**

Once we have received your registration, we may send you an online test together with your login details. We store the results of this test on our website and in our CRM system. The online test may be followed by a personal conversation (in person or by telephone) with one of our teachers. The results of this conversation will also be stored in our CRM system. After the intake assessment, we will share this information with you and advise you on your language level and which course we can offer you.

### 3. Individual language courses

In addition to the group and corporate language courses, we also offer personal, tailor-made courses. To offer you an individual language course, we need the following information: Name and address details, contact details, date of birth, business details (optional) and location (optional) and invoice details. We will also make a note of your exact needs and your present language level. We use these data to carry out or prepare for the agreement made with you for the individual language course. We store your personal data, which we use to provide your personal language course, in our CRM system. We retain invoice details for as long as we are obliged to do so on the basis of our statutory obligation (for tax purposes). For example, we are required by law to retain our tax administration for seven years, and in some cases for ten years.

- **No-obligations online language test**

You can take a free, no-obligations language test on our website to determine your present language level in English, Dutch, Spanish or French. Once the test is complete, each participant will see an estimation of their present language level on the screen. We are able to see how many people have taken the test, but we do not collect any personal data from the test.

- **Intake test (online and offline)**

Once we have received your registration, we may send you an online test together with your login details. We store the results of this test on our website and in our CRM system. The online test may be followed by a personal conversation (in person or by telephone) with one of our teachers. The results of this conversation will also be stored in our CRM system. After the intake assessment, we will share this information with you and advise you on your language level and which course we can offer you.

### 4. Language Tests and Assessments

Besides language courses, we also offer stand-alone language tests and assessments, in which we test whether you meet a predetermined language standard or requirement, or we determine your present language level. If you have reached the required level, UvA Talen will issue you with a certificate stating this. To be able to offer you a language test or assessment, we need the following personal data: Name and address details, contact details, date of birth

and invoice details. We use these data to carry out or prepare for the agreement made with you for the language test or assessment. We retain a hard copy of the language tests for two years from the test date, to be able to provide proof even in the future of the level of language you achieved on that date.

## **5. Online language courses**

You can also order online language courses from UvA Talen. For this we use your name, email address and invoice details. You can also log in using your Facebook account. If you log in using your Facebook account, we will also gain access to your basic information on Facebook. You can choose to have your invoice sent to a third party, such as your employer. If you use this option, we will also use the company name, department, address, postcode and contact details of the third party. We collect these data in order to provide the online language course and so to fulfil the agreement made with you. We retain invoice details for as long as we are obliged to do so on the basis of our statutory obligation (for tax purposes). For example, we are required by law to retain our tax administration for seven years, and in some cases for ten years.

- **Account**

To access certain parts of our website you will need an account. For example, to take online courses, to see your course progress in the dashboard, and to purchase additional products (to extend the present course or purchase a new course).

For your account, we retain all the data provided during registration, as well as information concerning the online courses taken by you. We retain these details so that you do not have to fill them in every time you access the website and to make it easier for us to contact you when necessary in the course of our agreement with you. We retain all the information obtained via your account for as long as your account exists. You may independently make changes to the information you provided during registration or delete it at any time. You may also indicate whether and how often we may approach you with emails related to your course, for example information on follow-on courses.

- **Free online demo**

To get an idea of what our online courses are like, you can take part in a free online demo lesson. The data from this demo are retained for one hour and then deleted. So we do not save any progress information and you are not required to provide any contact details. However, we do measure how many people have clicked on the option to take part in the demo lesson.

## **Ratings/Reviews**

You can write a review on the service(s) we provide in order to let us know what you think of our service. For this, we use your name (optional), contact details (optional), information about the service you used and how you rate the service. We collect these data on the grounds of our legitimate interest, and you are of course in no way obliged to write a review. With your consent, we may also publish your written review on our website. You may withdraw your consent for this at any time by contacting us via the contact details at the end of this statement. We will retain your review-related data until you lodge an objection to this.

