

**PRIVACY REGULATIONS IT&CARE B.V.**

**Version 10**

**Classification: Public**

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## Glossary

### **Data subjects**

Natural persons to whom the personal data relates.

### **Personal data**

Any information relating to an identified or identifiable natural person. In the context of the occupational health and safety service, this includes, among other things, medical data, disability information and other personal data that are relevant to the performance of the care tasks.

### **Processing**

Any operation or set of operations which is performed on personal data, or on sets of personal data, whether or not by automatic means. This includes, among other things, the collection, recording, organisation, storage, processing, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, as well as the blocking, erasure or destruction of data.

### **Processor**

The service that processes personal data on behalf of the controller. In this context, IT&Care processes (special) personal data via an occupational health application on behalf of the occupational health and safety services, i.e. ArboNed and HumanCapitalCare (controllers). In addition, IT&Care processes personal data directly on behalf of customers of the occupational health and safety services, i.e. employers (the controller). This processing via a software application only relates to employee data, in other words: the employee administration.

### **Controller**

The department or body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

### **Data Processing Agreement**

An agreement between the controller and the processor (IT&Care) in which agreements are laid down about the processing of personal data. This agreement includes, among other things, the purposes of the processing, the nature and purpose of the processing, the type of personal data, the categories of data subjects and the obligations and rights of the controller and the processor.

## Introduction

This is the privacy policy of IT&Care B.V. (hereinafter: '**IT&Care**') and is part of HumanTotalCare B.V.

This privacy policy provides insight into the personal data we process, the purposes for which we process this data and the way in which we handle this personal data. The law defines personal data as any data relating to an identified or identifiable (natural) person. Processing of personal data includes, but is not limited to: collecting, storing, recording, modifying, retrieving, consulting or destroying personal data.

IT&Care is a certified and independent supplier of software applications (hereinafter: Software) that supports employers, employees, occupational physicians (or other healthcare providers in the field of occupational and occupational medicine) and consultants in the field of work, vitality and health. IT&Care's software is aimed at monitoring and promoting the health, competencies and motivation of employees, in order to keep these employees employable in the long term. The Software processes personal data, which is managed by IT&Care as an independent supplier. Personal data of the following persons is processed in the Software:

- Personal data of employees that they themselves, their supervisor or the healthcare provider who supervises them, place in the Software;
- Personal data of employers and managers;
- Personal data of healthcare providers and (health) insurers.

We handle the personal data we process with care and comply with the applicable laws and regulations, including the General Data Protection Regulation (GDPR).<sup>1</sup> This means, among other things, that IT&Care:

- informs you in an understandable and transparent manner about how and for what purposes the personal data are processed;<sup>2</sup>
- processes personal data only for specified purposes and bases the data processing on one of the bases set out in the GDPR;<sup>3</sup>
- take appropriate security measures to protect personal data against loss and theft;<sup>4</sup>
- inform you of your rights with regard to the personal data processed by IT&Care;<sup>5</sup>
- makes use of the Data Protection Officer appointed within the group (HumanTotalCare), who monitors the careful processing of personal data within IT&Care, supervises compliance with obligations under the GDPR and acts as a contact person for the Dutch Data Protection Authority.

This privacy policy consists of three parts, namely Parts A, B and C.

### Part A

Part A is split into Parts A1 and A2. **Part A1** relates to data of employees whose employer is responsible for processing, for which IT&Care is the direct processor.

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<sup>1</sup> The General Data Protection Regulation (GDPR) is the General Data Protection Regulation. Our privacy policy is also available in English via our website.

<sup>2</sup> Article 5 GDPR.

<sup>3</sup> Article 6 GDPR.

<sup>4</sup> Article 32 GDPR.

<sup>5</sup> Chapter 3 GDPR.

**Part A2** relates to the maintenance of medical records in an occupational health record application with ArboNed and HumanCapitalCare as controllers. IT&Care is once again the processor for this.

Parts A1 and A2 explain how IT&Care, as an independent administrator, handles the personal data processed via the IT&Care Software.

