

Privacystatement Empowr Holding B.V.

Empowr. Holding B.V. (**Empowr**) collects and processes various personal data from you through its website, including the Empowr platform. Empowr qualifies as the **data controller** in this context.

Your privacy is important to us. Through this privacy statement, we inform you about how we handle your personal data and, consequently, your privacy.

In processing your personal data, we adhere to the requirements set forth by laws and regulations such as the General Data Protection Regulation (GDPR) and the Telecommunications Act. This includes, among other things:

- Clearly stating which personal data we process, for what purposes, and on what legal basis(es). We do this through this privacy statement;
- Limiting the collection of your personal data to only the data necessary for the purposes for which it is collected.
- Implementing appropriate security measures to protect your personal data and demanding the same from parties processing personal data on our behalf.
- Not retaining your personal data longer than necessary for the specific purpose for which we obtained it, unless a legal obligation requires us to do so.
- Informing you about your rights to access, rectify, erase, restrict processing, and/or transfer (portability) your personal data upon request, as well as the right to object to processing.

DATA CONTROLLER

Empowr is responsible for processing your data when you use our services, including availing our mental care and well-being offerings through our platform and using this website.

Empowr. Holding B.V.
Amsteldijk 713
1074 JH Amsterdam
Chamber of Commerce (KVK) number: 85051829

For all questions and/or comments regarding this privacy statement, you can reach Empowr at info@empowr.nl.

AMENDMENTS

We may change this privacy statement from time to time, for example, as we expand our services. The most recent version of our privacy statement is available on Empowr.nl under the 'Privacy Statement' section. We will process your personal data in accordance with the privacy statement that was in effect at the time of collecting your personal data.

This privacy statement was last updated on January 22, 2024.

WHAT IS PERSONAL DATA?

Personal data is any information about an identified or identifiable natural person. This means that information either directly concerns someone or can be traced back to them when combined with other data.

WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSE?

Below is an overview of the personal data processed by us, the purposes for processing that personal data, and the legal basis. To the extent possible, we will also indicate how long we will process this personal data. In principle, we will retain personal data until it is no longer necessary for the purpose for which it was collected, unless Empowr is legally obligated to retain the data.

The processing of personal data takes place based on your (express or implied) consent, to perform a contract with you, due to a legal obligation, or based on a legitimate interest of Empowr or a third party. Legitimate interests include security, IT management, research and analysis of our own products or services, informing about similar products or services, business management, legal matters, and internal management.

Below, we will inform you about the personal data we process when using our website and when using the Empowr platform to avail our mental care and well-being offerings.

USING THE WEBSITE

a. Scheduling a demo or a meeting

Through our website, you can schedule a demo of our platform or a meeting with one of our employees. We use the online service Calendly for this purpose. To schedule an appointment, you need to provide your name, email address, and phone number. You will receive a confirmation of your appointment by email. The data collected during the demo will be deleted no later than 1 year after the demo if you do not use our platform.

b. Platform Trial Period

Through our website, you can request a free trial period to explore our full range of partners and services, enroll in masterclasses, or seek support. To use this trial period, we ask for your first and last name, the role in which you want to use the platform (as an employee, employer, provider, student, or other), and your email address. After providing this information, you will receive your login details for your demo account by email. Your demo account will be inaccessible and will be deleted within 30 days after the trial period expires, unless your account is converted into a paid account.

c. Contact

Our website provides a web form through which you can contact us directly. To answer your question or process your comment, we ask for your first and last name, the role in which you want to use our platform, your (business) email address, and your specific request or question through our contact form. We will then respond by email. You can also contact us yourself (e.g., by phone or email). The data you provide will be processed in the context of (the possible conclusion of) an agreement with you or based on your consent, and will be deleted within 30 days after your contact request is resolved or completed.

d. Cookies

Various cookies are placed while browsing our website. A cookie is a small file sent by an internet server and stored on your computer. We use necessary technical cookies that enable the use of our website. We also use analytical cookies that store technical information about your device (smartphone/laptop/tablet) and measure the visits to our website. We use information about the use of our website(s) to improve our online services, for which we have a legitimate interest. For the use of these necessary cookies and analytical cookies that have a minimal impact on privacy, we do not need to request prior consent. You can object to the placement of these analytical and statistical cookies at any time via the cookie banner.

With your consent, we also use cookies to manage personal settings and so-called marketing and advertising cookies. More information about the cookies used on our website can be found in our cookie statement.

USING THE EMPOWR PLATFORM

a. Your Registration and Account with Empowr

When your employer enters into an agreement with Empowr, we ask for certain personal data to create a personal account for you. For example, we ask for your name and email address to create the account and provide access to the platform via a personal account with a unique login. We also ask for your language preference to make the platform easily accessible, whether there is a possible individual (development) budget, and whether you have a leadership position, in which case you are authorized to book team products. We obtain this data directly from your employer if you choose to use our platform. Without an account, it is not possible to use our platform.

After creating an account, we will send you messages (e.g., personal communication or a newsletter) to the email address you provided to inform you about products or services that fall within the agreed budget. See also section d.

