

Boom Uitgevers Privacy Policy

General

This is the Privacy Policy of Koninklijke Boom Uitgevers BV and its subsidiaries, hereinafter referred to as 'Boom Uitgevers'.

Boom Uitgevers greatly values your privacy and is convinced that protection of the private sphere of its customers and website visitors is essential. Boom Uitgevers will handle your data carefully and will ensure that any processing of your data meets the applicable laws and regulations. We would like to inform our customers and website users about the way in which we handle the collecting and processing of their personal data.

This privacy policy may be changed from time to time if new developments give cause to such. The latest privacy policy can be found on www.boom.nl. Boom Uitgevers will inform you about major changes before they take effect.

Boom Uitgevers also recommends that you regularly consult this privacy policy so that you may be aware of any changes. The privacy policy always states the date of the latest change.

This privacy policy was last changed on 30 August 2018.

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1. When does this privacy policy apply?

This privacy policy applies to all data Boom Uitgevers collects and processes of its customers and users of its products, websites, web shops, mobile applications and other services. The following companies belong to Boom Uitgevers:

Koninklijke Boom uitgevers B.V.

Stationsweg 66
7941 HG Meppel
+31 0(522) 266111
www.boom.nl

Boom uitgevers Amsterdam B.V.

Prinsengracht 747-751
1017 JX Amsterdam
+31 0(20) 52 00 120
www.bua.nl

Boom uitgevers Den Haag B.V.

Kanonstraat 4-IV
2514 AR The Hague
+31 (0)70 330 70 33
www.boomdenhaag.nl

Edu'actief B.V.

Stationsweg 66
7941 HG Meppel
+31 0(522) 235235
www.eduactief.nl

Uitgeverij Sarphati B.V.

Horaplantsoen 20
6717 LT Ede
+31 (0)318) 648 500
www.uitgeverij-sarphati.nl

Boom voortgezet onderwijs B.V.

Ubbo Emmiussingel 19
9711 BB Groningen
boomvoortgezetonderwijs.nl

De Tijdstroom

Janskerkhof 26 (in de Janskerk)
3512 BN Utrecht
+31 (0)30 2364450
Internet: www.tijdstroom.nl

Boom Medische Uitgevers BV

Vondellaan 150
3121 GH Utrecht

Boom uitgevers distributiecentrum B.V.

Stationsweg 66
7941 HG Meppel
+31 (0)522 237 555

If you arrive at a third-party website or application via a digital service of Boom Uitgevers, the privacy policy of the third party concerned applies to the processing of your data. Boom Uitgevers is not responsible for the processing of your personal data via these websites or applications. You are advised to consult the privacy policy of this third party.

2. Who is responsible for your data?

The relevant Boom Uitgevers subsidiary you are doing business with and/or you provide your data to acts as the controller of your data. Most of your data is also processed centrally at the Koninklijke Boom uitgevers BV holding company, which provides its subsidiaries with general and technical support including with regard to ICT/security and administration/finances. In this event, Koninklijke Boom uitgevers BV acts as joint controller for the subsidiary concerned. Furthermore, some data will be forwarded to Boom distribution centre, which is responsible for distributing publications within the group and acts as the processor of your data in this role.

Boom Uitgevers as processor

In addition, Boom Uitgevers can act as processor for third parties. This is the case if you purchase the product/service from Boom Uitgevers through a third party, for example for primary, secondary and vocational education and for test products of Boom test training. In these cases, the third party through which you use or purchase the product/service, for example the school or the test agency concerned, is the controller for the processing of data.

3. Which data do we process and to what end do we use them? When offering our products and services, Boom Uitgevers processes (personal) data of its customers, relations, suppliers and of visitors/users of its websites and applications. Which personal data is processed may vary for each product and service. In general, the following (categories of) data are collected and processed for the following purposes:

A. Ordering products and/or providing services

You can order books, journals and other paper and digital publications, courses or other products and/or services via our website and also via telephone or in writing. Teachers may for example register for the electronic teacher service, where they can, for example, examine or download evaluation copies.

This involves the processing of personal data, such as name and address, gender, telephone number, e-mail address, the position of the customer, the name of the company and/or organisation of the customer, details concerning the size of the company and the industry in which the company or organisation operates, VAT number and the Chamber of Commerce number, financial details such as bank account number, ordered products/services, interests reported.