### **Part B**

In addition to personal data that IT&Care processes via the Software it provides, we process a number of other groups of personal data within our organisation, including personal data of our suppliers and personal data of visitors to our website. In **Part B**, we explain how we handle these other groups of personal data.

### **Part C**

The last part contains a number of general provisions. In this section you can read, among other things, how we protect your personal data and who you can contact if you have any questions about this privacy policy.

These privacy regulations are drawn up and managed under the responsibility of the management of IT&Care.

## Part A1

IT&Care is a processor within the meaning of Article 28 of the GDPR. IT&Care processes personal data directly on behalf of customers of the occupational health and safety services, i.e. your employer (the controller). In part A1, the processing via the software relates to employee data, in other words: the employee administration.

This means that IT&Care can process the following personal data:

### Personal data

Including:

- Name and address details;
- E-mail address;
- Telephone number;
- Date of birth;
- Gender;
- Nursing address of the sick employee;
- Employee ID;<sup>6</sup>

### Special categories of personal data

Including:

- Health data, such as the date of the employee's illness, the date of recovery report, the probable duration of the absence, whether one of the safety net provisions of the Sickness Benefits Act applies, whether the employee falls under the Work and Income (Capacity for Work) Act, whether a sick employee has been involved in a traffic accident;
- Unique identifying personal number;

## Part A2

IT&Care also processes personal data, under which special personal data (concerning health) via so-called occupational health file applications. IT&Care processes this personal data on behalf of the occupational health and safety service providers, i.e. ArboNed and HumanCapitalCare. This data is stored strictly separately from the employee administration of clients of the occupational health and safety providers (Part A1). IT&Care can process the following personal data in the maintenance of medical records in the software made available:

### Personal data

Including:

- Name and address details;
- E-mail address;
- Telephone number;
- Date of birth;
- Gender;
- Nursing address of the sick employee;
- Employee ID;<sup>7</sup>

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<sup>6</sup> This refers to the Employee ID, or another code specific to an employee that replaces the Citizen Service Number as a key value, as described in the National Absenteeism Standard ('NVS') 2017. This standard is endorsed by occupational health and safety services, affiliated with the OVAL trade association and managed by the Sivi Foundation.

<sup>7</sup> See footnote 6.

### **Special categories of personal data**

Including:

- Health data, such as the date of the employee's illness, the date of recovery report, the probable duration of the absence, whether one of the safety net provisions of the Sickness Benefits Act applies, whether the employee falls under the Work and Income (Capacity for Work) Act, whether a sick employee has been involved in a traffic accident;
- Unique identifying personal number;
- Medical Data: data about the employee's health that are covered by medical confidentiality and that are necessary for the assessment of the employee's (in)capacity for work by the healthcare provider, the absenteeism counselling and the reintegration of the employee, such as the nature and cause of the illness and the progress of treatment, as well as data that are necessary for the provision of preventive care to the employee;

### **Purposes of processing**

Through the Software, IT&Care supports the processing of personal data by and exchanges personal data between employers, employees, healthcare providers and consultants, but has no influence on which personal data is stored in the Software. This is up to you, your employer, healthcare provider or advisor. Before granting access to the IT&Care Software, IT&Care has entered into a contract with your employer, healthcare provider or consultant. In this document, IT&Care is instructed to process the personal data for certain specific purposes. IT&Care will only process the personal data for these purposes and will comply with the legal and contractual obligations that apply to the data exchange.

At the request of the employer or employee, IT&Care provides personal data from the Software used by the employer to healthcare providers insofar as there is a legal basis for this and insofar as this is necessary. Precise agreements have been made between IT&Care and the employer. At the request of the healthcare provider, IT&Care may exchange personal data with employers and employees if this is necessary and permitted by law, such as personal data included in feedback.

IT&Care ensures that the personal data that you, your employer, healthcare provider or advisor process in the Software are stored securely and are not accessible to unauthorised persons.

### **Basis**

IT&Care processes the above-mentioned personal data because this is necessary for the execution of the agreements that IT&Care has concluded with your employer, healthcare provider or adviser as explained above.

### **Retention period**

IT&Care does not store your personal data that it processes any longer than is necessary for the purpose of the data processing or is required under the Public Records Act or other sector-specific legislation.



