Privacy Statement

Birdwatcher Group– Public Trainings Programme (Intelligence Nest)

1. Introduction and scope

This Privacy Statement explains how **Birdwatcher Group** ("Birdwatcher Group", "we", "us") processes personal data in connection with the courses, workshops and training programmes organised by us ("Trainings"), in accordance with the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (Uitvoeringswet AVG). It applies to the personal data of the persons or contact persons of organisations that book a Training, including employers that register employees ("Clients"), the persons who attend a Training ("Participants"), newsletter subscribers, website visitors and other individuals we interact with in this context.

2. Data controller

Birdwatcher Group is the data controller for the processing activities described in this Privacy Statement, unless stated otherwise below (see section 6 for the role of third parties).

3. Personal data, purpose and legal basis

The overview below shows, for each purpose, which data we process, on what legal basis, how long we retain it, and with whom we share it.

The Agreement is the agreement between us and the Client or the Participant for the delivery of a Training.

Data processing activity	Personal Data	Purpose	Legal basis	Retention period	Recipients
Managing Training and Participants Records	Name, email address, phone number, job title, employer, Training booked, dates, attendance Data subject: Participant	Organisation and delivery of the Training	Legitimate interest (if the Agreement is concluded with the Client): performing the Agreement (Art. 6(1)(f)) GDPR; Performance of the Agreement (if the Agreement is concluded with the Participant (Art. 6(1)(b) GDPR)	Duration of the Training plus 12 months (aftercare and follow-up questions)	Guest/freelance trainers and partner organisations (see section 6); Client where an employer registers the Participant
Sending invoices and maintaining financial records.	Billing details, payment status, payment information Data subject: Participant, Client contact person	Invoicing and payment of Trainings	Performance of the Agreement; legal obligation (Art. 6(1)(b) and (c) GDPR)	7 years (statutory tax retention obligation).	Payment provider, accountant/bookkeeper
Corresponding and handling complaints	Emails and messages, content of complaint or request Data subject: person sending correspondence of lodging complaint	Customer service and compliant handling	Legitimate interest: good service and complaint handling (Art. 6(1)(f) GDPR)	12 months after resolution	Internal only; IT/email service providers where applicable

Data processing activity	Personal Data	Purpose	Legal basis	Retention period	Recipients
Registering professional back-ground information	Short description of career or context, provided by the Participant Data subject: Participant	Organisation and delivery of the Training	Consent (Art. 6(1)(a) GDPR); withdrawable without consequences for participation	Deleted within [30] days after the last training day of the relevant cohort	Trainers of the relevant Training
Registering example cases	Example cases voluntarily provided by the Participant (see section 5) Data subject: Participant; persons mentioned in example cases	Organisation and delivery of the Training, including cases.	Consent (Art. 6(1)(a) GDPR)	Deleted within [30] days after the Training	Trainers and fellow Participants where needed for the exercise
Maintaining certificate records	Name, Training completed, date of completion Data subject: Participant	Providing information about completed Trainings	Legitimate interest (if the Agreement is concluded with the Client) (Art. 6(1)(f)) GDPR; Performance of the Agreement (if the Agreement is concluded with the Participant (Art. 6(1)(b) GDPR); Legitimate interest in being able to verify a certificate afterwards (Art. 6(1)(b) and (f) GDPR)	5 year retention period for certificate records.	Participant; Client (confirmation of completion only)
Sending newsletters	Email address, subscription status	Direct marketing	Consent (Art. 6(1)(a) GDPR)	Until consent is withdrawn; inactive subscribers are removed after [24] months without interaction	Newsletter platform provider (processor)
Performing evaluations	Evaluations, aggregated participation data	Evaluating and Improving Trainings and safeguarding a safe learning environment	Legitimate interest (Art. 6(1)(f) GDPR)	Anonymised, or at most [24] months	Internal only
Managing website and cookies	IP address, cookie identifiers, usage data, standard visitor analytics	Ensuring website functionality and cookie consent (marketing/tracking cookies).	Consent (Art. 6(1)(a) GDPR). Legitimate interest (Art. 6(1)(f) GDPR)	See cookie overview	See cookie overview

We do not process more personal data than is necessary to organise and deliver the Trainings. Where possible, we apply anonymisation or pseudonymisation.

The Trainings are not intended for persons under the age of 18.

Legitimate interest and the right to object

Where we rely on a legitimate interest, that interest is: handling questions and complaints, improving our Trainings, ensuring a safe learning environment, and being able to verify issued certificates. You have the right to object to this processing (see section 10).

4. Provision of data, sources and automated decisions

- **Mandatory or voluntary:** the data for registration, invoicing and certificates is necessary to perform the Agreement. Without it, we cannot register you or issue a certificate. The professional background, example cases and newsletter subscription are voluntary.
- **Sources:** we generally receive data directly from you. If your employer or another Client registers you, we receive your name, email address and job title from that Client.
- **Automated decision-making:** we do not make decisions based solely on automated processing or profiling that significantly affect you.
- **Photo and video recordings:** we do not record or photograph Trainings without your prior, explicit consent.

