



# **AIC – Amsterdam International Community**

## **Privacy Policy**

\* AIC is a registered trademark (commercial name) of NIC & AIC VOF

## INDEX

Premise .....	3
1. Definition.....	3
2. Introduction .....	4
3. AIC details.....	4
4. Use of your personal data.....	4
4. Providing your personal data to others .....	7
5. Retaining and deleting personal data .....	7
6. Amendment .....	7
7. Your rights.....	8
8. About cookies.....	10
9. Cookies, tracking and analytics used by us and our services providers .....	10
10. Managing cookies .....	11

## **Premise**

Welcome to AIC – Amsterdam International Community!

AIC organization (hereinafter AIC) is active to organize social events that connect expats and locals in the region of Amsterdam. AIC supports also the expats community providing lifestyle tips, networking opportunities and services through its social media, website and social (virtual or in-person events) events.

This Privacy Policy - under the conditions here in after laid down - explains how AIC collects and uses personal data of our website visitors, service users accessing or visiting or using our website ([www.nicexpat.nl](http://www.nicexpat.nl)), social media, services, or interacts with AIC by attending virtual or in-person events.

## **1. Definition**

In accordance with Art.4 of GDPR the following definitions apply:

- 1.1 ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.2 ‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 1.3 ‘restriction of processing’ means the marking of stored personal data with the aim of limiting their processing in the future;
- 1.4 ‘profiling’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 1.5 ‘controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 1.6 ‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 1.7 ‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry

in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- 1.8 'we', 'us' and 'our' refer to NIC&AIC or AIC. For more information about us, ref. to Section 3.

## 2. Introduction

- 2.1 This policy applies where we act as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 2.2 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 2.3 We value your trust highly, acts in a transparent manner, treats your personal data very consciously and are committed to protect the privacy of our website visitors and service users to the highest standards of security.

## 3. AIC details

- 3.1 AIC is a registered trademark (commercial name) of NIC&AIC VOF;
- 3.2 This website is owned and operated by NIC & AIC VOF;
- 3.3 We are registered in the Netherlands under KvK number 74439200 and VAT number NL859899640B01;
- 3.4 You can contact us:
- a) by using our website Contact form <https://nicexpat.nl/contact>
  - b) by using the following email address: [ciao@nicexpat.nl](mailto:ciao@nicexpat.nl)

## 4. Use of your personal data

In this Section are set out:

- a) the general categories of personal data that may processed by AIC;
  - b) in the case of personal data that AIC did not obtain directly from you, the source and specific categories of that data;
  - c) the purposes for which AIC may process personal data; and
  - d) the legal bases of the processing.
- 4.1 AIC may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website

navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is AIC's legitimate interests, namely monitoring and improving our website and offering a better service to users.

- 4.2 We may process your account data ("**account data**"). The account data may include your name, email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us/a third party (at your request), to enter into such a contract generally for the supply of services.
- 4.3 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us or you/a third party (at your request), to enter into such a contract generally for the supply of services.
- 4.4 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details, employment details. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us or you/a third party (at your request), to enter into such a contract generally for the supply of services.
- 4.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us or you/a third party (at your request), to enter into such a contract generally for the supply of services.
- 4.6 We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The source of the transaction data is you and/or our payment services provider. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us/third party (at

your request), to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

- 4.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us/third party (at your request), to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 4.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 4.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.11 We may process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 4.12 Please do not supply any other person's personal data to us, unless we prompt you to do so.
- 4.13 AIC Newsletter: You can subscribe to our newsletter during the registration process at [www.nicexpat.nl/registration](http://www.nicexpat.nl/registration). By subscribing you agree to be regularly informed about our events, tips, invitations to surveys, potential partnerships with third parties, new services release, etc. Your consent can be revoked at any time via the email address [ciao@nicexpat.nl](mailto:ciao@nicexpat.nl). Your data will be stored and used until you revoke your consent.
- 4.14 Email Advertising: During the registration process at [www.nicexpat.nl/registration](http://www.nicexpat.nl/registration) we will ask your explicit consent to subscribe to the AIC email newsletter. Our newsletter will inform you about our events, new services releases, partnerships, promotions, discounts, marketing campaigns, etc. Your data will be stored and used EITHER as long as the advertising purpose exists OR upon receipt of your objection to the processing of your data for advertising purposes OR in any case as soon as your consent is revoked.

## **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to our insurers and/or professional advisers or service providers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 4.2 Financial transactions relating to our website and services are OR may be handled by our payment services providers (WooCommerce). We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at [www.woocommerce.com](http://www.woocommerce.com)
- 4.3 We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 4.4 We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. Retaining and deleting personal data**

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data - Article 5(1)(e) of the GDPR-.

- 5.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for purposes for which the personal data are processed.
- 5.2 We will retain your personal data for as long as you have an active account on our website [www.nicexpat.nl](http://www.nicexpat.nl)
- 5.3 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendment**

- 6.1 We may update this policy from time to time by publishing a new version on our website.

- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We may notify you of significant changes to this policy by e-mail.

## 7. Your rights

In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

- 7.1 Your principal rights under data protection law are:
  - (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;
  - (e) the right to object to processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 7.2 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by visiting below link when logged into our website:  
[www.nicexpat.nl/arm\\_login/?arm\\_redirect=http%3A%2F%2Fnicexpat.nl%2Farm\\_e\\_dit\\_profile%2F](http://www.nicexpat.nl/arm_login/?arm_redirect=http%3A%2F%2Fnicexpat.nl%2Farm_e_dit_profile%2F)
- 7.3 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.4 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: [the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 7.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.6 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.8 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.9 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.12 You may exercise any of your rights in relation to your personal data by our website Contact section [www.nicexpat.nl/contact](http://www.nicexpat.nl/contact) or by email [ciao@nicexpat.nl](mailto:ciao@nicexpat.nl)

## **8. About cookies**

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies, tracking and analytics used by us and our services providers**

- 9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://support.google.com/analytics/answer/6004245?hl=en>. For more information on how Google Analytics uses user data, please refer to Google's privacy policy: <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 9.3 We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link](#). You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

- 9.4 We use Facebook Pixel in order to give our users a better experience and to know the people that use our services to show them relevant ads on Facebook. The data collected is anonymous and AIC does not have access to the unique identity of the users. However, this data is “fired” via the Pixel to Facebook who might process it to pinpoint to the respective user profile. Such data can be used for Facebook’s own advertising purposes and targeted advertisements could be displayed on and outside Facebook. We are not in control, nor liable of how Facebook uses your personal data. For more information about Facebook’s Privacy and data processing, please refer to the Facebook Privacy links:
- <https://www.facebook.com/about/privacy/>
  - <https://www.facebook.com/policies/cookies/>
  - <https://www.facebook.com/about/basics>

## 10. Managing cookies

- 10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- a) <https://support.google.com/chrome/answer/95647> (Chrome);
  - b) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - c) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari);
- 10.2 Blocking all cookies will have a negative impact upon the usability of our websites and you will not be able to use all the website features.