## **Job application procedure**

You may apply for a job at UvA Talen. When you apply to us for a job, we collect your name and address details, salutation, contact details, the contents of your CV and cover letter, salary indication (optional), your availability (optional) and any references you may have provided. We process these

data to deal with your job application and – if you come to work for us – to carry out your employment contract, or if you are self-employed, to carry out a contract for the provision of services.

**Please note:** The job application procedure may include a social media and Google screening. This is necessary for us to ensure that when taking on new personnel, our image is maintained. In this screening, we look up your name on Google and any profile you may have on various social media platforms, insofar as these profiles are public. We will not ask you for access to any protected social media pages or to connect to us.

We retain job application details for a maximum of four weeks after the vacancy has been filled.<sup>1</sup> We retain these data so that we can contact you again should the position become vacant again during the trial period. If we are unable to offer you a position at present, but we expect a suitable position to become vacant in the foreseeable future, we may – with your consent – keep your job application details for a further year. You may withdraw your consent for this at any time by sending us an email.

If you come to work for us, we will keep your job application details in your personnel file. This file will be kept for as long as necessary.

### **Retention periods**

Your personal data will be deleted as soon as we no longer need them. This means that we retain your data for as long as these are relevant with regard to the contract we have with you, for as long as we are legally obliged to do so, or until there is no longer any need to keep this information.

### **Website**

- **Cookies**

Our website makes use of cookies and similar technologies in which a small text file is sent to and stored on your device (computer, tablet or mobile phone) when you visit our website. In a subsequent visit to our website, the information stored in this file may be sent back to our secured servers or those of the third party in question. For ease of reading, all such technologies are henceforth referred to as cookies in this document.

Our website uses the following types of cookies:

- *Functional cookies*

These cookies are used to ensure that certain parts of the website function properly and to store your given preferences. Examples of these are for managing preferences such as font preferences and for updating which online courses you have placed in your shopping basket.

- *Analytical cookies*

These cookies are used to analyse how you use our website. They enable us to see which pages and sub-pages you visit and how long your visit to our website lasts, for example. We can then use these insights to improve our website and make it more user-friendly.

On your first visit to our website, we will show a cookie notification message with an explanation about cookies. Here we will also request your consent to the use of these cookies.

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<sup>1</sup> In some cases, we may retain your name and email address for longer than four weeks. The other details will be deleted.  
Comment: Note that this is only permitted if the applicant has given their consent for this.

Party placing the cookies	Type of cookies	Purpose	Retention period
Google Analytics (Google LLC)	Analytical	We use Google Analytics to enable Google to give us insight into how our website is used, to issue us with reports on the use of our website, and to offer us information about the effectiveness of our campaigns. The information we obtain with this, including the address of your computer (IP address), is transferred to Google and is stored by Google on servers in the USA, the last part of your IP address being masked. Google is Privacy Shield certified, which means that suitable measures have been taken to protect your privacy. We have set Google Analytics to respect user privacy, which means we have made agreements about how the data collected are used, among which is that Google is not permitted to share these data or to use the information obtained for other Google services. However, Google may provide information to third parties if Google is legally obliged to do so or if these third parties are processing the data on behalf of Google. This is beyond our sphere of influence. For more information on this, see the <a href="#">Google Privacy Policy</a> .	2 years + session
Google Tag Manager (Google LLC)	Functional	These cookies are functional, and help us to install certain plug-ins and cookies on our website. This cookie only processes a cookie ID. For more information on this, see the <a href="#">Google Privacy Policy</a> .	1 day

We have entered into a processing agreement with the abovementioned parties containing agreements about how the collected data are handled.

**Please note:** the privacy policy of third parties can change regularly.

- **Retention periods and cookie removal**

Most cookies have an expiry date. This means that after a certain period (session) they automatically expire and no longer register data from your visit to the website. You may also choose to remove cookies manually before the expiry date. For more information about this, please see the instruction manual for your browser.

