Privacy Policy

1, Introduction

This Privacy Policy outlines the manner in which Mind Retreat Company B.V. ("we", "us", or "our") collects, uses, maintains, and discloses information collected from users (each, a "User") of its services and website. As a Data Controller, we are committed to safeguarding the privacy of our Users in accordance with the General Data Protection Regulation (GDPR) and other applicable data protection laws in the Netherlands. Personal data shall be processed in a manner that is lawful, fair, and transparent, ensuring the confidentiality and integrity of such data.

This Policy applies to the collection and use of personal information by Mind Retreat Company B.V. through any means, including but not limited to our website, mobile applications, and any service we offer. By accessing and using our services, Users consent to the collection, storage, use, and disclosure of their personal information as described in this Privacy Policy.

2. Personal data; purpose and legal basis

We collect various types of personal data from Users. This data collection is essential for providing and improving the services offered by Mind Retreat Company B.V. The types of personal data collected include, but are not limited to:

- Contact information (e.g., name, address, email, telephone number)
- Demographic information (e.g., age, gender)
- Usage data (e.g., website visit duration, pages viewed), IP address

This information is collected for the purpose of providing services, marketing, customer support, and enhancing the User experience. The Data Controller will not use personal data for any purposes other than those specified in this Privacy Policy without obtaining explicit consent from the User. Health information, where voluntarily provided by the User for the purpose of using certain services may be processed by us as well, but solely for the purpose of providing the service concerned to the User.

The basis for our processing of personal data shall be consent, contractual necessity and/or legal obligation, vital interest or other legitimate interest, as applicable.

3. Data sharing and disclosure

We may share or disclose the personal data of Users in the following circumstances:

- To service providers, affiliates, and partners that assist in the operation of our website and the services provided by us, under strict confidentiality agreements.
- In response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- If required for the investigation, prevention, or action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
- In connection with a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding involving us that includes or requires the transfer of the information.
- With the explicit consent of the User.

The Data Controller will take all reasonable steps to ensure that any personal data shared is protected and handled in accordance with the standards set forth in this privacy policy and applicable laws.

4. Data subject rights

Users have the right to access their personal data, request correction or deletion of their personal data, object to or limit the processing of their personal data, to withdraw consent, and the right to data portability. Requests to exercise these rights can be directed to dataprivacy@mindretreatcompany.com. User shall also have the right to lodge a complaint with a competent supervisory authority.

5. Data security measures

We will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to the risk, in accordance with applicable data protection laws of the Netherlands. These measures are designed to prevent unauthorized or unlawful processing, accidental loss, destruction, or damage to User data.

We will regularly review and update our security policies and controls as necessary to ensure the ongoing security of User data. Furthermore, we ensure that all persons engaged by us in processing User data are aware of and comply with these security measures.

In the event of a data breach, the Data Controller will act in accordance with applicable legal requirements, which may include notifying the relevant authorities and affected Users without undue delay.

6. Data retention policy

We will not retain personal data of Users for longer than is necessary for the purposes for which the data were collected or for which they are further processed. The specific retention periods for different categories of personal data are determined based on (i) the nature and purpose of the personal data collected; (ii) the legal or regulatory obligations that require the data to be retained for a certain period; (iii) the necessity to retain the data for the establishment, exercise, or defense of legal claims; (iv) the consent provided by the User, where applicable, for a longer retention period.

Upon the expiry of the retention periods, personal data shall be securely deleted or anonymized, unless further retention is required for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

7. International data transfers

If there is a necessity for international transfers of personal data, these will be conducted in only if one of the following conditions applies:

- The European Commission has decided that the third country ensures an adequate level of protection.
- Appropriate safeguards have been provided for in a legally binding and enforceable instrument between public authorities or bodies.
- Binding corporate rules are in place.
- Standard data protection clauses adopted by the European Commission or a data protection authority are used.
- There are approved codes of conduct, together with binding and enforceable commitments of the controller or processor in the third country to apply the appropriate safeguards, including for the rights of data subjects.
- Approved certification mechanisms, together with binding and enforceable commitments of the controller or processor in the third country to apply the appropriate safeguards, including for the rights of data subjects.

In the absence of an adequacy decision or of appropriate safeguards, a transfer or a set of transfers of personal data to a third country or an international organization may only take place on the basis of derogations for specific situations as defined in the GDPR. In such cases, we will ensure that the transfer is necessary for the performance of a contract between the User and the Data Controller or for the implementation of pre-contractual measures taken at the User's request, among other possible conditions.

8. Automated decision-making and profiling

We do not engage in automated decision-making or profiling activities that have legal or similarly significant effects on Users. Automated decision-making refers to a decision made solely on the basis of automated processing, including profiling, which produces legal effects concerning the User or similarly significantly affects them.

Should we decide to introduce such practices in the future, it will ensure compliance with applicable privacy laws, including providing clear information to Users about the logic involved, as well as the significance and the envisaged consequences of such processing for the Users. Furthermore, we will obtain the explicit consent of Users before engaging in any automated decision-making or profiling activities that affect them in a significant way.

9. Cookies and similar technologies

We uses cookies and similar technologies (hereinafter referred to as "Cookies") on our website to enhance User experience, analyze website traffic, and serve targeted advertisements. By using the website, Users consent to the use of Cookies in line with this Privacy Policy.

Cookies are small text files that are placed on your device by websites that you visit. They are widely used to make websites work more efficiently, as well as to provide information to the owners of the site. The types of Cookies we use may include, but are not limited to, essential cookies (necessary for the functioning of the website), performance cookies (to analyze how Users interact with the website), and advertising cookies (to display relevant advertisements to Users).

Users have the right to choose whether or not to accept Cookies. However, please note that if Cookies are not accepted, some parts of the website may not function as intended. Users can manage their Cookie preferences through their browser settings at any time.

10. Amendments to the policy

This Privacy Policy may be updated or amended from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in the applicable law. When we do, we will revise the updated date at the bottom of this page. We encourage Users to regularly review this policy to stay informed about how we are protecting the personal data we collect. Your continued use of the services or access to the website after any amendments to this policy will constitute your acceptance of such changes. If we make any material changes to this policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

11. Contact details

If you have any questions or concerns regarding your privacy while using our services, or if you wish to exercise any of your rights under the applicable data protection laws, you may contact us at dataprivacy@mindretreatcompany.com, or:

Mind Retreat Company B.V., Maalderij 5, 2352 NT Leiderdorp, or +31636299183.

Please include your name, contact information, and a detailed description of your request or privacy concern when reaching out to us. We will respond to your inquiries within a reasonable timeframe.