



PRIVACY POLICY

This website is owned and operated by the Research in Occupational Therapy and Occupational Science Foundation (ROTOS). ROTOS is a CHARITY registered under the Dutch Law with the KVK CODE: 77629779. The organisation's address is Orteliuslaan 750, 3528 BB UTRECHT, the Netherlands.

One of your rights is that you must be informed when personal data (information which directly or indirectly identifies you – is 'processed'). You also have the right to know the details and purpose of that processing. This privacy policy describes our practices relating to the personal data of visitors of this website. It is meant to help you understand what information we collect, why we collect it and how you can update, manage, and delete your personal data.

For all our services, the 'data controller' that is responsible for your privacy, is ROTOS. In this privacy policy "We/our/us" means ROTOS and the service relates to the [ROTOS website](#) you are presently on.

Any data protection queries can be emailed directly to us in the following email: communications@rotos.eu

1. INTRODUCTION

ROTOS takes the protection of your privacy very seriously and recognises its obligations as a Data Controller of the ROTOS website ([ROTOS website](#)) in terms of applicable data protection law, mainly the General Data Protection Regulation EU 2016/679, the [Dutch Data Protection Act \(DPA\)](#) and together with other laws which relate to privacy and electronic communications.

This Privacy Policy will be revised and updated every two years and/or in the case a new regulation or procedure comes up. All the changes of the Privacy Policy will be posted on [ROTOS website](#) and updated in this document.



2. DATA PROTECTION PRINCIPLES

We are committed towards compliance with the principle of accountability and the 6 GDPR Data Protection Principles:

- Lawfulness, fairness and transparency; to process personal data lawfully, fairly and in a transparent manner;
- Purpose Limitation; to process personal data for specified, explicit and legitimate and compatible purposes;
- Data Minimisation; to process personal data only as is adequate, relevant and limited to what is necessary in relation to the purposes;
- Accuracy; to process personal data which is accurate and up to date
- Storage Limitation; to process personal data for no longer than is necessary for the purposes for which it was processed;
- Integrity and Confidentiality; to process personal data in a manner that ensures appropriate security of the personal data;

3. DATA WE PROCESS

Some services from our [ROTOS website](#) may need that you share personal data with us. We collect and process this personal data in order to provide different services to the users of the website.

Such personal information may be requested from you when you fill in a field or a form (e.g. to contact us or avail of a service). We do NOT require any personal data for you to operate and benefit from the main, free function, of this site – and that is to obtain general information about the work carried out by ROTOS and sharing of information.

If you provide personal data to us about someone else you should ensure that you are entitled to disclose that personal data to us and that, without us taking any further steps, we may collect, use and disclose that personal data as described in this privacy policy.

When you browse our website we also collect information about your device and originating IP which is then used for anonymised statistical analysis of data and browsing patterns on our site.



4. GROUND FOR PROCESSING

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To comply with our legal and regulatory obligations. When we need to protect your interests (or someone else's interests). When it is needed in the public interest or for official purposes.
- For our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- When you have given consent. Where we apply your consent as a basis to process personal data we acknowledge that you may withdraw such consent at any time – in which case, unless there is another lawful ground which permits us to continue to process the personal data, we shall cease to process that personal data. Before giving us your consent please be sure that you understood what we are asking your consent for.

5. RECIPIENTS OF DATA

We may use service providers to help us provide you with our services. Personal data may be transferred to such a service provider, who will act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed.

Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use the personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and not to disclose your personal data to third parties except as may be required by law, as permitted by us or stated in this Privacy Policy. In appropriate circumstances we may disclose data to authorised bodies as required by law.

6. RETENTION PERIOD

We will hold on to your information for no longer than is necessary keeping in mind the purpose/s (or compatible purposes) for which we first collected the data and the purposes set out in this privacy policy.

