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Privacy statement - version date 22 May 2018

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If we speak of personal data, we do not mean only factual personal data, but also all other sorts of data that could, in one way or another, be traced to an individual person.

Identity of the processor

The processing of personal data is restricted to staff of the head office on Curacao, namely 'Fundashon Na Kaminda' or staff of the subsidiary and/or department thereof, such as 'Stichting Na Kaminda Netherlands', both known under the name 'Na Kaminda'. Personal data of any kind whatsoever will never be shared with other parties than our organization - with the exception of:

- Google Analytics, with which, by placing 'cookies', data that has been anonymized and untraceable is used to generate users' statistics for marketing goals.
- data centers where we rent server space for storing your and our data. We guarantee that the stored data is illegible for these parties thanks to the specific encryption. We also assure you that data and documents, under no circumstance, can be looked into by anyone except for our authorized staff.

Legal grounds for processing personal data

'Na Kaminda' offers services that require the provision of personal data enabling us to execute the agreement. Also, in most cases, personal data is a legal prerequisite to executing the agreement in cooperation with governments, semi-governments, ministries (such as immigration and admission services), notary office, mover or freight forwarder, etc. Refraining from providing personal data will imply that we cannot execute the agreement and, therefore, are unable to offer our services.

How we collect personal data

- A. The factual personal data will be provided by the person concerned; on paper via regular mail, via e-mail, by phone, via announcements in the messages center of the client file or other ways. In the case we (need to obtain personal data from others than the person concerned, this person will grant permission or has given prior consent in writing to 'Na Kaminda'. In the case that unexpectedly personal data must be provided to another party, before providing these, we will first request explicit permission from the person concerned. We only provide the absolutely necessary information to third parties and, with no restriction, do so with your prior consent only
- B. Indirectly, data that is anonymized and untraceable to a person is collected by placing 'cookies' via our website

The (personal) data we process

The personal data we process for a file depends on the required personal data concerning the (to be) provided services.

A. Factual and directly traceable personal data:

- name, address, and zip code - both current data and data after the immigration or departure
- phone number and e-mail address - both current data and data after the immigration or departure
- date of birth, place of birth, and country of origin
- ID-data, passport copy, and nationality
- in some cases, recordings of conducted phone conversations
- various documents related to the person concerned via (local) governments, requested and obtained by the person concerned and provided to us, such as extracts from public records, extracts of birth and marriage certificates, notarized documents, ministerial documents, etc.

B. Indirect and untraceable personal data:

- via Google Analytics and our systems log files, also IP-location data that is untraceable to a person are collected.



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How we process your personal data

The factual personal data will only be used to execute the requested services by the person concerned, and only then, when this is necessary for the legal, judicious or practical purpose.

Personal data can be provided to domestic and foreign authorities or (semi-)governments, however, never without the prior consent of the person concerned. We will never use your data for inappropriate purposes nor sell them to or provide them for assessment by other parties.

A. Factual and directly traceable personal data

Authorities or persons to receive personal data, depending on the particular service, could include:

- the IND (Immigration and Naturalization Service) and immigration authorities, both domestic and international and out of the European Union
- a notary office, both domestic and international and out of the European Union
- tax authorities, tax expert or accountancy firm, both domestic and international and out of the European Union
- mover, freight forwarder, shipping company or agents, both domestic and international and out of the EU
- lessor or rental agencies of homes or business units, both domestic and international and out of the EU
- in some specific cases, recordings of conducted phone conversations. These will only be used internally for quality assessments, training purpose, and for carefully registering (identifying) details regarding the requested service or in sporadic cases for legal evidence.

B. Indirect and untraceable personal data

- Google Analytics anonymized data that we retrieve via our website, will only be used by our organization for statistical and SEO-technical purposes. Among these are: where do our website visitors come from, how often do people visit our website and which pages, which of our services catches their interest, how do they browse our website, etc.
- the log-files within our CMS-system ('*Client Management System*') have the purpose of ensuring the security of client's data to detect and counter inappropriate use timely.

How we store (personal) data

Both your and our (personal) data and documents are stored digitally on our private system abroad (encrypted and based on a 'zero-knowledge' principle), primarily in the UK and Canada. Paper documents are digitalized upon receipt and added to the file concerned. Following, after digitalization, these paper documents are carefully and temporarily filed until the moment these papers are legally and for the execution no longer relevant.

Retention and criteria

The retention and criteria differ, depending on the nature and origin of the data.

For all files both in and out the European Union applies:

- digital copies of identity certificates, when they belong to and are filed in closed files, will be deleted permanently from our systems within 6 months at the latest.
- paper copies of official documents will be archived temporarily and, due to security reasons, filed as shortly as possible. Documents relevant to the person concerned will be returned by registered mail or personally. As soon as they are no longer relevant, other paper documents will be destroyed with the utmost care
- in the case of recorded phone conversations, they will be filed for a maximum of 2 months before they are automatically deleted unless there are justified or severe grounds to save these conversations for a longer period.

For all intakes and files where the person concerned lives in the European Union (as far as known since the last moment of contact) the following applies:

- full and automatic deletion of all (personal) data within or at the latest after 24 months of files with the status 'intake' or 'pending' where the last known action took place 24 months ago or longer (*files that are awaiting approval have not yet been confirmed, or we have not heard anything from the person concerned*), unless there are justified or severe grounds to save personal data for a longer period.



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- full and automatic deletion of all (personal) data within or at the latest after 60 months of closed files (*completed or for the moment completed accounts*) where the closing date has been passed 60 months or longer unless there are justified or severe grounds to save personal data for a longer period.

The general approach is: digitally stored (personal) data will be saved until a maximum of 5 years after closing the account. After that time, all data will be deleted automatically unless there are justified or severe grounds or legal data retention should decide otherwise.

Your rights, questions, and complaints

With regard to your personal data known to us, you have a number of rights. The most important rights include:

- **the right to access** your personal data.
Mostly, the person concerned can access his personal data via the online file directly. Should this, for whatever reason no longer be the case, the person concerned has the right to request this. If we do have your data, we will provide them digitally (not via regular mail) within the set deadline.
- **the right to rectification** and completion (correction or alteration of your (personal) data).
- **the right to data portability** (right to transfer personal data).
- **the right to be forgotten** - deleting or removing all of your personal data.

This is where you can find an overview of the GDPR privacy rights (click link)

Should you have **any questions or request regarding your rights**, please mail to privacy@nakaminda.net stating your name, address, and phone number. If possible, please include your file number. We will meet your request or contact you within four weeks.

For complaints, you can contact in The Netherlands: [‘Autoriteit Persoonsgegevens’](#) (click link)

Changing our privacy statement

‘Na Kaminda’ reserves the right to make changes in their privacy regulations. Because we take privacy extremely serious and because (digital) security within our organization is a constant area of concern, you can expect us to enhance and strengthen our privacy or security policy when making alterations - it will rarely consist a liberalization. The current and most accurate version is stated on the website marked with a version date. If and when you use our website after this date, we consider this a tacit agreement from your part of changed policy regulations, as stated in the new privacy statement.

This privacy statement is part of the ‘Na Kaminda’ general conditions.