Purposes for the processing of the above-mentioned data:

a) for realising and performing the agreement

to supply the products, services or information you selected, for accounting purposes, invoicing, audit, verification of credit and other payment cards. In addition, we will use your details to communicate with you and maintain our relationship; we may on occasion contact you by e-mail or post for administrative or operational purposes, for example in case of a service message. Please be aware that these messages are not for marketing purposes and you will receive them even if you have turned off the option for receiving commercial messages for similar products or services by Boom Uitgevers.

The legal ground for this processing is performance of the agreement.

b) to meet administrative, fiscal and legal obligations and to protect our business interests

for collection, fraud screening, safety, security and legal purposes, such as dealing with disputes and meeting applicable laws and regulations.

The legal ground for the above-mentioned purpose is to meet a legal obligation.

Where this is not the case, as in collection, fraud screening, safety and security, the legal ground is the legitimate company interest of Boom Uitgevers to prevent fraud and other misuse of its services, to secure its website and products and defend, preserve or strengthen its legal position.

c) to keep you informed of our latest news and the products and services of Boom Uitgevers

we will inform you electronically and usually in the form of a newsletter about interesting news, recently published editions and similar products and services of Boom Uitgevers, if you so desire.

The legal ground for this is the legitimate interest of Boom Uitgevers to develop marketing activities. Upon your purchase, you can choose to opt out, and you will always have the opportunity afterwards to object against receiving electronic messages from Boom Uitgevers for marketing purposes in relation to its own similar products or services.

d) to personalise and improve your customer experience

to make you personalised offers and/or adjust the information offered to you or carry out market research based on your previous purchases and/or use of our services. This partly depends on your cookie settings. We refer you to our [cookie policy](#) for more information on this.

The legal ground for this processing is your consent.

e) to analyse, maintain, improve and secure our products, websites and accompanying services

Based on information about your interests and use of our products and services and any evaluations completed by you, we try to improve our products and services.

The legal ground for this processing is the legitimate interest of Boom Uitgevers to understand how customers use its services in order to improve and optimise them.

B. Creating a user account on a website or in an app, registering for a digital newsletter, requesting information

In these cases, personal data are processed, such as e-mail address, user name,

password, occupation and/or position of the person concerned, the school where the person concerned works, interests reported.

Purposes for the processing of the above-mentioned data:

a) for realising and performing the agreement

to create and facilitate your account and/or to send the information you requested. The legal ground for the above-mentioned purpose for the processing is performance of the agreement.

b) to meet administrative and legal obligations and to protect our business interests

for legal purposes, such as dealing with disputes and meeting applicable laws and regulations.

The legal ground for the above-mentioned purpose is to meet a legal obligation.

Where this is not the case, such as legal purposes, the legal ground is the legitimate interest of Boom Uitgevers to defend, preserve or strengthen its legal position.

c) to keep you informed of our latest news and the products and services of Boom Uitgevers

we will inform you electronically and usually in the form of a newsletter about interesting news, recently published editions and similar products and services of Boom Uitgevers only if you have given us explicit permission to do so.

The legal ground for this is consent. You have given Boom Uitgevers express permission for this, for example by opting in. You can withdraw your permission at any time.

d) to personalise and improve your customer experience

To make you personalised offers and/or adjust the information offered to you based on your use of our services. This depends on your cookie settings. We refer you to our [cookie policy](#) for more information on this.

The legal ground for this processing is your consent.

e) to analyse and improve our products, websites and accompanying services, as well as to maintain and secure them.

We try to improve our products and services based on information about your interests and any use of our products and services and any evaluations completed by you. This information also helps us to better maintain and secure our products and services.

The legal ground for this processing is the legitimate interest of Boom Uitgevers to understand how customers use its services in order to improve and optimise them and to secure and maintain its website and products.

C. You supply us with products or product parts and/or services

We collect personal data of our suppliers – which includes our authors, editors, translators, illustrators and other freelancers – such as name and address, gender, telephone number, e-mail address, the position of the supplier, the name of the company and/or organisation of the supplier, details concerning the size of the company and the industry in which the company or organisation operates, VAT

number and the Chamber of Commerce number, contract details and financial details such as bank account number.

