

PRIVACY POLICY THE INTERNATIONAL ACADEMY OF OSTEOPATHY

We value your right to data protection and make every effort to process your personal data in accordance with the applicable data protection legislation, including the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and national implementing legislation.

In this Privacy Policy, we want to inform you in clear terms as to what personal data we collect from you, for what purposes we will process this data, the legal basis for said processing, to whom your personal data may be transferred, how long we will retain your data, how we will protect your data and what rights you have with regard to the processing of your personal data.

1. WHO ARE WE?

The International Academy of Osteopathy is a non-profit organization incorporated under Belgian law, having its registered office at Bollebergen 2B bus 15, 9052 Gent (Belgium), registered with the Crossroads Bank of Enterprises under the number 0459.285.397 (hereinafter “**IAO**”, “**we**” or “**us**”).

IAO is a non-profit organization offering training within the field of osteopathy in the form of education, in-service training and retraining. In the context of these activities, we collect, hold, disclose and/or otherwise process personal data. Pursuant to the applicable data protection legislation, we qualify as the “data controller” with respect to these personal data.

2. WHOSE PERSONAL DATA DO WE COLLECT?

In the context of our activities, we may collect personal data from students, prospective students (info applicants and participants in open days), teachers, assistants, employees, visitors to our website, persons who provide us with their contact information, and persons who come into contact with us in other ways.

3. WHAT PERSONAL DATA DO WE PROCESS?

We may collect the following personal data about you insofar as this information is relevant for the purposes for which it is required, as explained under title 4 below. Any time certain information is required and other information is optional, this shall be clearly indicated as such, so that you can choose whether or not to provide us with such information.

| | |
|-----------------------------------------------|--------------------------------------------------------------------------------------|
| Identification and contact information | Personal identification data: name, address, telephone or GSM-number, e-mail address |
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| | |
|----------------------------------|--------------------------------------------------------------------------------------------------------|
| | Electronic identification data: IP-address, information collected via cookies (read our Cookie Policy) |
| Financial information | Identification and bank account numbers |
| | Financial transactions: amounts that you have paid, overview of the payments, etc. |
| Personal characteristics | Personal details: date of birth, sex, nationality |
| Profession and employment | Professional activities, diplomas |
| Other | Other data you provide to us |

4. FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA AND ON WHICH LEGAL BASIS DO WE BASE SUCH PROCESSING?

We can use your personal data for the following purposes:

- For the management of education and training that we provide pursuant to an agreement entered into with you;
- For access to the private learning platform HUB;
- For the management and optimization of our website;
- For improving our general and personalized services;
- For marketing purposes, namely our electronic newsletter (if you have subscribed to it).

For your perfect information, below you can find the legal grounds on which these processing activities take place:

- For the processing of your personal data for the *management of the education and training courses we provide* and for the *online learning platform*, we rely upon the **necessity for the performance of an agreement we concluded with the data subject**. If you do not provide us with the necessary personal data for the performance of an agreement that has been/will be concluded with you, we cannot guarantee the proper performance of the agreement;
- For the processing of your personal data for *electronic direct marketing purposes* (e.g. sending an electronic newsletter), IAO relies on your **opt-in consent**. Only if you have unambiguously indicated that you would like to receive IAO's newsletter, IAO will register you for this purpose. You are completely free to do so or not.

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You have the right to withdraw your consent at any time, without IAO charging you any cost and without any negative consequences for you. You can do this via the opt-out link included in every marketing e-mail from IAO or by sending an e-mail to info@osteopathy.eu.

- in *all other cases*, the processing of your personal data is based on our **legitimate interests** (i.e. our interest in contacting prospects and prospective students, handling inquiries, promoting our educational activities in general, both online and offline and maintaining our contacts).

5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may disclose your personal information to the following parties:

- **With our service providers who act as our ‘processors’** such as, without limitation, IT/cloud service providers (payment tools, accounting software and the developer of the HUB learning platform) and PR/marketing agencies.
- **With our professional advisors** such as external law firms and accountants.
- **Other educational institutions** if strictly necessary to fulfil the stated purposes (training for master of science in osteopathy), especially Buckinghamshire New University (BUCKS University).
- **With government authorities** such as the government, police authorities or the judiciary in case we are legally required to do so.

Please note that this list is not exhaustive. There may be other cases wherein we may need to inform other parties in order to provide our services most effectively.

When transferring personal data to third parties, we always ensure that we take appropriate protection measures. We cooperate with service providers who process certain data on our behalf. This is done solely in accordance with applicable data protection legislation. In particular, we have concluded transfer agreements or a data processing agreement with our service providers - insofar as required by law - that comply with the requirements of Article 28 of the GDPR and provide instructions to the service providers on how they are to handle the personal data. Through careful selection and regular monitoring, we ensure that our service providers take all organizational and technical measures necessary to protect your personal data.

