

Privacy statement

June 26, 2023

Your privacy is very important to A New Spring BV. That's why we abide by privacy laws. This means your personal information is safe with us and that we won't misuse them. We'd like to inform you about what we do with your data on our website www.anewspring.com.

A New Spring BV is the party responsible for all data processing. In this privacy statement, we will explain which personal data we collect and for which purposes. We recommend that you read it carefully.

If you have any other questions or if you'd like to see what information we hold onto, please don't hesitate to [contact](#) A New Spring BV.

What personal information do we process?

We process the following personal data:

Name and surname, phone number, email address, participation details (from events, online subscriptions and/or meetings), IP-address, social ID, cookie ID and browsing behavior.

Why and how do we process this personal data?

During the processing we conform to the requirements of the General Data Protection Regulation. This means we:

- **clearly specify our purposes** before we process personal data, by using this Privacy Statement;
- **limit our collection of personal data** to only the personal data needed for legitimate purposes;
- first **ask for explicit permission** to process your personal data in cases where your permission is required;
- take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **respect your right** to inspect, correct or delete your personal data held by us.

Why do we process personal data?

We process your personal data for the following purposes:

» Statistics and profiling

We keep statistics on the use of our website using Google Analytics and Hotjar. These statistics help us to improve our website, for example so that we can only show you information which is relevant to you. We anonymise the data before saving it. To do so, the last eight numbers of your IP-address are masked. We do not provide this data to other Google services or parties.

We may combine personal data to get to know more about you. This is always restricted to the information you have shared with us. For this purpose, we use your IP-address and email address. We have a legitimate interest in doing this. We will store this information for the same period as your personal data. If you do not want us to use your personal data for these statistics, please let us know or simply turn off the Functional Cookies in our Cookie settings.

» Contact Form and Subscription based channels

You can use our contact form to ask us questions or to place a request.

To do so, we need your email address, IP address and phone number. We have a legitimate interest in doing this. We will store this information until we are sure that you are satisfied with our response and twenty-four months thereafter for a possible follow-up and quality purposes. We have chosen this term, because it concerns the average time that trainers need to properly orient themselves on the use of an online learning platform and to make a final choice. This allows us to easily access the information in case you have any further questions. Also, it may help us to further improve our customer service.

We also have Subscription-based channels to inform those interested in our products and/or services. Each email in these channels contains a link to unsubscribe yourself from our newsletter at any time. Your email address is only added to our list of subscribers with your permission. We store this information up to three months after you cancel your subscription.

» Providing Information to Third Parties

In certain regions we work with partners to provide our services. If you are within one of those regions, we will share the aforementioned personal data with the relevant partner. Our partner may approach you directly for acquisition purposes on behalf of aNewSpring.

These are our partners:

- ReadyTech Group (Australia and New Zealand)
- New Leaf Technologies (South Africa)
- iPRO Sp. z o.o. (Poland)

» Providing Information to other companies or organisations

Except for the parties mentioned above, we do not under any circumstance provide your personal data to other companies or organisations, unless we are required so by law (for example, when the police demands access to personal data in case of a suspected crime). We have incorporated social media buttons into our website. These buttons are used by the administrators of those online services to collect your personal data. If this makes you uncomfortable, you can switch off this function at our Cookie settings.

» Promotion

Other than the advertisements on the website, we can inform you about new products or services:

- by mail
- by email
- via social media
- per phone

You can object at all times against this promotional communication. Every letter contains instructions on how to do this. Also, every email contains an unsubscribe link. On social media, you can block us or use the unsubscribe option. You can also inform us when we call you.

» Handling your order

When placing an order with aNewSpring, we will use your personal data to handle your order with utmost care.

For this purpose, we use your first name, email address, phone number, IP-address and payment details. We are required to use this information by law. We store this information until your order has been completed and seven years thereafter (which is the legal retention period).

» Marketing

At aNewSpring, we like to stay on top of marketing. That's why we like to recruit new customers, lecturers for our events, experts for our inspirational sessions and sometimes even new colleagues. We process their personal data in order to stay in contact with them. This personal data includes any preferences, which you can at any change at any time using the 'email preferences to' link in every mail.