5. Data Sharing and Third Parties

We share personal data only with parties that have a lawful and necessary reason to access it, and never with colleagues or third parties without a justified reason. We enter into the applicable arrangements with the third party, such as a data processing agreement, joint controllership arrangement or confidentiality agreement. Third parties we may share data with are:

- Newsletter platform (Mailchimp),
- IT and email service providers (Microsoft)
- Accounting firm
- Payment provider (Mollie)
- Guest and freelance trainers
- Partner organisations for jointly delivered Trainings
- Judicial or law enforcement authorities

Employer or other Client

If the Client (eg. your employer) registers you, the Client may learn which Training you attended or completed. The basis is and our legitimate interest in meeting our contractual obligations. We do not share your assessment, your progress, your correspondence with us, your professional background or the content of practical exercises with the Client, unless you consent to this.

Trainers

Trainer names are not always publicly listed and are only shared with enrolled Participants to the extent necessary for participation in the Training.

6. International transfers

We do not transfer personal data outside the European Economic Area (EEA) unless appropriate safeguards are in place, such as an adequacy decision of the European Commission (for example the EU-US Data Privacy Framework for participating providers) or the European Commission's Standard Contractual Clauses.

7. Technical and Organisational Security Measures

We apply appropriate technical and organisational measures, including:

- encryption of sensitive data in transit and encryption of confidential data in transit and at rest;
- access to systems and records on a need-to-know basis, with role-based authentication, multi-factor authentication, and logging;
- use of a password manager and no unattended access to sensitive data;
- encrypted storage or email for confidential documents and no processing of data over unsecured networks;
- secure, multi-factor access-controlled storage of physical files;
- backups, periodic review of access rights and a security awareness programme for staff.

8. Retention and deletion

The retention periods per category are set out in the overview in section 3. We do not retain data longer than necessary for the purpose for which it was collected or than legally required. At the end of the retention period, we delete the data or anonymise it. Retention periods are reviewed periodically.

9. Your rights

You have the following rights:

- access to your personal data;
- rectification and erasure (the “right to be forgotten”);
- restriction of processing;
- data portability;
- objection to processing based on a legitimate interest;
- withdrawal of your consent at any time. This does not affect the lawfulness of processing carried out before withdrawal.

You can submit a request in writing to the DPO (see section 2). We will respond within one month. If your request is complex, we may extend this period by up to two further months; we will inform you of this within one month. We may ask for proof of identity, and requests may be lawfully denied where an exemption applies.

Complaints: if you disagree with how we handle your data, please contact us first. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, autoriteitpersoonsgegevens.nl).

10. Data breaches

Where required by law, we will notify the Dutch Data Protection Authority within 72 hours of becoming aware of the breach, unless it is unlikely to pose a risk to the rights and freedoms of individuals. Where there is a high risk, we will inform those affected without undue delay.

11. Cookies

Our Website (Company | Birdwatcher Group) uses the following cookies and similar technologies.

- **Functional cookies** are necessary for the Website to work (for example remembering registration form progress or security settings). No consent is required for these cookies.
- **Analytical cookies** are used to understand how the Website is used. If they are configured to have little impact on your privacy (no combination with other data, no sharing with third parties for their own purposes and an anonymised IP address), we place them without

consent. If they can track visitors across sessions or websites, we only place them with your consent.

- **Marketing and third-party cookies** (for example from social media or advertising providers) are only placed with your prior consent via the cookie banner.

You can change your choice at any time via the cookie settings on the Website, and manage or delete cookies through your browser. Declining non-essential cookies does not affect core functionality, such as registering for a Training. Where a cookie involves personal data (such as an IP address), the retention periods and transfer safeguards in this Privacy Statement apply.

Cookie	Purpose	Type	Retention	Party
_cfuvid	Set by Cloudflare to tell apart visitors sharing an IP address, for rate limiting and protection against abuse and bots.	Functional	Session (deleted when the browser closes)	Third party (Cloudflare)
_ga	Assigns a random ID to each browser so Google Analytics can count unique visitors and returning visits.	Analytical	13 months (400 days)	Third party (Google)
_ga_GDTFCLM5EL	Stores session state (session count and timing) for our Google Analytics 4 property.	Analytical	13 months (400 days)	Third party (Google)
_gcl_ls (local storage)	Stores the load status of Google's tag. Belongs to Google's advertising and conversion-measurement features.	Marketing	About 1 day	Third party (Google)

12. Contact

If you have questions or complaints regarding the processing of your personal data, you may contact our Data Protection Officer.

Tim Bosch

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13. Changes

This Statement is reviewed periodically. The most recent version is available on the Website.

Last Revised: 07-10-2026