Your personal data will not be shared or sold to third parties for marketing purposes without your prior explicit consent.

If your personal data is transferred to recipients in countries outside the European Economic Area, we always ensure that we take appropriate protection measures. Such transfers are made on the basis of corresponding adequacy decisions of the European Commission or appropriate safeguards within the meaning of Article 46 of the GDPR are provided for the protection of

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your personal data in accordance with legal requirements (EU standard contractual clauses or binding corporate rules). Upon request, we will be pleased to provide you with further information on the appropriate safeguards.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data will not be stored for longer than is necessary in relation to the purposes for which we collect and process them (as listed above).

- Personal data included in **accounting, financial or other official documents** will be retained for as long as such documents need to be kept pursuant to a legal requirement. For accounting documents this is ten years and for invoices it is seven years;
- Personal data required for the **execution and follow-up of a contractual relationship** will be kept for the entire duration of that relationship and for 10 years following termination thereof;
- Regarding the personal data of **visitors to our website**, please refer to our Cookie Policy.

Only where we are legally obliged to do so, or when this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), will we retain personal data for longer periods.

More information on our retention periods is available upon simple request.

7. DIRECT MARKETING

As a prospective student, you can subscribe to our newsletter to be informed of recent developments within osteopathy education and training. Students can subscribe to newsletters and push notifications in apps to be kept informed of developments within the profession and discipline of osteopathy and osteopathy education.

The newsletters and push notifications we send always have opt-out options so that you can unsubscribe from them.

8. HOW DO WE PROTECT YOUR PERSONAL DATA?

We take appropriate technical and organizational measures to ensure a level of security appropriate to the specific risks we have identified.

We therefore protect your personal data as best we can against the destruction, loss, alteration, or unauthorized disclosure of or access to personal data transmitted, stored, or otherwise processed.

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For example, the HUB learning platform is located on a secure server managed by IAO and possesses an SSL certificate through which we secure the connection between our website and visitors via HTTPS encryption.

Our employees, faculty and other staff are contractually obligated to respect the confidentiality of your personal data while performing their duties.

More information about our security measures is available upon simple request.

9. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

Within the limits defined by articles 15-22 of the GDPR, you have the following legal rights with respect to your personal data:

- **Right of access:** You have the right to obtain confirmation from us as to whether or not we are processing your personal data, to obtain access to that personal data and how and why they are processed, as well as to receive a copy of that data.
- **Right to rectification:** You have the right to obtain a rectification of your personal data or to request that we complete your personal data if you notice that we are processing incorrect or incomplete data about you.
- **Right to erasure (“right to be forgotten”):** You have the right to obtain data erasure in certain specific cases.
- **Right to restriction of processing:** You have the right to have the processing of your personal data restricted in certain specific cases.
- **Right to data portability:** You have the right to obtain the personal data you have provided to us in a structured, common and machine-readable format, and to transfer (or have transferred) that personal data to another controller if the processing is based on your consent or on an agreement and if the processing is carried out by automated means.
- **Right to object:** You have the right to object to the processing of your personal data on the basis of our legitimate interest for reasons relating to your specific situation.
- **Right to object to direct marketing:** You have the right to object to the processing of your personal data for direct marketing purposes. This right is absolute - we will always comply with it.

You can exercise the aforementioned rights by **sending an e-mail to info@osteopathy.eu**.

The exercise of these rights is in principle free of charge. Only where requests are manifestly unfounded or excessive, can we charge a reasonable fee.

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We aim to respond your requests or questions as quickly as possible. When in doubt, we may first ask you for additional information or request proof of identity to verify your identity.

For further information and guidance on the abovementioned rights, please refer to the Belgian Data Protection Authority website: www.gegevensbeschermingsautoriteit.be.

In addition to the aforementioned rights, you always have the right to lodge a complaint with a European supervisory authority regarding the processing of your personal data by us. In Belgium, the competent supervisory authority is the Data Protection Authority. You can reach the authority at contact@apd-gba.be or by regular mail at the following address:

Gegevensbeschermingsautoriteit
Drukpersstraat 35
1000 Brussel (Belgium)

10. CHANGES TO THIS PRIVACY POLICY

From time to time it may be necessary to change this Privacy Policy. When we post changes to this policy, we will change the date of the "latest update" at the bottom of this document. The most current version of this Privacy Policy will be available on our website at all times.

11. CONTACT

If you have any questions or concerns about this Privacy Policy or the processing of your personal data by us, you may contact us by e-mail at info@osteopathy.eu.

Privacy Statement

PRIVACY STATEMENT

This privacy policy applies to the services of The International Academy of Osteopathy® - vzw (IAO). We are not responsible for the privacy policies of other sites and resources. By using this website, you indicate your acceptance of the privacy policy.