## Part B

### Data of visitors to the IT&Care website

#### *Categories of personal data*

If you visit our website, the following personal data may be processed by filling in (contact) forms:

- Name;
- E-mail address;
- Telephone number;
- IP address.

#### *Purposes*

IT&Care processes the above-mentioned personal data for the following purposes:

- To be able to answer your question;
- To be able to process your comment;
- To be able to send you requested information.

#### *Basis*

If you ask us a question or request information, IT&Care has a legitimate interest in processing the above-mentioned personal data. The processing of this data is necessary for the proper handling of your request.

#### *Retention period*

Personal data of visitors to the website will be deleted after your request or question has been answered or your comment has been processed.

### Data from suppliers of goods and services to IT&Care

#### *Categories of personal data*

If IT&Care enters into a business relationship with a supplier that supplies goods and services to IT&Care for the purposes of IT&Care's business operations, the following personal data may be processed:

- First and last name;
- E-mail address;
- Business phone number;
- Business address and place of residence;
- Function;
- Name of the company you work for.

### *Purposes*

IT&Care processes the above personal data for the following purposes:

- Processing invoices;
- Maintaining IT&Care's business network.

### *Basis*

IT&Care processes the above-mentioned personal data because this is necessary to be able to execute agreements with suppliers.

### *Retention period*

We store the personal data or data carriers containing personal data that we need to comply with our statutory administration obligation as an organization, such as invoices, for the applicable statutory retention period. Other personal data will be deleted after termination of the relationship with the supplier.

### **Data of IT&Care employees**

We process personal data of our own employees. We do not take the processing of this data into account in this privacy policy. At the time of employment, we explain to our employees how we handle their personal data.

### **Applicant data**

#### *Categories of personal data*

Within the HumanTotalCare group, the following personal data of applicants are processed for IT&Care:

- Name;
- Email;
- Address;
- Telephone number;
- Other information that is (or may be) important in the context of the assessment of your suitability as a candidate, such as curriculum vitae, references and certificates.

### *Purposes*

The above-mentioned personal data is processed in order to ensure that the application procedure runs smoothly, including:

- Being able to contact the applicant to make an appointment or to provide feedback;
- Being able to assess the applicant's profile for the position for which they have applied.

### *Basis*

IT&Care has a legitimate interest in processing the above-mentioned personal data. The processing of this data is necessary for the application procedure to run smoothly.

### *Retention period*

If the applicant does not enter into employment with us, the personal data will be deleted four weeks after the vacancy has been filled, unless he or she consents to the retention of his personal data for a longer period. Your data as an applicant will be stored and stored with the parent company HumanTotalCare.

## Part C

### Security

Adequate security of your personal data is very important. IT&Care takes all reasonable and appropriate technical and organizational measures to safeguard the confidentiality, integrity and availability of your personal data. We process your personal data within the Netherlands. Personal data will not be transferred to countries outside the European Economic Area ("EEA").

In order to demonstrably guarantee the security of your personal data, IT&Care is ISO 27001 and NEN 7510 certified.

If, despite the security measures taken, a security incident occurs, we will take measures to limit the consequences for your privacy as much as possible.

### Disclosure of personal data to third parties

Personal data that is processed by IT&Care as controller on the basis of its own legal basis will not be actively provided by IT&Care to third parties. If IT&Care does provide personal data to third parties, IT&Care will always obtain prior permission from the parties involved, unless this is not required by law.

### Your rights

As can be read in parts A1 and A2, IT&Care is a processor within the meaning of the GDPR. IT&Care only processes employee data and/or medical data on behalf of your employer or your occupational health and safety service provider, respectively. According to the GDPR, a data subject must exercise his or her rights with the controller. In the case of the employee administration, this is your employer and, in the case of the occupational health file of the company doctor, your occupational health and safety service provider HumanCapitalCare or ArboNed). If you wish to make use of your rights, IT&Care will provide all reasonable cooperation to ensure that your employer or occupational health and safety service provider can comply with the obligations surrounding your requests. You can find out how you can exercise your rights with your employer or your occupational health and safety service in the applicable privacy regulations of your employer or ArboNed or HumanCapitalCare.

