

# Data Privacy & Security Controls

This document outlines BolsterKracht's data privacy, protection, and security measures relevant to its services. BolsterKracht fully complies with the General Data Protection Regulation (GDPR) and applies strict organizational and technical controls to protect all personal data processed within the scope of our services.

## 1. GDPR Compliance

BolsterKracht processes personal data strictly in accordance with the GDPR. We only collect and process the minimum amount of data required to deliver coaching and training services.

Processing activities are based on a lawful basis such as contractual necessity or explicit consent. Personal data is never used for secondary or incompatible purposes.

## 2. Data Types and Purpose of Processing

BolsterKracht may process basic identification and contact details such as name, email address, telephone number, role, attendance, and planning-related information. These data are processed solely for scheduling, coordination, delivery of coaching and training sessions, administrative support, and progress reporting.

Where sessions are transcribed using an AI-supported coaching tool, this also includes the content of the coaching conversation itself. Recording only takes place with the coachee's prior, explicit consent, requested before each session; no session will be recorded without the coachee's knowledge, and consent which may be declined or withdrawn for any individual session. This data is used solely to support session preparation, follow-up, and continuity of the coaching relationship.

## 3. Confidentiality

All team members, coaches, and delivery partners working with BolsterKracht are bound by confidentiality obligations. Only authorized individuals with a legitimate business purpose can access participant data. Confidential information exchanged during coaching is handled with the highest degree of discretion and is never shared without consent.

## 4. Technical and Organizational Security Measures

BolsterKracht applies appropriate technical and organizational security measures to safeguard personal data, including:

- Enforced username and password protection on all systems.
- Two-factor authentication for systems containing sensitive data.
- Encryption and pseudonymization where appropriate.
- Regular secure backups in secure cloud services.
- Mandatory confidentiality for all employees, affiliated coaches, and partners.

## **5. Use of Sub-processors**

BolsterKracht works with a limited number of carefully selected partners for administrative support, ICT services, AI-supported transcription, AI-coaching support and coaching-match facilitation. All sub-processors operate under GDPR-compliant data processing agreements that specify responsibilities, confidentiality, and security measures. No personal data is shared with organizations that do not meet GDPR requirements. BolsterKracht remains the data controller under its data processing agreement with the AI sub-processor.

## **6. Data Transfers Outside the EU**

BolsterKracht does not transfer personal data to parties located outside the European Union. All processing and storage activities take place within the EU, ensuring compliance with GDPR jurisdictional safeguards.

## **7. Data Retention**

BolsterKracht retains personal data only for as long as necessary to fulfil contractual and legal obligations. Administrative and project-related data are typically retained for up to seven years in accordance with Dutch fiscal and statutory requirements. Coaching-related notes are retained only for the duration of the coaching relationship unless otherwise agreed with the client.

## **8. Data Subject Rights**

Under GDPR, participants have the right to access, rectify, delete, or restrict the processing of their personal data. They may also object to processing or request data portability. Requests can be submitted directly to BolsterKracht and will be handled promptly and in accordance with GDPR timelines.

## **9. Data Breach & Incident Management**

BolsterKracht maintains an incident response procedure to manage data breaches. Should a breach occur that poses a risk to individuals' rights or freedoms, BolsterKracht will notify the affected individual(s) and the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) without undue delay, in accordance with GDPR requirements.

## **10. Contact for Data Protection Matters**

For questions regarding this document or BolsterKracht's data protection practices, please contact:

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