

Privacy & cookies.

New Pathways – Coaching and Training, located at Potgieterstraat 5, 3842 XX, Harderwijk, registered with the Kamer van Koophandel (Chamber of Commerce) under number 98757911, attaches great importance to the protection of your personal data and privacy. This document explains how we handle your data, your rights, and how we use cookies.

1. Data controller New Pathways is responsible for the processing of your personal data as described in this statement.

2. What data do we collect? We only collect data that you actively provide to us, for example, via the contact form, introductory requests, or in preparation for a coaching program. This may include:

- Name, address, email address, telephone number
- Information provided via online contact forms
- Brief notes taken during a coaching session
- Special personal data (for example about health) if relevant to the coaching process

3. Purposes of data processing We process your personal data for the following purposes:

- To contact you and schedule appointments
- For preparing and carrying out a coaching or training service
- For invoicing and administration
- To comply with legal obligations

4. Legal basis We process personal data on the basis of:

- Your explicit consent
- The execution of an agreement
- Comply with a legal obligation

5. Special personal data: We only process special data if you provide it voluntarily and solely for the purpose of coaching or training. This data is kept strictly confidential and is not shared with third parties.

6. Sharing with third parties New Pathways does not share your data with third parties, unless this is strictly necessary for the execution of the agreement (for example, an accountant or software suppliers) and always under strict conditions and confidentiality.

7. Processors outside the EU: Services such as Google Drive, One Drive may be used for digital storage. We ensure that data transfers comply with applicable privacy laws (such as the EU-US Data Privacy Framework).

8. Data Security We take appropriate technical and organizational measures to protect your data. These include:

- SSL certificates for secure connections
- Password protection
- Limited access to data

9. Cookies New Pathways only uses functional and anonymized analytical cookies for:

- A well-functioning website
- Insight into visitor behaviour (for example via Google Analytics with anonymized IP)

10. Social media and external links. Our website contains links to social media channels and external websites. New Pathways is not responsible for the handling of personal data by these third parties. We refer you to their own privacy statements.

11. Disabling Cookies You can disable or delete cookies through your browser settings. Consult your browser's help function or visit www.youronlinechoices.com.

12. Retention period We do not store your data for longer than necessary:

- Contact details: up to 1 year after last contact moment
- Administrative data: in accordance with tax retention obligation (7 years)
- Special personal data: up to a maximum of 3 years after completion of the coaching process

13. Your rights You have the right to:

- Access to your personal data
- Correction of incorrect data
- Deletion of your data (right to be forgotten)
- Restriction of processing
- Objection to processing
- Data portability

You can email your request john@newpathways.nl. We will respond within four weeks.

14. Complaints: Do you have a complaint about how we handle your data? Please contact us at the email address above. If we are unable to resolve the issue, you can file a complaint with the Dutch Data Protection Authority via www.autoriteitpersoonsgegevens.nl.

15. Changes to this statement. New Pathways reserves the right to amend this privacy and cookie statement. The most current version is always available on our website.