

## Privacy statement for the “Johan Portal” on app.johan.nl

With the Johan Portal you can set to work on your sustainable employability or in your role within the organisation, to give shape to sustainable employability.

Johan takes your privacy very seriously. In this privacy statement you can read which data we store of you and for which purpose. The most important points have been listed by us in the summary below. We ask you to read this privacy statement before creating an account, to ensure that you are familiar with our terms and conditions.

### Summary

- With your Johan account you can get access to a range of products and services that may help you when it comes to sustainable employability. These products and services are usually offered to you through your employer, training institute or sector organisation. When you create a Johan account, this is always your choice. No one can oblige you to create an account. Which products and services you would like to use is also up to you. Your provider is not permitted to exert pressure on you to purchase or use products or services.
- The data that you collect or enter is yours and yours alone. As a rule, we do not share this data with anyone, not even with the party that offers you the account. If you share personal data (e.g. with a coach), you will always do this yourself and give the person in question your explicit permission for this through your Johan account.
- If you create a Johan account, we will ask you for your name, mobile telephone number and your (private) email address, among other things. We will use your mobile telephone number to secure your account (2-factor authentication).
- Your account is personal: it is yours and yours alone. You can always keep your account, during your entire career. Even if you no longer have a relationship with the party that offers you this account (for example when you leave the employment of your current employer). You always have the right to terminate your account.
- You always have access to data that is stored in the Johan portal and you can always modify it or have it modified in case it is not correct.
- It may happen that the party that offers you the Johan account wants to use anonymised data for group reporting, management information or scientific research. If this is the case, it will be set out in the terms and conditions / privacy statement. This concerns statistical information only. That information is always anonymous and can never be traced back to you.
- If the additional services in the Johan Portal apply terms and conditions of their own, we will expressly inform you about this at the time you are about to purchase or use those services. We think it important that additional services are in accordance with Johan’s privacy policy and require this from the suppliers concerned.
- If you create an account, we will do everything we can to store your data safely, to ensure that you are the only one who has access to it and no one else. For this purpose, we have taken various technical and organisational measures. Johan is ISO-27001 certified. This is the most important international information security standard. Twice a year, our security policy and all security measures are tested by an independent institute. We will send you the details of this audit at your request.

You can find your complete privacy statement below.

## 1. General

1. This privacy statement applies to the use of the website on <https://app.johan.nl>, hereinafter referred to as the “Johan Portal”.

2. Johan B.V. takes the privacy of its users very seriously. The information that we process with regard to you (hereinafter referred to as “personal data”) will therefore be handled and secured with the utmost care. This privacy statement is therefore intended to clarify to you – as a user of the Johan Portal – which personal data is collected and how we have made sure that this happens in the safest possible way.

3. Johan B.V. provides you with a personal account of which you personally are the owner. Creating a Johan account is your own choice.

Johan B.V. may offer the account actively because your employer, training institute or sector organisation (hereinafter referred to as the “PROVIDER”) wants to make you an offer for Sustainable Employability (SE) questionnaires, content and services which you can personally make use of. The PROVIDER may do this in cooperation with other providers. These providers are the suppliers of the aforementioned questionnaires, content and services (hereinafter referred to as “PRODUCTS”).

If a PROVIDER wants to offer you PRODUCTS, the name of the PROVIDER will explicitly be mentioned before you create an account. You can then decide for yourself whether you want to accept the PROVIDER’s offer and create an account. When you already have a Johan account, you can accept the PROVIDER’s offer using your existing Johan account.

Creating an account is voluntary. The PROVIDER is never allowed to force you to create an account.

4. Part of your personal account is your personal safe. This is a secured digital safe, in which your data is stored that you collect by using PRODUCTS. For example, the answers provided in a questionnaire, the advice of a professional, or measurements from a preventive medical examination (PME).

5. Johan B.V. is the controller within the meaning of the General Data Protection Regulation (GDPR) for the processing of your personal data required for making and keeping your personal account available (Which data this concerns can be found in Article 3.1.)