You can further personalize your account by entering your date of birth, address, place of residence, language settings, and phone number. This is not mandatory, and you can delete this information at any time. To receive certain physical products from us, you can also store your address details.

b. Mental Check-in (only valid for users before December 31, 2023)

When signing up and periodically thereafter, a WHO survey is sent to create an indicative mental health score. Completing this survey is not mandatory. The final score is used solely to indicate improvement on a personal level. This score is carefully stored for a duration of 1 year after completing the survey and is anonymized and aggregated to create statistics at the company level. You can request deletion of your personal score at any time.

c. Bookings, Masterclasses, and Appointments

When you place a booking for a product or service through our website, we may ask you to provide certain personal data, such as your address details (for sending physical books to your address or scheduling a retreat) or your dietary preferences. If your booking request needs approval from your employer, we will only send your name and the fact that you are requesting a booking in a specific theme to your employer. These data will then be forwarded to the relevant care provider, who will contact you to schedule an appointment.

We process this personal data to execute the agreement, namely to process your booking or provide the service, connect you with the care provider, inform you about the progress of the booking, and ask for feedback in the form of a review after completion. The fact that you have requested a booking does not reveal anything about your health condition.

If you sign up for one of the masterclasses or webinars from our certified providers, we will send you a link to the online masterclass by email.

To schedule a consultation with one of our coaches, you can directly schedule an appointment in the coach's calendar via the online service Calendly. For preparation and scheduling of the consultation, the coach receives your name, email address, and company name. We do not store data about (the content of) these consultations.

You will receive a confirmation of your registration(s) by email.

We also keep track of whether you have requested a booking through your account and whether this booking has been realized. We do not store information about the form of care booked or taken through your account. Only if an individual development budget has been allocated to your account will we inform your employer that a booking has been realized through your account, but no information about the specific booking or care provider will be shared.

d. (Personal) Communication

After creating an account, we will periodically send you mailings with potentially interesting products, services, or other information. You can unsubscribe from these mailings at any time by using the unsubscribe link at the bottom of each message.

We will also inform you by email about your account, the status of your registration(s), and your remaining budget.

HOW LONG DO WE RETAIN YOUR DATA?

We will retain personal data as long as necessary or permitted within the framework of the purposes described in this privacy statement and in accordance with applicable law. Criteria used to determine our storage period include:

- The duration of our ongoing relationship with you and the services we provide to you (e.g., as long as you have an account with us or continue to use our services).
- Whether there is a legal obligation we must comply with (certain laws, for example, require us to retain our transactions for a certain time before we can delete them).
- Whether retention is desirable given our legal position (e.g., with regard to limitation periods, disputes, or investigations by regulatory authorities).

WHO DO WE SHARE YOUR DATA WITH?

Empowr shares your personal data with third parties in some cases. We may provide your data to another party in, among other cases:

- If you have given your consent;
- If we are legally obligated or authorized to provide personal data to third parties;
- If it is necessary for the execution of the agreement with you (or in preparation for it), such as when we provide your contact details to the care provider you selected to realize the booking, to digitally schedule appointments with coaches or care providers, or in the case of an individual development budget, when we inform your employer that a certain budget has been used;
- For legitimate business interests, such as maintaining central administration or customer service, sending newsletters, analyzing our service to you, or in the context of legal or tax advice (e.g., accountants and legal advisors), or for business organizational purposes (such as the sale of business activities or shares or a reorganization).

In some cases, Empowr is obliged to process and provide certain personal data to third parties, such as the police in connection with a criminal investigation or to a supervisory authority.

If personal data is provided to a party outside the European Economic Area, this is generally only done to a recipient in a country that, according to the European Commission, provides an appropriate level of protection for personal data. If personal data is sent to a party in a country for which no adequacy decision of the European Commission applies, Empowr will ensure that appropriate safeguards are taken to protect your personal data. If you wish to receive further information about the transfer of your personal data to countries outside the European Economic Area and these appropriate safeguards, you can contact Empowr via info@empowr.nl.

SECURITY OF PERSONAL DATA

We take the necessary technical and organizational measures to protect your personal data. When we transfer or receive your personal data on our website, we always use encryption technologies that are recognized as common standards within the IT sector. These security measures are periodically reviewed based on threats.

MINORS

If you are 16 years old or younger, you may only use our website and/or services under the supervision and with the consent of your parents or legal representatives. Under no circumstances will we intentionally process personal data of individuals under the age of 16.

If you, as a parent or legal representative, become aware that we have unintentionally processed the personal data of your minor child, a request for the deletion of that personal data can be made by sending an email with the description of your request to info@empowr.nl (see Article 9). In such a case, we will promptly proceed with the deletion of the personal data of the relevant minor.

WHAT ARE YOUR RIGHTS?

You have the right to know which personal data we process about you and to whom we have provided your personal data. If you have given consent for the processing of your personal data, you also have the right to withdraw it. The withdrawal of your consent does not affect the lawfulness of the processing before the withdrawal (or the processing based on another legal basis).

If you want to view, correct, update, restrict, or delete the personal data processed by us, object to the processing of personal data or direct marketing, or if you want to receive an electronic copy of your personal data to transfer it to another company (to the extent this right to data portability is provided to you by applicable law), you can contact Empowr via info@empowr.nl. You can also change your contact details via your own account. You can exercise your rights only to the extent permitted by law.

We request you to describe as clearly as possible in your request which personal data your request relates to. We will respond to your request as soon as reasonably practicable but in any case within one month of receiving it. In the case of a large number of requests or their complexity, we may extend this period by two months. We will inform you about this as well.

Finally, you have the right to file a complaint at any time with the supervisory authority, such as the Dutch Data Protection Authority.

To verify your identity in the context of such a request (and thus secure your personal data), we may, in some cases, ask you to confirm your identity (for example, via a verification email).

CONTACT

For all questions and/or comments regarding this privacy statement or the processing of your personal data by Empowr in general, you can reach Empowr via info@empowr.nl.