

Job Ready. Always and Everywhere

Deftiq Privacy Policy EN Version August 2025

Privacy Policy

Last updated on 08-2025

1 Introduction

1.1 This Privacy Policy describes how Deftiq B.V. ("Deftiq", "we", "us") collects, uses, shares and protects personal data when you use our services and websites. We explain what data we process, the purposes for which we do so, the grounds on which it is based and your rights as a data subject. At Deftiq B.V., we take the protection of personal data seriously. In this Privacy Policy, we explain what data we collect, how we process it and what rights data subjects have.

1.2 In the event of a conflict between documents, the following order of precedence applies: (1) the individual Agreement, (2) the General Terms and Conditions, (3) the Data Processing Agreement, (4) the Privacy and Cookie Policy, (5) the Terms of Use and Hosting. Together, these terms constitute the legal framework for the use of our Services.

1.3 Definitions

- A. Deftiq: Deftiq B.V., having its registered office in Rotterdam, Hofplein 20, 3032 AC Rotterdam, registered with the Chamber of Commerce under number 97997455, accessible via info@deftiq.com.
- B. Platform: the online learning and training environment of Deftiq, accessible via www.deftiq.com, app.deftiq.com or other domains designated by Deftiq.
- C. Administrator: the organisation or employer that deploys the Platform for training and is responsible for its deployment and management.
- D. Participant: the natural person attending training courses or participating in examinations via the Platform.
- E. User: any natural person who has access to the Platform, including Administrators and Participants.
- F. Data Processing Agreement: the agreement setting out arrangements for the processing of personal data by Deftiq on behalf of the Administrator.

2 Deftiq's role as processor

- 2.1 Data controller for own operations: Deftiq B.V., Hofplein 20, 3032 AC Rotterdam, KvK 97997455, info@deftiq.com.
- 2.2 Processor for platform use: When using the Deftiq platform, Deftiq only acts as processor on behalf of the Administrator (the organisation deploying the platform).

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- 3.1 Data collected from Administrators: first name, last name, email address, company details, preferences and log data.
- 3.2 Data collected from Participants: first name, last name, email address, account details, learning outcomes and communications.
- 3.3 Automatically collected data: IP address, browser information, sessions and log files.
- 3.4 Optional data collected : proctoring may take place for specific exams. Recordings are kept for a maximum of 30 days.
- 3.5 Data may also be collected via cookies and analysis tools conforming to our Cookie Policy.

4 Purposes and Grounds

- 4.1 Deftiq processes personal data for delivery and support of the platform (performance of agreement, Art. 6(1b) AVG).
- 4.2 For communication and customer service purposes, Deftiq uses data based on consent or our legitimate interest.
- 4.3 For security, maintenance and improvement of the platform, Deftiq processes data based on legitimate interest.
- 4.4 Deftiq processes data when required by law (Art. 6(1c) AVG). 6(1c) AVG).
- 4.5 Deftiq's services are not targeted at children under the age of 16. Deftiq does not knowingly collect data from children. In the unlikely event that it does, Deftiq deletes that data.

5 Roles and responsibilities

- 5.1 Deftiq as processor: when using the platform, Deftiq processes personal data only according to the instructions of the Administrator. These arrangements are set out in the Data Processing Agreement.
- 5.2 Deftiq as Controller: for its own business operations, including billing, administration, security and communication.
- 5.3 Administrator: responsible for all processing that takes place outside the platform, such as export, local use or interfacing with own systems.

- 6.1 Deftiq works with carefully selected sub-processors, such as DigitalOcean (hosting) and Cloudflare (security).
- 6.2 When transferring data outside the EEA, Deftiq ensures appropriate safeguards, such as EU standard clauses (SCCs).

7 Security

- 7.1 Deftiq implements technical and organisational measures in accordance with ISO/IEC 27001 and OWASP guidelines.
- 7.2 Deftiq takes appropriate measures to protect data but cannot guarantee complete security. Users are solely responsible for secure use of their accounts and login details.

8 Retention periods

- 8.1 Accounts: as long as active + maximum 30 days after termination.
- 8.2 Customer service: 2 years after last contact.
- 8.3 Administration: 7 years in accordance with tax retention obligations.
- 8.4 Proctoring: maximum 30 days after assessment.
- 8.5 Log files: 12 months, unless longer necessary.

9 Rights of data subjects

- 9.1 Data subjects have the right to inspection, correction, deletion, restriction, portability and objection to processing.
- 9.2 Consent may be withdrawn at any time, without prejudice to the lawfulness of processing prior to withdrawal.
- 9.3 Requests can be made at info@deftiq.com. Deftiq will respond within one month (no later than three months for complex cases).
- 9.4 Where Deftiq acts as a processor, Deftiq supports the Administrator in the processing of requests.
- 9.5 Deftiq does not make decisions based solely on automated processing with a substantial impact on data subjects

10 Cookies

10.1 For information on cookies and tracking, Deftiq refers to the Cookie Policy.

10.2 Cookies are used for session management, analysis and improvement of user experience.

11 Complaints

11.1 Data subjects may submit complaints to the Personal Data Authority (www.autoriteitpersoonsgegevens.nl).

12 Amendments

12.1 Deftiq reserves the right to amend this policy. The most recent version will always be published at www.deftiq.com.

13 Contact

13.1 Deftiq B.V., Hofplein 20, 3032 AC Rotterdam, info@deftiq.com.