

Privacy Statement Your Compass to Freedom

General

Your Compass to Freedom respects the privacy of its customers, prospective customers, participants and visitors to www.yourcompassstofreedom.com. This Privacy Statement explains which personal data Your Compass to Freedom processes, why those data are processed, the legal bases used, with whom data may be shared, how long data are retained and which rights you have under applicable data protection law.

The controller responsible for the processing of personal data is:

Your Compass to Freedom

A registered trade name operated by Ms W. de Vries

Dutch Chamber of Commerce (KvK): 78376866

Registered office: Oosterhout, the Netherlands

Website: www.yourcompassstofreedom.com

Current contact details for privacy questions or requests are available on the Website. You may use those contact details to exercise your privacy rights.

Which personal data does Your Compass to Freedom process?

Depending on how you use the Website, Digital Products, assessments, reports, Programmes or Services, Your Compass to Freedom may process the following categories of personal data:

- identification and contact details, such as your name, email address, telephone number and, where necessary, billing or address details;
- order, transaction and payment-related information. Payment card or bank details may be processed directly by a payment service provider and are not necessarily stored by Your Compass to Freedom;
- information you provide through forms, questionnaires, assessments, the Personal Compass Check or similar tools, including your answers, preferences, goals and other information you choose to submit;
- information necessary to generate, personalise, deliver or give access to Digital Products, reports, Programmes or Services;
- communications with Your Compass to Freedom, including customer-service enquiries, emails and information you voluntarily provide during coaching, sessions or Programmes;
- newsletter and marketing preferences, including whether you subscribed, unsubscribed or otherwise expressed a communication preference;
- technical and usage data, such as IP address, device or browser information, log data and information about the use of the Website, where collected;
- cookie and similar technology data where such technologies are used, subject to the applicable consent requirements;
- other personal data that are reasonably necessary to comply with legal obligations, prevent misuse, administer an Agreement or provide a product or service requested by you.

For which purposes and on which legal bases are personal data processed?

Your Compass to Freedom processes personal data only where there is a valid legal basis. Depending on the circumstances, data may be processed for the following purposes:

- to process orders, payments and purchases and to deliver Digital Products, personalised reports, Programmes or Services requested by you - where this is necessary to enter into or perform an Agreement;
- to create and provide access to customer environments, downloads, assessments, results or other purchased content - where necessary to perform an Agreement;
- to communicate with you about an order, Programme, Service, appointment, support request or other contractual matter - where necessary to perform an Agreement or, where appropriate, based on a legitimate interest in customer service and administration;
- to issue invoices, maintain financial records and comply with tax, accounting and other legal obligations - where necessary to comply with a legal obligation;
- to send newsletters, promotional emails or other direct marketing communications - where consent is required, on the basis of your consent; or where applicable law permits communications to existing customers without separate consent, on the basis permitted by that law. You can unsubscribe from marketing communications at any time;
- to improve, secure, maintain and analyse the Website, Digital Products and Services, prevent misuse and resolve technical problems - where based on a legitimate interest, provided that your interests and fundamental rights do not override that interest, or on consent where consent is legally required;
- to use analytics, advertising or other non-essential cookies and similar technologies - on the basis of consent where required by law;
- to establish, exercise or defend legal claims and protect the rights and interests of Your Compass to Freedom - where there is a legitimate interest or another applicable legal basis.

Where processing is based on consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

Personal Compass Check, assessments and information you choose to provide

Some products or tools may invite you to answer questions about your life, preferences, goals, experiences or circumstances in order to generate a result, report or recommendation. Your Compass to Freedom processes the information you submit for the purpose explained when you use the relevant tool and, where applicable, to perform the Agreement with you.

Please do not submit special-category personal data, such as detailed medical information, information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data, or information concerning sex life or sexual orientation, unless the relevant product or Service specifically requests such information and an appropriate legal basis has been established. If you voluntarily provide unnecessary sensitive information, Your Compass to Freedom may delete it where appropriate.

Newsletters and marketing

If you subscribe to a newsletter or other marketing communication, Your Compass to Freedom may use your contact details and relevant communication preferences to send that content. Every electronic marketing message will provide an appropriate way to unsubscribe where required. Unsubscribing from marketing does not prevent Your Compass to Freedom from sending necessary transactional or service-related communications about an existing purchase or Agreement.

Cookies and similar technologies

The Website may use functional cookies and similar technologies that are necessary for the Website to operate. Analytics, advertising or other non-essential technologies will only be used in accordance with applicable cookie and privacy rules, including obtaining consent where required. More detailed and current information about the technologies used and your choices may be provided through the Website's cookie banner, cookie settings or cookie information.