6. If you purchase or use PRODUCTS on the Johan Portal, personal data may also be collected using these PRODUCTS. This can be done in two ways: (1) because you enter this personal data yourself, for example as answers in questionnaires; (2) by professionals who add the personal data to your personal safe.

Unless stated otherwise in the privacy statement accompanying those PRODUCTS, Johan B.V., together with the provider of the PRODUCTS, is the controller for this personal data. Johan can act in this respect as an independent controller or as a joint controller, the latter in cooperation with the provider in question. This data is stored in your personal safe. (Which data this concerns can be found in Articles 3.6 and 3.7). For personal data that is collected through PRODUCTS, Johan B.V. will conclude an adequate agreement with each separate provider. In concrete terms, this means that you

can always turn to Johan for exercising your rights (such as, for example, access to your personal data, rectification, restriction of the processing, or removing your account).

7. If your PROVIDER has given your name and email address (and any additional personal data such as e.g. your position or department) to Johan B.V. with the aim of offering you a Johan account, Johan B.V. will act as a processor with regard to this personal data. For this purpose, Johan B.V. concludes a processing agreement with each separate PROVIDER, in which measures for the protection of your privacy and the required information security have been recorded. (Which data this is can be found in Articles 3.2 and 3.3 below).

8. Johan B.V. has its registered office at Debbemeerstraat 25, 2131 HE in Hoofddorp, the Netherlands, and has been listed in the trade register of the Chamber of Commerce under number 67386377. Questions about this Privacy statement can be asked via [privacy@johan.nl](mailto:privacy@johan.nl).

## 2. Consent for the processing of your personal data

1. This privacy statement applies to the processing of personal data that is voluntarily provided by you to Johan B.V. for creating your personal account and keeping it available.

2. To be able to use the Johan Portal, you give us your unambiguous consent for processing your personal data.

3. The basic principle is that the provision of personal data to us is not compulsory. You have at all times the choice whether or not to use the Johan Portal and whether you want to use the PRODUCTS offered via the Johan Portal. If you want to use the Johan Portal, you give us your explicit consent for processing your personal data.

4. An additional privacy statement may apply for the use of PRODUCTS. If additional conditions apply, they will explicitly be provided by the party whose PRODUCT you purchase or use, and your explicit consent will be required for the use of your personal data. An overview of the personal data that is collected and the purposes for which that data is used can be found in the privacy statement of the relevant PRODUCTS. If PRODUCTS are offered to you, you can decide for yourself if you want to make use of them.

## 3. What personal data do we store and for what purpose?

1. **Personal contact details.** For the registration of your personal account, you personally enter your first name, last name, date of birth, gender, mobile telephone number and the email address selected by you. We recommend that you use your private email address, to ensure that you can always keep your Johan account separate from your PROVIDER.

We use your mobile number to keep your account safe with the help of 2-factor authentication. (This is done with an additional check at login. The code is sent to you by text message or via another authentication method).

We use your name, date of birth, gender, mobile telephone number and email address to contact you and to verify your identity if you make a request for support. We will only contact you if this is necessary for the provision of the service(s). For example, when you submit a request for support, or if there are essential changes in the Johan Portal. Your email address will also be used in the context of our password recovery procedure.

Your date of birth and gender may be used for calculating the scores for various questionnaires in PRODUCTS. These scores can then be calculated without you having to share your date of birth and gender with the provider of the PRODUCTS. The provider of the PRODUCTS does not have access to the personal data you provide to us. And therefore not to your date of birth and gender either.

The purposes listed in this paragraph have been determined by Johan. Johan is the controller with regard to this data. For you this means that you can turn to Johan for exercising your rights as set out in Article 8.

**2. Business contact details.** Your PROVIDER enters a mailing list in the Johan Portal in which your first name, last name, (work) email address and possibly your department, position or other characteristics of you as an employee are stated. This data is used by your PROVIDER for inviting you to create a Johan account and for making you an offer of PRODUCTS. When you accept the PROVIDER, you can see which data this concerns. We recommend that you also take note of the PROVIDER's privacy statement beforehand. This statement must be offered to you by the PROVIDER through the Johan Portal. You will therefore be able to read the PROVIDER's privacy statement before you decide to accept the PROVIDER's offer.