For the processing operations referred to in part B, IT&Care is the controller and you have the right to request us in writing to:

- **access to your personal data.** You can ask us if we process your personal data. If this is the case, we will explain to you which of your personal data we process, how we do this and for what purposes. You can also request us to provide you with a copy of the personal data we process about you;
- **Rectification of your personal data.** If you believe that the personal data we process about you is incorrect or incomplete, you can request us to supplement or amend your data;
- **Destruction of your personal data ('right to erasure').** You can request us to erase the personal data we process about you. Upon receipt of a request to do so, we will delete your data without undue delay if:
  - the data is no longer necessary for the purpose for which we processed it;

- you no longer give us permission to process your personal data;
  - you object to the processing of the personal data and there is no reason why we should be allowed to continue processing the data;
  - the data has been processed by us in the context of direct marketing
  - The personal data should not have been processed by us ('unlawful processing');
  - The law obliges us to delete the personal data. If there is a legal retention obligation, we are not allowed to destroy personal data on request.
- **restriction of the processing of your personal data.** You can request us to restrict the processing of your personal data. We will comply with such a request in the following cases:
- You believe that the data we process about you is inaccurate. Until the data has been checked and possibly adjusted or supplemented, we will not use this personal data;
  - We should not have processed the personal data, but you do not want us to (completely) delete your personal data.
  - We no longer need your personal data, but you still want to be able to use this data to file a claim or start legal proceedings;
  - You object to our processing of your personal data and we have not yet assessed this objection.
  - If there is a restriction on the processing of your personal data, we will only process this data with your consent. We will notify you before the restriction is lifted.
- **Transfer of your personal data.** You can request us to provide you with a copy of the personal data we process about you. We will provide you with a copy in a commonly used format that can be used if, for example, you want to transfer the data to another service provider, such as another occupational health and safety service. If this is technically possible for us and you wish to do so, we can transfer the personal data directly to your new service provider.

## Notice

At your request, we may rectify, erase or restrict the processing of your personal data. It is possible that we have provided the personal data to which your request relates to a third party. If we have rectified, erased or restricted the processing of your personal data, we will notify these third parties, unless this is not possible for us. At your request, we will provide you with information about these third parties.

## Right to object

You also have the right to **object** in writing to the processing of your personal data. If you object, please explain to us why you do not agree with the processing of your personal data.

## Processing your request

Requests that you address to us on the basis of the above rights will be carried out as soon as possible and at the latest within one month of receipt. We may need more time to process your request. If so, we will notify you within one month of receipt of your request

at the latest. In that case, we may extend the period within which your request will be carried out by a maximum of two months.

If we do not comply with your request, we will notify you in writing no later than one month after receipt of the request. In that case, you have the right to file a complaint with the Dutch Data Protection Authority.

### **Complaints – where can you go with complaints?**

If you are of the opinion that the provisions of these rules do not apply. If your rights with regard to the processing of personal data are not respected, you can make your complaint known to us via the e-mail address [privacy@humantotalcare.nl](mailto:privacy@humantotalcare.nl) or by calling 040 – 26 01 200.

### **Cookies**

IT&Care uses cookies on its website. In our cookie statement you can read more about what cookies are and which cookies IT&Care places on its website.

### **Contact Details**

If you have any questions about this privacy policy, our cookie statement or the processing of your personal data by IT&Care, please contact our Data Protection Officer using the contact details below.

IT&Care B.V.

Attn: Data Protection Officer Science Park Eindhoven  
5127  
5692 ED Son  
Phone number: 040 – 26 01 200  
E-mail address: [privacy@humantotalcare.nl](mailto:privacy@humantotalcare.nl)

### **Where can you find this privacy policy?**

The regulations can be viewed and downloaded free of charge from the website [www.itandcare.nl](http://www.itandcare.nl).

### **Third-Party Websites**

This privacy policy does not apply to third-party websites that are linked to our website.

### **Alterations**

We reserve the right to change this privacy policy. Changes will be published on our website. It is recommended that you consult this Privacy Policy regularly so that you are aware of any changes.

This Privacy Policy was last updated on 23 Juli 2025