With whom does Your Compass to Freedom share personal data?

Your Compass to Freedom does not sell personal data. Personal data may be shared with service providers or other recipients only where this is reasonably necessary for the purposes described in this Privacy Statement, where required by law, or where another valid legal basis applies.

Depending on the services used at a particular time, categories of recipients may include:

- website, hosting, cloud-storage and technical service providers;
- payment service providers, banks, bookkeeping and accounting providers;
- email, newsletter and customer-communication providers;
- providers used for forms, assessments, automation, customer environments and delivery of Digital Products or Programmes;
- appointment-scheduling, video-conferencing or communication providers where relevant to Services or Programmes;
- analytics, security and fraud-prevention providers and, where consent has been obtained where required, advertising or marketing technology providers;
- professional advisers, insurers, authorities or other parties where disclosure is required by law or reasonably necessary to establish, exercise or defend legal claims.

Where a service provider processes personal data on behalf of Your Compass to Freedom, appropriate contractual and organisational arrangements are used where required by law.

International transfers

Some service providers may process personal data outside the European Economic Area (EEA). Where personal data are transferred to a country outside the EEA, Your Compass to Freedom will rely on a transfer mechanism permitted by applicable data protection law, such as an adequacy decision of the European Commission or appropriate safeguards such as the European Commission's Standard Contractual Clauses, together with supplementary measures where required. Information about applicable safeguards may be requested using the contact details on the Website.

How long does Your Compass to Freedom retain personal data?

Personal data are not retained longer than necessary for the purpose for which they were collected, unless a longer period is required or justified by law. Because different data serve different purposes, retention periods may vary.

- financial and administrative records are retained for the period required under applicable tax and accounting law;
- order and customer records are retained for as long as reasonably necessary to administer the purchase, provide access where applicable, handle questions or complaints and establish or defend legal claims;
- data submitted for an assessment, report, Digital Product or Programme are retained for as long as necessary to provide the relevant product or service and for any reasonable follow-up or support period, unless a longer period is required or you request deletion and no legal reason requires continued retention;
- newsletter and marketing data are retained until you unsubscribe, withdraw consent where consent is the basis, or the data are otherwise no longer needed, subject to keeping limited suppression information where necessary to respect your opt-out;
- technical, security and analytics data are retained according to the purpose of the relevant technology and are periodically reviewed.

Where it is not possible to state a fixed retention period, Your Compass to Freedom determines the period by considering the purpose of the processing, the nature and sensitivity of the data, legal obligations and the time for which the data remain necessary.

How does Your Compass to Freedom protect personal data?

Your Compass to Freedom takes appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Measures are selected according to the nature of the processing and the risks involved and may include access controls, passwords, secure connections, software and service-provider security measures, backups and limiting access to persons who need the data.

Your privacy rights

Subject to the conditions and exceptions in applicable law, you may have the following rights:

- the right to obtain information about and access to your personal data;
- the right to have inaccurate personal data corrected and incomplete data completed;
- the right to request deletion of personal data;
- the right to request restriction of processing;
- the right to object to processing, including an absolute right to object to processing for direct marketing purposes;
- the right to data portability where the legal requirements for that right are met;
- the right to withdraw consent at any time where processing is based on consent;
- the right not to be subject to a decision based solely on automated processing, including profiling, where that decision produces legal effects or similarly significantly affects you and the statutory conditions for that right apply;
- the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or, where applicable, another competent supervisory authority.

You may submit a privacy request using the contact details on the Website. Your Compass to Freedom may ask for information reasonably necessary to verify your identity before acting on a request. A copy of an identity document will not be requested as a standard requirement. Requests will be handled within the period required by applicable law, normally within one month. Where legally permitted, that period may be extended for complex or numerous requests, in which case you will be informed within the initial one-month period.

Automated decision-making

Your Compass to Freedom may use automated processes to calculate scores, generate assessment results or personalise reports based on information you provide. Unless explicitly stated otherwise, these processes are intended to provide content, reflection or recommendations and are not used to make decisions that produce legal effects concerning you or similarly significantly affect you. If this changes, the information required by applicable data protection law will be provided.

Changes to this Privacy Statement

Your Compass to Freedom may update this Privacy Statement when its products, services, technology or legal obligations change. The current version will be published on the Website. Where a change materially affects how personal data are processed, additional notice will be provided where required by law.

Last updated: 27 August 2026