

PRIVACY STATEMENT – STICHTING INDUSTRIËLE REINIGING (SIR)

Version 2025-09 (September 2025)

1. INTRODUCTION

This privacy statement has been prepared by the Stichting Industriële Reiniging (SIR) and describes how we handle personal data. SIR processes personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws and regulations.

2. CONTROLLER

SIR is the controller for the processing activities mentioned in this statement, unless explicitly stated otherwise.

Contact details:

Stichting Industriële Reiniging (SIR)
Oud Camp 12, 3155 DL Maasland
E-mail: team@sir-safe.nl
Telephone: + 31 (0)10 591 4001

Privacy Contact Person (PC)

SIR has an internal Privacy Contact Person for privacy matters. You can reach this person via the general e-mail address with the subject line 'Attn: PC'.

3. PURPOSES OF PROCESSING

SIR processes personal data solely for the following purposes:

- › Registration, examination, and certification of employees in industrial cleaning.
- › Management of the participant administration of affiliated companies and inspection bodies, including registering contact persons and maintaining communication.
- › Management of personal data of invigilators and examiners, for selection, qualification management, exam assignment, communication, and administrative processing including invoicing and reimbursements.
- › Communication with participants and their contacts regarding professional developments, statutory matters, invitations to meetings, and other participant-related information.
- › Management of user accounts and access to digital systems (mijn.sir-safe.nl / SIR Safebook).
- › Communication about exams, certificates, and discipline-specific information (where consent has been given).
- › Quality assurance of examinations, including the use of bodycams (see section 12).
- › Legal obligations, such as fiscal retention requirements.

4. CATEGORIES OF PERSONAL DATA

We may process, among others, the following data:

- › **Identification data:** gender, initials, prefixes, surname, date of birth.
- › **Contact details:** e-mail address, telephone number, address (if provided by the candidate).
- › **Work-related data:** employer, certificates, exam results, certificate numbers.
- › **Technical data:** IP address, device ID, username, password (encrypted), geolocation (if enabled).



- › **Data of invigilators and examiners:** date of birth, certificates, qualifications, competencies, and information related to reimbursements.

5. LEGAL BASES FOR PROCESSING

Processing by SIR is based on:

- › Performance of a contract (Art. 6(1)(b) GDPR) – examination, certification, management of participant administration.
- › Legal obligation (Art. 6(1)(c) GDPR) – such as fiscal retention obligations.
- › Legitimate interest (Art. 6(1)(f) GDPR) – quality assurance, fraud prevention, protocol supervision, access systems.
- › Consent (Art. 6(1)(a) GDPR) – opt-in for receiving newsletters, professional information, or invitations to events and meetings.

6. RETENTION PERIODS

Personal data will not be retained longer than necessary for the purposes for which they were collected or further processed.

- › **Certificate history:** retained as long as relevant for quality assurance and verification of experience within the sector. Data subjects may always request deletion. In such cases, deletion occurs within 30 days unless a legal obligation applies.
- › **Invoices:** 7 years in accordance with fiscal law.
- › **Bodycam footage:** maximum of 4 weeks; longer if necessary for incident handling or appeal.
- › **Participant administration** (companies and contacts): as long as affiliation continues; up to 2 years after termination for administrative settlement.
- › **Working group and associate members:** as long as membership continues; up to 2 years after termination unless data is permanently required for archiving minutes or meeting records.
- › **Invigilators and examiners:** as long as active for SIR, up to 7 years after termination for administrative and fiscal purposes.
- › **Continued communication with former members:** only with consent, and deleted immediately upon withdrawal.

7. RECIPIENTS OF PERSONAL DATA

Personal data is only shared with:

- › Training institutes (applicants) for exam-related data.
- › Deltalinqs (via secure API) for access systems.
- › Software suppliers (Grand Design B.V., GoMotion B.V.) as processors.
- › Hosting provider TransIP B.V. (ISO 27001/ISO 9001 and NEN 7510 certified).
- › Government authorities when legally required.

Processor agreements are in place in accordance with the GDPR.

8. INTERNATIONAL DATA TRANSFER

Personal data is only processed within the European Economic Area (EEA). No transfers take place to third countries.

9. RIGHTS OF DATA SUBJECTS

You have the right of access, rectification, erasure, restriction of processing, data portability, and objection. Requests can be submitted to: team@sir-safe.nl. SIR verifies your identity before processing. We respond within 10 working days.



10. SECURITY MEASURES

We implement appropriate technical and organizational measures, including:

- › Encrypted connections (SSL/TLS).
- › Secure login systems (protection against brute force attacks).
- › Access control based on role and necessity.
- › Regular software updates and patches.
- › Secure hosting with an ISO 27001-certified provider.
- › Internal privacy procedures and staff training.

11. NOTIFICATION OF DATA BREACHES

SIR complies with the GDPR data breach notification requirement. In case of a data breach, the Dutch Data Protection Authority and, where necessary, affected individuals are notified within 72 hours.

12. USE OF BODYCAMs DURING EXAMINATIONS

SIR may use bodycams (Zepcam T3) worn by the solo examiner during certain exams. Purposes: quality control, protocol supervision, and ensuring objective examinations. Legal basis: legitimate interest. Footage is stored encrypted, retained up to 4 weeks (longer in case of incidents or appeals), and not shared with third parties unless legally required.

13. REPORTING AND PROCESSING OF INCIDENTS

Participants may report incidents to SIR to promote learning and improve safety in the sector. Processing such reports may include recording personal data (e.g., name and contact details of the reporter). This information is used internally only, discussed within a closed working group, and never published with names or organizations. Reports are archived as long as necessary for analysis and learning. Processing is based on SIR's legitimate interest in improving sector safety. Data subjects retain rights of access, correction, and erasure.

14. COOKIES

Our website uses only technically necessary cookies and privacy-friendly analytical tools. Google Analytics is used exclusively in anonymized form in accordance with GDPR.

15. COMPLAINTS

If you believe your personal data is being unlawfully processed, you may submit a complaint to SIR and, in disputes, to the Dutch Data Protection Authority.

16. CHANGES TO THIS PRIVACY STATEMENT

SIR reserves the right to amend this privacy statement. We recommend consulting this statement regularly. In case of material changes, participants will be actively informed via e-mail.