- **Enabling and disabling cookies**

You can set your browser up to only accept enabled cookies with your consent. For more information about this, please see the instruction manual for your browser.

**Note:** some websites do not function optimally if cookies are disabled.

- **Social media buttons**

We use social media buttons on our website. Clicking on these buttons will take you to the UvA Talen page of the social media platform in question. This gives visitors to our website the option to follow UvA Talen and to share content within their own network. Social media buttons work by using pieces of code from the social media network. We have no further influence on this, so we advise you to read the privacy and cookie statements of these social media platforms before using these buttons:

- Facebook (privacy and cookie statement);
- LinkedIn (privacy and cookie statement);
- Instagram (privacy and cookie statement).

- **Spam check**

We use reCAPTCHA to prevent misuse of our contact forms by sending spam messages. When you state that you are not a robot, the following checks are made:

- how quickly the form is filled in;
- what mouse movements are made while the form is being filled in;
- the IP address of the person filling in the form.

These data are analysed by Google to ascertain if the form is being filled in by a legitimate visitor or a bot. A real visitor then only has to click on a tick to confirm that they are not a bot and the message can be sent to the recipient via the completed form. For more information on this, please see the [Google Privacy Policy](#).

## **Security**

The security of your personal data is of great importance to us. We take great care to ensure that we keep your data well secured. For instance, we make sure that only the necessary people have access to your data, that access to your data is secured and that our security measures are regularly checked. Besides this, all our websites use SSL certificates to ensure the secure transfer of your data and sharing data with other communication.

## **Sharing data with other companies or institutions**

It may sometimes be necessary for us to share your personal data with other companies or institutions, because:

- we have engaged their services to support us;
- it is necessary in order for us to fulfil our agreement with you;
- we have a legitimate interest in doing so;
- we are legally obliged to do so (for example if the police requests this in connection with a suspected crime).

The following third parties process your personal details:

- Our ICT service providers;
- Postal and delivery services;
- Payment service providers;
- External professionals (teachers, translators, etc.);
- Digital delivery services;



- Your employer if we provide a language service commissioned by your employer;
- Our cookie service providers (see below).

### **Changes to this privacy and cookie statement**

When we make changes to our website, we also need to change the privacy and cookie statement, so you should always check the date above and check regularly to see if there is a new version. We will also do our best to announce any changes separately.

### **Your rights**

If you have any questions or if you want to know what personal data we hold concerning you, please feel free to contact us at any time. See our contact details below.

You also have the following rights with regard to your personal data:

- The right to an explanation of what personal data we hold and what we do with them
- The right to insight into your exact personal data held by us
- The right to have errors in your personal data rectified
- The right to have your personal data deleted
- The right to have the processing of your personal data restricted
- The right to be sent your personal data in digital form
- The right to withdraw your consent
- The right to object to a certain use of your personal details

Please ensure that you always indicate very clearly who you are, so that we can be certain that we do not give insight into, change or delete the personal data of another person.

### **Complaints**

If you have a complaint about our service with regard to your personal data, please address this in the first instance to the department in question. If it is a general complaint, it will be forwarded to the general manager.

If you feel that we have not dealt with your complaint properly, you have the right to lodge a complaint with the supervising body. This is the [Dutch Data Protection Authority](#).

### **Contact details**

If you still have any questions or comments after reading our privacy and cookie statement, please contact us via the following contact details.

#### **UvA Talen B.V.**

Roetersstraat 25

1018WB Amsterdam

Language courses department: [trainers@uvatalen.nl](mailto:trainers@uvatalen.nl) • +31 20 5254637

Translation department: [vertalers@uvatalen.nl](mailto:vertalers@uvatalen.nl) • +31 20 5254678

Chamber of Commerce registration no. 33286569

#### **Data Protection Officer (DPO)**

Sijmen Cozijnsen

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