

## PRIVACY STATEMENT

### Transitionstudio

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### 1. General information

Transitionstudio takes your privacy seriously. We process personal data when you use our website, our services or surveys, or because you have provided this data to us yourself.

Under the General Data Protection Regulation (GDPR), Transitionstudio is the controller for the processing of personal data via our website (transitionstudio.global), our individual survey platform (individual.transitionstudio.global) and our team survey platform (tools.transitionstudio.global).

All data you make available to Transitionstudio is used solely in accordance with the GDPR and with due care.

### 2. Personal data we process

#### 2A. Via the website, when you make an online purchase:

- First and last name
- Address details (including billing address if different)
- Email address
- Phone number

#### Google Analytics, depending on the cookies you accept or decline:

- Data about your activities on our website
- IP address and device type
  
- Other personal data you actively provide (e.g. via contact form)

#### 2B. Via our surveys

- Name
- Email address
- Team name or team composition (for team surveys)
- Survey responses
- Other personal data you actively provide when completing a survey

### 3. Special and/or sensitive personal data

Survey users may enter personal data in open answer fields for clarification purposes. This information is treated as confidential and is used exclusively by Transitionstudio internally for analysis of survey results. It is never shared.

Our website and services are not directed at visitors under the age of 16. We do not knowingly collect data from minors. We recommend that parents and guardians be involved in the online activities of their children. If you believe we have collected personal data from a minor without consent, please contact us at info@transitionstudio.global. We will delete such data immediately.

#### 4. Purposes and legal bases

We process your personal data solely for the purposes listed below and on the basis of the legal grounds indicated (GDPR art. 6).

Purpose	Legal basis (GDPR art. 6)	Data
Processing your payment	Performance of contract (art. 6.1.b)	Name, address, email, billing data
Sending newsletter or offer	Consent (art. 6.1.a)	Email address, name
Following up on a request or form submission	Legitimate interest (art. 6.1.f)	Name, email, phone
Conducting and processing individual surveys	Performance of contract (art. 6.1.b)	Name, email, responses
Conducting and processing team surveys	Performance of contract with client (art. 6.1.b)	Name, email, team, responses
Analysing website behaviour to improve our website	Legitimate interest (art. 6.1.f)	IP address, behavioural data
Legal obligations (e.g. tax administration)	Legal obligation (art. 6.1.c)	Name, address, billing data

#### 5. Retention periods

Transitionstudio retains your personal data no longer than strictly necessary for the purpose for which it was collected. We apply the following retention periods:

Category	Retention period	Reason
Personal data of survey participants (name, email, responses)	2 months after delivery of the report	Shortest possible period; no longer needed after report verification
Contact details (registration for activities, workshops, training)	6 months after the activity ends	Invoice verification, participant lists, contact regarding changes
Newsletter subscribers	Until unsubscription	Subscription fulfilment
Financial and accounting data	7 years	Statutory retention obligation (tax legislation)
Payment data (transactions via Mollie)	7 years	Dutch statutory fiscal retention obligation

For information about the retention period in your specific situation, please contact us at [info@transitionstudio.global](mailto:info@transitionstudio.global).

#### 6. Anonymity and group reporting in team surveys

In team surveys, Transitionstudio never shares individual responses, scores or analyses with anyone other than the team members involved. Results are reported exclusively at team level.

## 7. Processors and third parties

Transitionstudio does not sell your data to third parties. We only share personal data with third parties where necessary for the performance of our agreement with you, or to comply with a legal obligation.

With all parties that process personal data on our behalf, we enter into a data processing agreement (DPA) to ensure an equivalent level of security and confidentiality.

We use the following (sub-)processors:

Party	Role	Location	DPA status
Wiselink SRL	Software development survey platforms	Romania (EEA)	DPA in place
Mollie B.V.	Payment processing	The Netherlands (EEA)	Processed in accordance with own GDPR policy
MailBlue / ActiveCampaign	Email marketing and transactional email	EU data centre (EEA)	DPA in place
WooCommerce / Automattic	Webshop	EU data centre (EEA)	DPA in place
Snelstart	Accounting	The Netherlands (EEA)	Automatically via general terms and conditions
Google (Analytics)	Website analytics	EEA / US (SCCs)	DPA via Google account
Buro Staal	Website development and management	The Netherlands (EEA)	Automatically via general terms and conditions

## 8. Cookies

Transitionstudio uses cookies. A cookie is a small text file stored on your device when you first visit our website. We use the following types of cookies:

- Functional cookies — necessary for the proper functioning of the website (e.g. remembering preference settings). These cookies are placed without your consent.
- Analytical cookies — for tracking website visits and improving our services (e.g. Google Analytics). These are only placed with your prior consent.

On your first visit to our website, we ask for your consent for non-functional cookies. You can change your cookie preferences at any time via our website. For more information, see our cookie statement.

## 9. Security

Transitionstudio takes the security of your data seriously and implements appropriate technical and organisational measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification.

Our website uses SSL encryption (HTTPS). You can recognise this by the padlock symbol in your browser and https:// in the URL. All sections where you enter data are secured with SSL.

If you suspect that your data is not properly secured or you notice signs of misuse, please contact us directly at [info@transitionstudio.global](mailto:info@transitionstudio.global).

## 10. Your rights

Under the GDPR, you have the following rights regarding your personal data:

- Right of access (art. 15 GDPR) — you may request a copy of the data we process about you.
- Right to rectification (art. 16 GDPR) — you may request correction of inaccurate data.
- Right to erasure (art. 17 GDPR) — you may request deletion of your data.
- Right to restriction (art. 18 GDPR) — you may request a limitation of processing.
- Right to data portability (art. 20 GDPR) — you may request your data in a structured format.
- Right to object (art. 21 GDPR) — you may object to processing based on legitimate interest.
- Right to withdraw consent — where processing is based on consent, you may withdraw it at any time.

To submit a request, send an email to [info@transitionstudio.global](mailto:info@transitionstudio.global), including a copy of your identity document. Please redact your photo, passport number and citizen service number (BSN) to protect your privacy.

Transitionstudio will respond as soon as possible, and within one month at the latest.

## 11. Complaints

If you have a complaint about the way we process your personal data, please first contact us at [info@transitionstudio.global](mailto:info@transitionstudio.global). We will be happy to resolve this together.

You also have the right to lodge a complaint with the Dutch Data Protection Authority:

Autoriteit Persoonsgegevens  
Bezuidenhoutseweg 30 · 2594 AV The Hague  
[www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

## 12. Changes

Transitionstudio reserves the right to amend this privacy statement. Please check this statement regularly. We will actively notify you of any material changes, for example by email or a notification on our website.

## 13. Contact and controller

For questions about this privacy statement or about the processing of your personal data, please contact:

Transitionstudio  
Attn: GDPR Controller  
Middelberterweg 48  
9723 EW Groningen  
E-mail: [info@transitionstudio.global](mailto:info@transitionstudio.global)  
Website: [transitionstudio.global](http://transitionstudio.global)