**3. Who is offering the Johan Portal to you.** When you create a Johan account, we will store the name of the PROVIDER that has offered the account to you. We do this to enable the PROVIDER to make you an offer of the PRODUCTS it makes available to you.

**4. Login attempts.** When you visit the website, the Johan Portal registers a number of data in a logfile, including all login attempts, date and time, and your IP address. We do this to ensure that, if there is an attack, we can see where the attack came from. This data is not used for any other purposes.

Please note: Johan is the controller for the data listed in this paragraph. For the processing of IP addresses, Johan relies on the legitimate interest as referred to in Article 6, paragraph 1 under f GDPR.

**5. Cookies.** The Johan Portal uses functional cookies with a session ID to remember who has logged in and a technical cookie for the security of our website. No analytical cookies and/or tracking cookies are used within the Johan Portal. This is one of the measures that we have taken to guarantee your privacy with regard to clicking and surfing behaviour on the Johan Portal.

**6. Data that you enter independently when using the PRODUCTS.** For example: answers and scores in questionnaires about your vitality, development, career, performance, work stress, lifestyle, working conditions, health, etc. This data is stored to give you an insight into your performance.

If there are any additional purposes, they will be stated in the privacy statement of the supplier of the PRODUCT. You give your explicit consent to the processing of your data for these purposes when you

use a PRODUCT. That privacy statement is shown at the time you (first) purchase or use the PRODUCT.

Unless stated otherwise in the privacy statement accompanying the PRODUCT, Johan has determined the purpose of and the means for these processing operations together with the professional, and they are joint controllers with regard to this data. For you this means that you turn to both Johan and the professional concerned for exercising your rights as set out in Article 8. For the processing operations that fall under joint control, Johan B.V. will conclude a processing agreement of joint control with the relevant provider.

PRODUCTS that you activate / buy are registered by the supplier that offers the product. Your PROVIDER (employer, training institute and/or sector organisation) cannot see which PRODUCTS you purchase or use.

**7. Data added by professionals to your personal account.** When you purchase or use PRODUCTS in which professionals are involved, these professionals may add data to your personal account. This concerns advice and/or results provided by, for example, occupational health and safety experts, trainers, coaches, careers counsellors, psychologists, (para)medical professionals, etc. This may also concern physical measurements (blood pressure, blood values, heart rate, etc.) This data is stored with the aim of giving you an insight into your own performance.

Unless stated otherwise in the privacy statement issued by the professional, Johan has determined the purpose of and the means for these processing operations together with the professional, and they are joint controllers with regard to this data. For you this means that you turn to both Johan and the professional concerned for exercising your rights as set out in Article 8.

Please note: Professional only give advice if you have asked them for it. They will only receive data that you give them of your own account. When you purchase or use PRODUCTS in which professionals are involved, they may ask for your contact details or other information that they require for the performance of their job.

## 4. Purposes and data constraints

1. Personal data that you in principle add to the Johan Portal will only be used by Johan for creating your personal account and keeping it available, in accordance with the retention periods set out in Article 7 (“Retention period, return and destruction of personal data”).

2. Your PROVIDER does NOT have access to the personal data referred to in Article 3, except for the provisions of Article 3.2.

3. Your personal data will not be used for purposes other than listed in Articles 3 and 4.1.

4. The overarching objective of the processing of your personal data on the Johan Portal is the same for all PRODUCTS: to provide you with insight into your own sustainable employability and to offer

you opportunities to improve your own sustainable employability. When purchasing or using the PRODUCTS, personal data may be processed for an additional or more specific purpose. If this is the case, that purpose will be mentioned in the privacy statement accompanying the PRODUCTS.

5. Your PROVIDER may offer PRODUCTS that refer to external websites. If you are directed to an external website, this will be visible in the address bar of your browser: you are then no longer on johan.nl. Purposes of personal data collection by PRODUCTS purchased on an external website fall outside the scope of this privacy statement.