Purposes for the processing of the above-mentioned data:

a) for realising and performing the agreement

to receive products, services or information we ordered for accounting purposes, calculation and payment of royalties, verification and payment of invoices, audit, credit and other payment card verification and, in the event of copyright statement, to state the correct source. And to communicate with you and to maintain our relationship.

The legal ground for the above-mentioned purpose for processing is performance of the agreement.

b) to meet administrative and legal obligations

for legal purposes, such as dealing with disputes and meeting applicable laws and regulations.

The legal ground for the above-mentioned purpose is to meet a legal obligation.

Where this is not the case, such as legal purposes, the legal ground is the legitimate interest of Boom Uitgevers to defend, preserve or strengthen its legal position.

Legal ground legitimate interest?

If we have stated that the legal ground for processing is a legitimate interest, we have weighed these interests against your legitimate interests. Where necessary, we have taken appropriate measures to limit the consequences for you and to protect you from unjustified damage. Our legitimate interests are for example security purposes, our business interest to collect debts and screen for poor credit risks, and our interests to provide you with better services and to make you personalised offers. When we process your personal data for our legitimate interests, you have the right to object to this at any time on the grounds of reasons related to your specific circumstances (see Chapter 7).

Store

We store your personal data for as long as is required for the purposes as described in this privacy policy or insofar as is required to meet applicable laws and regulations and to resolve disputes.

4. How do we obtain your data?

We collect the above-mentioned categories of personal data in the following ways:

a. Data you have provided us

When you purchase a product or service from us, create an online account, register for receiving a newsletter, the teacher service or one of our events or if you participate in a promotional campaign.

b. Data we collect automatically

Data concerning the equipment used such as a unique device ID, version of the operating system and settings of the equipment you are using to gain access to a service;

Data concerning the use of a service, such as the point in time you make use of it and the type of service that is used;

Location data originating from your equipment or derived from your IP address

which is passed on to us when you use a specific service;
More information about this can be found in the cookie policy on our website or the mobile apps you use.

c. **Personal data we receive from commercial partners**

Boom Uitgevers may receive information about you from commercially available sources, which can give us certain data about you with your permission. For example, we receive information from BME Onderzoek BV (Lisweb) concerning teachers and the subject they teach and the school where they work. BME Onderzoek provides only those data in respect of which they have valid grounds for providing them.

d. **Personal data we receive from the provider of your social network, which is dependent on your settings for social networks.**

If, for instance, you log in to our services using a social media account, we can – depending on your settings – receive your social media profile, including contact details, interests and contacts. On your social media provider’s website, you can find more information about this, such as the privacy policy of the provider and about changing your settings.

5. **Providing data to third parties**

a. **Internally: within the group of Boom Uitgevers**

As stated in Chapter 2, your data will also be shared internally with Koninklijke Boom Uitgevers BV, in which case Koninklijke Boom Uitgevers BV acts as joint controller together with the relevant Boom Uitgevers’ subsidiary. Insofar as Koninklijke Boom Uitgevers BV acts as joint controller, you can exercise your rights in full in the manner stated under 8. Furthermore, some data will be forwarded to Boom distribution centre, which is responsible for distributing publications within the group and acts as the processor of your data in this role.

b. **External Processors**

Your data can, without your consent, be provided to parties Boom Uitgevers involves for the performance of its service provision (for example the supplier of a product you ordered). In this event, your data will be used only for the purpose for which you have provided them (for example for delivering the product). Third parties Boom Uitgevers involves for this do this in the capacity of processor for Boom Uitgevers. With regard to Google Analytics we would like to say that we concluded a processing agreement with Google, we mask the last octet of your IP address, we don’t share the data with Google and that we don’t make use of any other Google services in combination with the Google Analytics cookies.

c. **Other parties**

Boom Uitgevers may also involve third parties, such as DoubleClick, for analysing the data on your use of the website and for personalising its websites and communications, and for showing relevant offers and ads. This will happen only if you have given informed consent for this. Only if Boom Uitgevers is legally obliged to do so will your personal data be provided to regulators, fiscal authorities and investigation authorities.