We may also keep hold of some of your information if it becomes necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Different retention periods apply for different types of data and different criteria will apply for the determination of retention periods. The retention periods we apply take account of:

- Legal and regulatory requirements and guidance;
- Minimum retention periods provided by law;
- Laws which require retention of periods for undefined terms, including the GDPR;
- Laws which grant special powers to authorities to investigate or act within periods commencing after discovering breaches;
- Prescriptive Limitation periods that apply in respect of taking legal action;
- Good practice;
- The operational requirements and the nature of our business.

In general, however all personal data is destroyed or anonymised with four (4) years from last processing date.

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

7. DATA SHARING



We do not, and will not, sell any of your personal data to any third party.

In the course of our business it may be necessary for us share your data with the following categories of persons/companies/entities as an essential part of being able to provide our services, as set out in this statement:

- Hosting Company: With One.com since we host this site on their server.
- Our Affiliate organisations: ENOTHE, COTEC, OT-Europe especially in the case of Register of Experts.

8. YOUR RIGHTS AS A DATA SUBJECT

The General Data Protection Regulation provides the following rights (subject to some exemptions):

1. The right to be informed about how your personal information is being used. We need to be clear with you about how we process your personal data. We do this through this Privacy Policy, which we will keep as up to date as possible.
2. The right to access the personal information we hold about you. You can access the personal data we hold on you by contacting us on communications@rotos.eu . To process your request, we will ask you to send us proof of identity so that we can be sure we are releasing your personal data to the right person. We will carry out our best efforts to process your request within one (1) week or, if the request is particularly complex, two (2) weeks. We can provide you with a copy of your personal data in electronic format or hard copy. If we consider the frequency of your requests as being unreasonable, we may refuse to comply with your request. In those circumstances, if you disagree, you can complain to the German data protection authority.
3. The right to request the correction of inaccurate personal information we hold about you;
4. The right to request that we delete your data or stop processing it or collecting it; You can ask us to delete your personal data as long as such deletion is not prejudicial to obligations we may have.
5. The right to stop direct marketing messages;
6. The right to object to certain processing based on legitimate interest. You have a right to object to our use of your personal information including where we use it for our

legitimate interests or where we use your personal information to carry out profiling using automated means.

7. The right to withdraw consent for other consent-based processing at any time;
8. The right to request that we transfer or port elements of your data either to you or another service provider. You have the right to move, copy or transfer your personal data from one organisation to another. If you do wish to transfer your personal data, we would be happy to help.

If you want to exercise your rights, have a complaint, or just have questions, please contact us here communications@rotos.eu .

Please note this document can be modified in order to update the information.

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ANNEX I

This information is specifically about the data that [ROTOS website](#) processes when a person/institution creates a user in our website to join the different services [ROTOS website](#)'s provides.

1. **What personal data could we process?** (Depending on the service you decide to use)

- Name
- Address
- Email address
- Telephone number
- Payment details

2. **Where do we obtain your personal data from?**

Most of the above personal data is received direct from you (the data subject) when you decide to register or use any of [ROTOS website](#) 's services.

However, information may be received from third parties (e.g. the ROTOS Foundation Bank or the Stripe Secure system for processing credit card payments).

3. **Why do we process your personal data and what is the lawful basis?**

1. Personal data and contact details: We process this data due to Contractual Necessity, Legitimate Interest and Consent for administration and communication operations between [ROTOS website](#) and you regarding any of our services.
2. We also process personal data for the Association's legitimate interests as we have outline in the main Privacy Policy. Please be assured that we will always take account of your personal data rights in doing so.

4. **Where do we obtain your personal data from?**

Most of the personal data received is directly from you (the data subject). However, information may be received from third parties, e.g. the ROTOS Foundation Bank or Secure Payments system.

5. **How long do we hold your personal data?**

Personal data will be retained in accordance with statutory requirements.

Are you obliged to provide us with your personal data? You are not obliged to provide the personal data in question. However, if you do not provide the personal

data, we will be unable to perform any contract we have with you for the different services.