6. We do not store your clicking and surfing behaviour on our website. We do not use any tracking cookies or similar techniques. We do not share your personal data with third parties. We therefore do not provide any personal data to social media platforms either. We do not use Google Analytics or comparable techniques on our Johan Portal.

## 5. Third parties

1. We engage third parties in the performance of the services, namely service providers for sending emails, text messages and hosting the web application and all data. Insofar as these third parties process your personal data in the process, they do this in the capacity of processor for us. We will never share more personal data than strictly necessary in this context. (For example: for sending an email, only your email address will be used and nothing more.)

These third parties offer the same level of security as Johan applies itself. (See “security”.) We check periodically whether these service providers have taken the required technical and organisational measures to ensure that your personal data is processed in accordance with this privacy statement. An overview of these service providers can be found on [johan.nl/privacy](https://johan.nl/privacy).

2. We only provide your personal data to third parties who have nothing to do with the implementation of the Johan Portal (e.g. supervisors, authorities and government bodies) when we have a statutory obligation to do so, for example because of a court order.

3. As a rule, your data will not be shared with anyone else, unless you give your express and unambiguous consent for this via the account management in the Johan Portal.

## 6. Processing within the EU

1. Johan only processes your personal data within the European Union (EU). This is one of the measures that we take for the protection of your personal data. (See also the next article, about how we secure your personal data.)

2. Exceptions to this rule are your name and email address. We use an external service provider for sending email messages on an occasional basis. For this purpose, only your name and email address

may be processed outside the EU: the transfer does not apply to other personal data that we process of you. We have taken appropriate measures for this transfer, in order to warrant compliance with

the GDPR. These measures are based on the recommendations by the Dutch Data Protection Authority and consist of binding corporate rules, among other things.

## 7. Security

1. When processing personal data, we maintain at all times a level of security that, given the state of the art, is regarded as more than adequate in order to limit the risk of unauthorised access to, adjustment, disclosure or loss of personal data to an acceptable minimum.
2. Your data is exclusively stored by us on proprietary servers in highly secured data centres in the Netherlands. These Tier III data centres are at least ISO-27001, NEN7501 and ISO-9001 certified. The data centres are accountable to us with regard to their security by means of ISAE 3402 Type 1 and 2 reporting, among other things.
3. Johan B.V. is ISO-27001 certified. This is the most important international information security standard. At least once a year, an external audit of our security policy takes place. The details of our security policy can be requested via [privacy@johan.nl](mailto:privacy@johan.nl).
4. Extensive technical and organisational measures have been taken to protect the personal data and safeguard your privacy. The measures taken by Johan B.V. include, among others, double authentication, encryption of your data, logical and physical access control, time-out procedure, privacy dashboard, etc. The complete overview of all measures has been included in our “statement of applicability” that can be found on our support site.
5. If you are directed, by means of a link, from the Johan Portal to PRODUCTS outside the johan.nl domain, personal data may also be processed there. In that case, the security policy of Johan B.V. does not apply. We therefore recommend that you pay proper attention to this. We are not responsible or liable for any processing of data outside the Johan portal.

## 8. Retention period for personal data

1. As a user of the Johan Portal, you are yourself the owner of your personal account, the data required for keeping it active, and all personal data collected in it. You always have the right to remove your personal account and all data available in it yourself or have it removed by Johan B.V. (the right to be forgotten). Your personal account is yours and independent from the PROVIDER with which you are affiliated. In addition, you are at all times entitled to take your account and all data collected in it with you when you terminate your relationship with your current PROVIDER. For example, when you leave the service of your current employer that offered you the Johan account.
2. Johan B.V. retains your personal data for as long as your account is active. To keep your account active, you have to log in to your account at least once every two years. After two years of inactivity (meaning: not logging in), you will receive at several times an email and/or text message with a

request to check your details and keep your account active. If you do not respond to them, your account will be physically removed by us after some time. Your PROVIDER is not authorised to remove your personal account or have it removed.

3. Retention periods for data that you collect through the PRODUCTS of providers used by you are retained in accordance with the privacy statement of the provider that has made the relevant product or service available. Depending on their purpose, retention periods may vary for each PRODUCT. The applicable retention period is determined by the provider.