We respect the privacy of all users of our site and treat the personal information you may entrust us with via this site with care.

The International Academy of Osteopathy - vzw (IAO) processes personal data in accordance with this privacy statement. For further information, questions or remarks about our privacy policy, please contact us at this email address:

info@osteopathy.eu

Processing purposes

The International Academy of Osteopathy, hereafter called "IAO", collects and processes the personal data of students and candidate students for the management of the osteopathy education it provides. Prospective students (information seekers and participants of open days) are kept informed of recent developments within the osteopathy education and training (if they wish so), this via newsletters that have opt-out options. Students get access to the eCampus (private learning platform) through login and password. Students are also kept informed of developments within the

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profession and discipline of osteopathy and osteopathic education through newsletters and push notifications in apps or via text messages. Every single platform has opt-out options.

The eCampus is on a secure server managed by the IAO. Personal data is only shared with the company SEBSOFT, for development purposes only and with the teachers (for teaching related purposes). The IAO has entered into a processing agreement with both aforementioned parties.

The eCampus possesses the SSL certificate. With an SSL certificate we secure the connection between our website and visitor through HTTPS encryption.

The personal information requested (name, address, phone number, date of birth, gender, occupation, diplomas, email address,...) is for the purpose of ensuring the training process.

When you send emails or other messages to the IAO, we may retain those messages. Sometimes we ask for your personal information relevant to the situation at hand. This enables us to process your inquiries and respond to your requests. The data is stored on our own secure servers or those of a third party and is deleted at the latest when the Student finishes his studies at the IAO.

Legal basis of processing

Personal data is processed based on article 6.1. (Consent is given by requesting information or by registering for a course or training) of the General Data Protection Regulation. The consent via request for information or registration on a training or course can always be withdrawn via simple notification by email or "opt-out" regarding newsletters.

Transfer to third parties

When strictly necessary for the realization of the intended purposes (training to Master of Science in osteopathy), the personal data of the Student will be shared with other institutes, in particular Buckinghamshire New University - BNU (London).

For students, the data will also be shared with "PAY.nl" and the accounting program "Venice" which provides the payment processing of the training and courses.

The IAO guarantees that these recipients have committed themselves in writing to take the necessary technical and organizational measures to protect personal data in accordance with the provisions of the General Data Protection Regulation.

The information is otherwise not shared with other third parties. In some cases, the information may be shared internally. Our employees, teachers and other staff are obliged to respect the confidentiality of your data.

Retention period

Personal data processed for customer management purposes will be retained for the period necessary to comply with legal requirements (including accounting).

Right of access, rectification, erasure, restriction, objection and transferability of personal data

The Student or applicant has the right to access his personal data at any time and may correct them (or have them corrected) if they are incorrect or incomplete, have them deleted, restrict their processing and object to the processing of personal data concerning him on the basis of Article 6.1 (f) of the AVG, including profiling on the basis of those provisions.

In addition, the customer has the right to obtain a copy (in a structured, common and machine-readable form) of his personal data and to have the personal data

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forwarded. The personal data concerned are stored on the eCampus and are protected via personal login and password. They are always visible to the Student or candidate Student.

In order to exercise the aforementioned rights, the Student is asked to send an e-mail to the following e-mail address: info@osteopathy.eu

Direct marketing

The Student, candidate student or information seeker has the right to oppose, free of charge, any processing of his personal data for the purpose of direct marketing.

Clinic

The IAO manages patient data in the "clinic" in an electronic manner. Students and lecturers (internship supervisors) use these personal data of patients to make the osteopathic treatments efficient and safe. These data are only made available to third parties (other recognized health care providers) when the patient explicitly requests it (e.g. in communication with a general practitioner).

The patient's data are visible to the company CROSSUITE with whom the IAO has concluded a processing agreement.

The IAO guarantees that these recipients have committed themselves in writing to take the necessary technical and organizational measures to protect the personal data.

Possible modifications

This privacy statement is tailored to the use of and the possibilities on this site. Any adjustments and/or changes to this site may lead to changes in this privacy statement. It is therefore advisable to consult this privacy statement regularly.

Complaint

The Student, prospective Student or information applicant has the right to lodge a complaint with the Data Protection Authority or GBA (Rue du Printing 35, 1000 Brussels - contact@apd-gba.be).

Questions and feedback

We regularly check whether we comply with this privacy policy. If you have any questions about this, please feel free to contact us:

The International Academy of Osteopathy – IAO

Bollebergen 2B - Bus 15, 9052 Ghent, Belgium

info@osteopathy.eu

Closed at Ghent

On the date that the Student signs via the eCampus for maintenance of the Study Contract, of which the Student declares to have printed one (1) copy on the eCampus, and a second copy electronically destined for the IAO.

When checked, the Student signs for "read and approved".

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