

# **Privacy statement**

Company: Grip Psychologen

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# 1. Introduction

## 1.1 Necessary for our services

In order to provide good care, we collect your personal data. This is essential for:

- Treatment quality;
- contacting you;
- invoicing.

We do not deliver all of our services ourselves; other service providers are involved as well. This makes it necessary to transfer your data to third parties. For example, if you need a referral to another specialist, we need to transfer part of your medical file to the specialist. We only do so if you have given your consent. We will then only tranfer data necessary for that specific service.

## **1.2 Legal obligations**

Care providers are obliged to store medical files for 15 years. When the legal retention period is expired and you are no longer a patient of ours, your data will be destroyed. In case you remain a patient, we will keep your data in the context of future treatments.

## 1.3 Whom does this privacy statement apply to?

This privacy statement applies to all of our patients. This statement is also applicable to the following situations:

- when you visit our website;
- if you are a former patient;
- in case you registered for treatment, but eventually weren't treated at Grip;
- when we act on behalf of your care provider.

#### 1.4 Who is responsible for your data?

Our organization is the controller of the collection and use of your data.

#### 2. Personal data and processing

#### 2.1 What are personal data?

Personal data are data that are traceable to a natural person. There are various categories of personal data, such as data concerning treatment, invoicing and referrals. When you are a patient of ours, we need some of your personal data, like your name, address, date of birth, account number, phone number and e-mail address. When you are undergoing treatment, these personal data and data concerning treatment and research, are recorded in your medical file. Your medical file is electronically stored, together with your care plan, moments of contact with the specialist other personal data.

#### 2.2 What does processing mean?

The definition of processing is comprehensive, but includes the collection, storage, consultation, use of date and relating data from different medical specialists. It also entails the transfer of data to other parties providing us services.

#### 2.3 Why do we need permission for processing?

We are not allowed to process your personal data without legitimate reasons. Often, a legitimate reason results from the treatment agreement or from a legal obligation. This is sometimes based on your explicit consent. Before you start your treatment with us, we ask for your consent. For children under the age of 16, we ask consent from one of the parents. You can withdraw your consent at any time.

When you do not consent or withdraw your permission, we can no longer be of good service. Guarantee of best possible care can only be provided if all relevant data are available. Moreover, we are obliged to compile a medical file to guarantee the quality of (future) care.

#### 3. What do we do with your data?

#### 3.1 Sign up

When you sign up for treatment, we will need your BSN-number on top of the data mentioned under 2.1. For this, we need to verify you identity card. We will not make a copy or scan. When this becomes relevant, we will ask you for your file from your previous care provider.

#### 3.2 Referral

In some cases it is necessary to refer you to another specialist. We only transfer the necessary personal data to this specialist. If you make an appointment with this specialist, this will be considered as consent for the transfer of your data.

#### 3.3 Payment

We use your data to invoice your health insurer for the treatment. This can also be done through a factoring company or administration office. On this invoice are mentioned your personal data and a specification of the treatment. We store these invoices for our debtor administration. When an invoice has not been payed after multiple reminders, data can be transfered to third parties.

#### 3.4 Health insurance

If you are insured, we exchange your personal data with your health insurer. We only exchange necessary data. For research or control, the health insurer can request data of the insured client. Depending on the type of research, we have to share the requested data. In these instances, we will always set priority to the privacy of our patients.

## 3.5 Visits to website

When you visit our website, we can process some data through cookies.

## 3.6 Reporting of incidences

In the instance where the protection of your personal data is compromised – or if we presume that this the case – we will report this to the Autoriteit Persoonsgegevens (Dutch authority of personal data). If the incident relates to personal data and this possibly forms a threat to your rights and freedom, we will notify you instantly.

## 3.6 Processor

It could be necessary to transfer your data to third parties, such as an ICT supplier or administration office. If this third parties qualifies as processor, we will enter a processing agreement with this party, which will protect your privacy.

## 4. Obligations care provider

## 4.1 Security

Caregivers have professional confidentiality and are not allowed to pass around any data to others. All of our staff members that process or take note of patient data are obliged to confidentiality.

Data from your file are only available to those involved in your treatment, or when you have provided consent for the sharing of your data. We do not transfer personal data to a country outside of the European Economical Area (EEA).

Caregivers are only allowed to sign in to the electronic files via their own account. In exceptional cases, it can be necessary to quickly access a patient file, such as in an emergency situation.

Beside the mentioned organizational measures, we will also take sufficient technical security action to protect your personal data.

## 4.2 Accountability

In order to meet the standard that is key to our accountability, we keep registers of processing and potential data leaks.

## 5. What are your rights?

#### 5.1 Right to access and copy

You have the right to access the data in your file. By appointment, you can access your file under the guidance of the care professional. Furthermore, you have the right to receive a copy of your file. This right of copy does not entail personal notes. Data of third parties present in your file will be made invisible.

## 5.2 Right to correction

You have the right to rectify incorrect personal data. Moreover, you can supplement your patient file. For example, this can be a second opinion from another care provider, or your own opinion on the treatment. Make sure that you inform us about any adjustments in your data, such as your home address after moving, or a change of phone number. For simple adjustments, you can contact our practice by calling or sending an e-mail. For more complex adjustments, you have to fill out the statement found at the bottom of this document in order to submit a request.

#### 5.3 Right to removal

You have the right to request removal of your data. This removal is not always possible. The substantial interest of another to keep the data must be taken into account (a lawsuit or inheritability, for example). Other legal prescriptions that oppose destruction have to be taken into account as well.

## 5.5 Right to file a complaint

In case you have a complaint about the processing of your personal data, we request you to contact us. If this does not lead to the desired result, you have the possibility to file a complaint at the Autoriteit Persoonsgegevens, the supervisory authority in the field of privacy.

# 5.4 Other rights

You also have the right to:

- receive information about your data;
- limit the processing of data;
- oppose to the processing of data;
- receive your data in electric form.

If you wish to excercise one of your rights, we ask you to submit a written request. At the bottom of this statement, you will find where to submit this request. We strive to repond to your request within four weeks.

## **Questions?**

If you wish to excercise one of your rights of have any remaining questions, you can contact Grip Psychologen via info@grippsychologen.nl