4. Data that is automatically logged by our web servers, as described in Article 3.4, will automatically be removed from our servers at regular intervals. This data will be retained for a maximum period of six months.

## 9. Your rights according to the GDPR

Johan B.V. acts in accordance with the requirements of the GDPR. This gives you the following rights.

- 1. Right to withdraw your consent.** As a user, you are yourself the owner of your personal data. When creating your Johan account, you gave us your consent for processing this personal data. You have the right to withdraw this consent. When you withdraw your consent, this means that we will remove your account and the personal data (as listed in Article 3) stored in it.
- 2. Right to access.** You can see in your personal account which personal data Johan B.V. has stored of you.
- 3. Right to rectification.** You have the right to adjust and supplement your data, or have it adjusted and supplemented. This right only pertains to facts about which - generally speaking - there can be no difference of opinion, such as, for example, your name or date of birth.
- 4. Right to erasure and 'to be forgotten'.** You have the right to have your data removed and 'to be forgotten' in this way.
- 5. Right to restriction of processing.** You have the right to temporarily suspend the processing of your data, for example if you feel that your data is incorrect or incomplete.  
Please note: you will not be able to use the Johan Portal during such suspension.
- 6. Right to object.** You have the right to object to specific forms of use of your personal data, for example if you feel that this data is incorrect or incomplete.
- 7. Right to data portability.** You have the right to transfer your data to another controller. This concerns data provided such as name and address details, answers given in questionnaires and/or measurements made. This data can always be viewed in your personal account.

**You can exercise your rights with us for all processing operations for which Johan B.V. is the sole or joint controller. You can do this by email ([support@johan.nl](mailto:support@johan.nl)), through our helpdesk (023-5680080), or by post (Johan B.V., Debbemeerstraat 52, 2131 HE Hoofddorp). We will then contact you for further identification.**



We will deal with your request as soon as possible. It goes without saying that we will do this within the applicable statutory periods.

For the processing operations for which a different party is the controller you can turn to that party for exercising your rights. For example, you can turn to the PROVIDER for the processing operations performed by your employer.

## 10. Amendments

1. Johan B.V. reserves the right to make amendments to this privacy statement. You can find the latest version of the privacy statement in your personal account. Johan will proactively inform you if there are major changes, so you will be able to agree to them or to opt for removal of your account (by yourself or by Johan B.V.)
2. Policy changes in the privacy statement of the supplier of PRODUCTS fall outside the scope of Johan B.V. In its agreements with suppliers, Johan has included a provision stating that they are obliged to inform you if amendments are made to their privacy statement.

## 11. Reporting incidents or complaints

1. If you feel that Johan B.V. fails to comply with this privacy statement, you can report this to our Data Protection Officer via [privacy@johan.nl](mailto:privacy@johan.nl) or via the address below. In that case, you will be contacted as soon as possible to ensure that the problem is considered and resolved. The Data Protection Officer has an independent position and will always accept your complaint.
2. You can also contact the Dutch Data Protection Authority and report the complaint via [Contact us | Autoriteit Persoonsgegevens](#).
3. If you feel that your PROVIDER or another provider fails to comply with the basic principles of this privacy statement or its own privacy statement, we would like you to report this to us via [privacy@johan.nl](mailto:privacy@johan.nl). We have concluded an agreement with all parties offering PRODUCTS on the Johan Portal to ensure that everything has been arranged properly and safely for you. In the unlooked-for event that this is not the case, we also have an interest of our own in taking action.

## 12. Contact

If at any time you want to contact us with comments or questions about this privacy statement, you can do this via [privacy@johan.nl](mailto:privacy@johan.nl). We are always looking for ways to improve. Feel free to share your comments or concerns with us.

Johan B.V.  
Debbemeerstraat 25  
2131 HE Hoofddorp, the Netherlands  
Chamber of Commerce: 67386377

T: +31 (0)23-5680080  
E: [privacy@johan.nl](mailto:privacy@johan.nl)