Location data

If necessary, we may collect your location data (GPS). If that is the case, you will be asked to give your consent beforehand.

This location data and other data can also be stored and processed by the provider of the navigation software, such as Google Maps, but the data could also be used by, for example, Google or Apple itself. We have no control over their actions. We recommend that you read the applicable privacy statement of the provider in question.

Cookies

Our online service makes use of cookies. Cookies are small files in which we can store information, so that you do not have to fill out this information again. We can also use them to see whether you are visiting us again.

The first time you visit our online service, we will show you a notification explaining our cookies and ask for your permission for the use of these cookies.

You can disable the use of cookies through your browser setting at the Cookie settings, however, some parts of our website may not work properly as a result of that.

We made arrangements with other parties who place cookies through our website. Nevertheless, we cannot fully control what they are doing with their cookies, so we advise you to read their privacy statements as well.

You can find the following types of cookies on our website:

» Website Statistics

We use Google Analytics and Hotjar to track visitors on our website and to get reports about how visitors use the website. We anonymise this data before we save it. To do so, we anonymise your IP-address. We do not allow Google or other parties to use this information for any other purposes.

» Functional Cookies

When you visit our website, WordPress makes use of cookies to check whether cookies are supported by your browser. These cookies are used to optimise the use of our website and to keep track of personal preferences.

» Social Media and Video Tools

We use services of other companies for certain plugins. We have come to an agreement with these other companies about the function and use of their cookies. Nevertheless, we cannot fully control what they are doing with their cookies, so we advise you to read their privacy statements as well. The following companies have placed their cookie on our website:

- Vimeo
- Youtube
- Facebook
- Twitter
- LinkedIn

» Google

We use Google Analytics to track visitors on our website and to get reports about how visitors use the website. We do not allow Google to use information obtained by Analytics for other Google services. Also, we anonymise any IP-addresses.

» Hotjar

We use Hotjar to track visitors on our website and to get reports about how visitors use the website. Any IP-addresses are anonymised. We also use Hotjar to conduct anonymous surveys on our website.

» HubSpot Plug-in

We use Hubspot to safely collect, save and use your personal data and contact preferences for certain plug-ins, such as our chat system. We also use plugins to ensure the proper functioning of our website.

» HubSpot CRM

We use HubSpot CRM to safely save the personal data and contact preferences you have provided to us. We've come to a strict data processing agreement with Hubspot. They are allowed to keep track of the following personal data: name and surname, telephone number, email address, participation details (of events, online subscriptions and/or meetings), IP-address, social ID and cookie ID.

In addition, we can use email tracking for mailings to our contacts, through which we can see whether a certain mailing has been loaded (and can therefore be considered read). We do not use this information for legal purposes. You can turn off email tracking by blocking tracking pixels in your mail program.

Security

Security of personal data is very important to us. To protect your privacy, we take the following measures in particular:

- After receipt, the data will be stored in a separate system (HubSpot)
- We make use of secure connections (Secure Sockets Layer of SSL) to encrypt all information between you and our website when entering your personal data
- We are ISO 27001 certified

Changes to this Privacy Statement

When our website changes, naturally we may have to adjust our privacy statement. Please check the release date at the top of this statement to make sure you are aware of our latest version.

Inspection and Modification of your Data

You can always contact us if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data. Please see the contact details at the bottom of this privacy statement.

You have the following rights:

- Being informed on which personal data we have and what we are using it for;
- Inspection of the personal data that we keep from you;
- Having incorrect data corrected;
- Request to delete outdated personal data;
- Revoke your consent;
- Object to certain uses.
- Please note that you always make clear who you are, so that we can assure that we do not modify or remove the data from the wrong person.

Complaints

If you think that we are not helping you in the right way, you have the right to lodge a complaint at the authority. For The Netherlands, this is the [Autoriteit Persoonsgegevens](#).

We do not have a Data Protection Officer, but we are happy to help you with your questions. Feel free to contact us via the contact details below.

Contact details

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