6. Passing on personal data to third countries

In principal, your personal data will not be passed on to recipients in countries outside the European Economic Area. However, this may happen in the context of our service provision or the delivery of products. For example, we make use of MailChimp and Google Analytics, which both have their main office in the United States. Boom Uitgevers will always make sure that data is passed on only when this is allowed based on applicable (European) privacy regulations, for example because the country in question offers an appropriate level of protection or if an unmodified model contract is used which is intended for this purpose and approved by the European Committee (hereinafter: 'EC Model Contract').

7. Security

Boom has taken proper technical and organisational safety measures to secure your data against loss or unlawful use.

For all its systems and ICT services, Boom makes use of specialised parties such as data centres and ICT suppliers. These parties supply suitable physical, technical and organisational safety measures for all your data. The suppliers involved have relevant ISO and NEN certification and take all additional measures which can and may be expected of these specialised partners in view of the current state of the art.

In addition to the security measures taken on our side, such as encryption of your data, we advise you to take the appropriate care in selecting a password and to make sure your login details remain secret.

8. Your rights

You can invoke all the rights you have at any time in accordance with the applicable privacy legislation, such as (a) request inspection of the data Boom Uitgevers has collected about you, (b) have these data rectified (c) have your personal data removed, (d) limit the processing of your data, (e) the right to data portability and (f) your right to object against processing of your data.

a. Right to inspect

You are allowed to ask us if we process your personal data and, if this is the case, to request an overview of the processed (categories) of data. When we provide access to inspect these details, we will also give you extra information such as to what end the data are processed.

b. Right to rectification

You have the right to (have) your data changed if they are not correct and/or complete. On request, we correct inaccurate personal data and complete incomplete personal data, while taking account of the purpose for which they are processed. If applicable, you can also change the entered personal data yourself via your user account.

c. Right to removal

You also have the right to have your personal data removed from our systems under certain circumstances (as described in Article 17 of the General Data Protection Regulation – GDPR).

d. Right to limitation of processing

You have to right to suspend the processing of your personal data. Article 18 of the General Data Protection Regulation (GDPR) states in which cases this is possible.

e. Right to data portability

Your right to data portability means that you may ask us to pass on your personal data to you or another data controller in a structured, standard and machine-readable format if technically possible.

f. Right to object

You also have the right to object to the processing of your personal data. This means that you may ask us to stop processing your personal data. This applies if the legal grounds for processing are formed by 'legitimate interests'.

You can object against the processing of your personal information for direct marketing purposes at any time and free of charge. You can unsubscribe for newsletters from Boom Uitgevers via the link in the newsletter in question. In addition, you can always withdraw your consent for the use of your personal data for direct marketing purposes via privacy@boom.nl. We aim to process the withdrawal of your consent for using your postal address, e-mail address or telephone number within two weeks. You may therefore still receive a number of messages after withdrawing your consent.

In addition, you may withdraw any consent you have given for processing at any time by clicking the unsubscribe link in your e-mail or by adjusting your communication preferences in your account.

If you want to make use of one of the options mentioned above, you can do this by e-mail to:
privacy@boom.nl

or in writing to:

Boom Uitgevers
attn. Klantregistratie (Customer Registration)
Stationsweg 66
7941 HG Meppel

To make sure we are dealing with the correct person, we may ask you to confirm your request via the account linked to your e-mail address and/or, in case of doubt, we will ask you to send a copy of your valid passport, driving licence or proof of identity with your request.

Situations may arise where we can refuse or restrict your rights as described above. In this event, we will carefully judge whether such an exceptional situation applies and inform you of this. We may for example refuse to remove (some of) your personal data if processing such data is still necessary to perform the agreements or to meet legal obligations.

If you have any questions or complaints or if you want to respond to this privacy policy, you can contact us by telephone or via privacy@boom.nl. You furthermore have the right to submit a complaint with the Nederlandse Autoriteit Persoonsgegevens (Dutch Data Protection Authority) on <https://autoriteitpersoonsgegevens.nl> in The Hague.

Your rights if Boom Uitgevers is a processor

You will have to apply to the relevant data controller. If Boom Uitgevers is involved in dealing with a request to inspect, correct and remove data on the instruction of a data controller, it will act in accordance with the policy of the data controller involved.

9. Contact

Should you have any questions regarding the manner in which Boom Uitgevers handles your data, you can contact Boom Uitgevers via privacy@boom.nl.