

Privacy statement

1. Introduction

This is the MijnOefening Privacy Statement. This Privacy Statement provides information on the processing of your personal data by Mijn Oefening B.V. and its group companies (hereafter MijnOefening, we or us) pursuant to the EU General Data Protection Regulation (GDPR). Data protection and privacy laws of the country where you live, or your therapist is located, may result in the applicability of other or additional privacy rules and regulations.

The primary purpose of this Privacy Statement is to be a dynamic resource and tool so that we can offer our services to you in the best possible way. We want you to feel secure when visiting our site and app and are committed to maintaining your privacy when doing so.

This Privacy Statement may be changed over time. The most up-to-date Privacy Statement is published on our website and app. This Privacy Statement was last changed on 24 March 2020. You can store or print this Privacy Statement by using the buttons at this page.

2. When does this privacy statement apply?

This Privacy Statement is applicable to the processing by MijnOefening of all personal data of the visitors of its website and app. MijnOefening B.V. is a limited liability company under Dutch law providing an exercise platform for therapists, patients and other visitors.

3. Who is responsible for your personal data?

MijnOefening and/or its group companies are the controllers of the processing of all personal data that fall within the scope of this Privacy Statement. This Privacy Statement indicates what personal data are processed by MijnOefening and for what purpose, and to which persons or entities the data will or may be provided. MijnOefening may share your personal data with third parties.

4. For which purposes do we process your personal data?

We store and process your personal data on behalf of therapists. The therapist acts as the data controller under the GDPR. MijnOefening may act as data processor within the meaning of the GDPR for the processing of personal data on behalf of the therapist, depending on the terms of business between MijnOefening and the therapist. Please contact your therapist to learn about the processing of your personal data and their policies in this respect.

MijnOefening may also process your personal data for its own purposes and in that case, it acts as data processor under the GDPR. MijnOefening processes payments by therapist, account information and visitor data as set out below.

To use the platform of MijnOefening, you have to create an account providing your name, e-mail addresses, telephone number, date of birth and data you may have included to report on your exercises, and you can upload your profile picture (non-mandatory). We process your account information on our legitimate interest to adequately provide you with the services of our platform. Account details are not visible to third parties. With respect to video consulting, MijnOefening processes the duration of the video consult with your therapist and the end and start time of the video consult.

Only the therapist who send their patients an invitation to visit the platform can see the account details of their patients, the exercise program provided and the compliance with the program of their patients and the experiences with the exercises of their patients. MijnOefening stores this information on behalf of the therapist. These personal data will only be processed by MijnOefening with consent of the patient. After consent is given, MijnOefening may anonymise these data and share it with authorised third parties.

We may process your personal data in order to assess, analyse and improve our services. We may use aggregated personal data to analyse customer behaviour and to adjust our services accordingly. When you use MijnOefening services, enter or search data through the website or app; we may also process your personal data to compile analytics reports to adjust our services accordingly, to ensure that it is relevant to you.

Your personal data will be deleted from our systems after 1 year or longer in accordance with local mandatory law or statutory requirements after the relationship with that person ended.

5. Cookies

We also collect information through the use of cookies. Cookies are small files of information which save and retrieve information about your visit the website or app of MijnOefening. These cookies are necessary for the functionality of the website or app.

6. Who has access to your personal data?

Your personal data may be exchanged with the MijnOefening shareholders and associated companies for administrative purposes. We may also exchange your data in order to offer you a complete package of services. MijnOefening may use sub-processors to process your data in which case MijnOefening will enter into data processing agreements with these sub-processors.

We will only share your personal data with third parties if specific consent is given to share such information with the third party (e.g. an insurance company), if we are obliged to share information with a healthcare provider based on an agreement or to defence our rights. Active sub-processors and relevant third parties are listed in annex A.

If your personal data are transferred to a recipient in a country that does not provide an adequate level of protection for personal data, we will take measures to ensure that your personal data are adequately protected, such as entering into EU Standard Contractual Clauses with these third parties.

In other cases, your personal data will not be supplied to third parties, except where required by law.

7. How are your personal data secured?

MijnOefening has taken adequate safeguards to ensure the confidentiality and security of your personal data. MijnOefening has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. Examples are: fully encrypted communication between MijnOefening and our users (SSL for browsers and TLS for emails), use of secure servers (encrypted automatic back-up systems on and off site), prevent abuse of IP database with IP blacklists, require all users to choose strong passwords, two factor authentication (via e-mail or sms) and staff training.

8. Questions or requests for access, correction and removal

You can access, correct or remove the data that MijnOefening processes about you at any time by accessing your account. We will provide a deletion functionality, such that you can delete your account yourself within a two weeks' notice. We will retain your personal data as long as your account is active or needed to provide services, resolve disputes or comply with obligations pursuant to laws and regulations.

Should you have any questions regarding the processing of your personal data, please contact support@mijnoefening.nl.

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.

Annex A – sub-processors/relevant third parties

Sentry

We use Sentry for error monitoring. Sentry is used to send detailed crash reports to the sentry servers when the app crashes, such that we get insight that the crash occurred and that we are able to prevent further crashes.

Transip

Transip houses our servers along with our databases. These servers are all housed in the Netherlands.

Mollie

Mollie is a payment API that is used for recurring payments of the manager. It does not process any data but is only invoked for payment orders.

G-suite

MijnOefening uses a G-suite account for support emails.

Twilio & Twilio's Sendgrid

We use the SMS messaging API from Twilio. This API is used to send SMS messages for our two factor authentication system. It does not process any data but only executes our orders. We also use another service from Twilio, their SendGrid Email API. This API is used to send emails to users, such as notifications and two factor authentication emails.

Voxeet

We use VoIP-webconferencencesoftware from Voxeet for video consulting.

Google reCAPTCHA

We use CAPTCHA service to protect our website from spam and abuse.