Privacy Policy – Xaurum B.V.

1. Who is responsible for processing your data?
Xaurum B.V., located at Charles Petitweg 37-A2, 4827 HJ Breda, the Netherlands, is responsible for the processing of personal data as described in this privacy policy.

Contact details:

- Phone: +31 (0)76 549 99 99
- Email: info@xaurum.nl

2. When does this privacy policy apply?
This privacy policy applies to all services and software applications provided by Xaurum B.V., including PE-online.

It applies to anyone using one or more of these services, whether through the website, mobile apps, or integrations with systems of professional associations or educational institutions.

3. What data do we process?
Xaurum only processes personal data necessary to provide its services. This may include the following categories:

Category	Examples
Account and organization data	name of institution or organization, address, Chamber of Commerce number, contact person
Contact details	name, job title, phone number, email address, IP address
Usage and learning data	login details, course information, results, progress, evaluation responses
Technical data	device and browser information, usage statistics, security logs
Billing data	payment details, billing address, VAT number
Specific service data	accreditation requests, test results, evaluation forms, or FLA declarations

Xaurum does not process special categories of personal data unless strictly necessary for the execution of services and with your explicit consent.

4. Purposes and legal bases
Your personal data are processed for the following purposes:

Purpose	Legal base (art. 6 AVG)
Creating and managing user or provider accounts	Performance of a contract

Purpose	Legal base (art. 6 AVG)
Processing accreditation, test, learning, or evaluation data	Performance of a contract
Managing and improving our software and services	Legitimate interest
Customer communication and support	Legitimate interest
Billing, administration, and compliance with legal obligations	Legal obligation
Security and fraud prevention	Legitimate interest
Use of cookies or analytics tools (if applicable)	Consent (if required)

5. From whom do we receive data?

We receive personal data:

- Directly from you when you create an account or use our services;
- From your organization or professional association if you gain access through them to a Xaurum platform;
- Automatically through the use of our websites or apps (e.g., IP address, login activity, cookies).

6. With whom do we share data?

We only share your data with third parties when necessary to deliver our services or to comply with legal obligations.

- **Professional associations or educational institutions:** Only when you submit a request or registration via them (e.g., PE-online or FLA).
- **IT and hosting partners:** That provide technical support for Xaurum's systems. Data processing agreements are in place in accordance with Article 28 GDPR.
- Legitimate interest Only when legally required.

Xaurum does not sell personal data to third parties.

7. Retention periods

We do not retain personal data longer than necessary for the purpose for which they were collected, unless a statutory retention period applies.

Data type	Retention period
Account and accreditation data	7 years after termination of services
Technical log and security data	1 year
Financial administration	7 years (tax requirement)
Evaluation and learning data	As long as the organization or user is active or while the accreditation process is ongoing

8. Where are your data stored?
Your data are stored exclusively within the European Economic Area (EEA).
Xaurum's services are hosted in the Netherlands by an ISO 27001 and NEN 7510 certified provider, specialized in secure data storage for educational and healthcare applications.

No data transfers take place outside the EEA unless Xaurum has implemented appropriate safeguards in accordance with the GDPR (such as EU Standard Contractual Clauses).

9. How do we protect your data?
Xaurum implements technical and organizational measures to protect your data, including:

- Encryption of data during transmission (SSL/TLS)
- Strict access controls and multi-factor authentication
- Regular security testing by internal and external specialists
- Continuous system monitoring and incident response procedures

10. Your rights
Under the GDPR, you have the following rights:

- Right of access to your data
- Right to rectification of incorrect data
- Right to erasure of your data ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object to processing based on legitimate interest

You can submit a request via info@xaurum.nl. We will respond within one month of receiving your request.

11. Complaints
If you believe that Xaurum is not handling your data carefully, please contact us via info@xaurum.nl.

You also have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) via www.autoriteitpersoonsgegevens.nl.

12. Changes
Xaurum may amend this privacy policy. The most recent version is always available on our website or within the settings of the relevant application.