

# Privacy Statement

Human Behaviour Group BV · Version 3.0 · July 2026

At HBG everything revolves around human behaviour. About one kind of behaviour we are very strict: how we handle your data. Here you can read exactly what we collect, why, how long we keep it and what your rights are. This is a translation of the Dutch "Privacyverklaring v3.0"; in the event of any discrepancy, the Dutch version prevails.

## 1. Who is responsible?

Human Behaviour Group BV, Flemingweg 8, 2408 AV Alphen aan den Rijn, the Netherlands, Chamber of Commerce 99232367, is the data controller. Your privacy contacts are Theo Brack and Peter Jantz. Questions or requests: avg@humanbehaviourgroup.com. We respond within one month.

## 2. What data do we process?

- 1. Account and contact:** name, email address, phone number, organisation, role.
- 2. Behavioural profiles and assessments:** your questionnaire answers and their outcomes, such as DISC profiles, drivers analyses and comparable reports. This is the core of our services and we treat it as sensitive information.
- 3. Trajectory content:** coaching session notes, evaluations, the content of our email exchanges.
- 4. Business and financial:** invoicing details, company details, payment status.
- 5. Portal usage:** login data, e-learning progress, technical logs for security.

## 3. For what purpose and on what basis?

- 1. Performance of the agreement:** creating accounts, scheduling training, delivering assessments, providing coaching, sending invoices.
- 2. Legal obligation:** retaining our administration for the tax authorities.
- 3. Legitimate interest:** improving our services, securing the portal, informing existing contacts about relevant services. You can always opt out.
- 4. Consent:** newsletters to non-clients, use of imagery, sharing your individual profile with your employer or client. Consent can always be withdrawn.

## 4. Your behavioural profile: three firm promises

- 1.** Your individual profile is yours. We only share it with your employer or client if you give prior consent.
- 2.** We never sell personal data and never use your profile for advertising.
- 3.** Profiles are used only for their purpose: your insight and development, and — aggregated and non-identifiable — for research and improvement of our methodology.

## 5. Who receives data?

We share only what is necessary, with parties we have agreements with (data processing agreements):

- 1. Enmax AB / Ensize** (Sweden, EU): the Navigator assessment platform.
- 2. Hosting providers of our portal and database** (EU region).

**3. Mollie (Netherlands):** payments.

**4. Our CRM and email platform** and mail delivery services.

The current list of sub-processors is available in the portal. Where a party processes data outside the EEA, this only happens with appropriate safeguards such as an adequacy decision or EU standard contractual clauses. Beyond that, we only share data where the law requires us to.

## 6. How long do we keep data?

**1. Administration and invoices:** 7 years (legal obligation).

**2. Behavioural profiles and reports:** as long as your account is active; after account deletion we erase them within 12 months, unless you want to keep them longer.

**3. Coaching notes:** 2 years after the trajectory ends, unless we agree otherwise.

**4. Account data:** up to 2 years after your last login.

**5. CRM contact details:** up to 3 years after the last meaningful contact.

## 7. How do we secure your data?

Your data lives in secured systems with encrypted connections. Signing in with passkeys (biometrics) and two-factor authentication is available and recommended for everyone. We limit access to people who genuinely need it, log who does what and continuously tighten our security policy. Should we nevertheless discover a data breach posing a risk to you, we report it to the Dutch Data Protection Authority and inform you immediately.

## 8. Your rights

You have the right to access, rectification, erasure, restriction of processing, objection to processing based on legitimate interest, data portability (receiving your data in a readable format) and withdrawal of consent. Email [avg@humanbehaviourgroup.com](mailto:avg@humanbehaviourgroup.com) and we arrange it within one month. We may ask you to verify your identity.

## 9. Cookies

Our websites and portal use functional cookies (necessary) and statistics cookies to see how everything performs. For non-essential cookies we first ask your consent via the cookie banner. Details are in the cookie statement on the website.

## 10. Complaints and changes

If we cannot work it out together, you can lodge a complaint with the Dutch Data Protection Authority ([autoriteitpersoonsgegevens.nl](https://autoriteitpersoonsgegevens.nl)). But call or email us first — we prefer to solve it together. If we materially change this statement, we announce it via the portal or by email. Each version is numbered and remains available.