

## PRIVACY POLICY (AVG/GDPR)

### Govert van Ginkel>Bridging Spaces Algemene verordening gegevensbescherming (AVG) 2026

**Last Updated: February 1st, 2026]**

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## INTRODUCTION

This privacy policy explains how Govert van Ginkel > Bridging Spaces collects, uses, stores, and protects your personal data in accordance with the General Data Protection Regulation (GDPR) and the Dutch Implementation Act (Algemene Verordening Gegevensbescherming - AVG).

You can visit this website without telling us who you are or revealing any personal information. We do not automatically collect personal information unless you voluntarily provide it through contact forms, service requests, or registrations.

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## IDENTITY AND CONTACT DETAILS

**Data Controller:**

Govert van Ginkel > Bridging Spaces  
Vrekenhorst 50  
3905 VL Veenendaal  
The Netherlands

**Contact:**

Website: <https://www.govertvanginkel.nl>  
Email: [mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl)  
Phone: +31 6 21 22 73 51

**Data Protection Officer:**

Govert van Ginkel serves as the Data Protection Officer and can be reached at [mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl)

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## PERSONAL DATA WE PROCESS

Govert van Ginkel > Bridging Spaces processes your personal data when you use our services and/or when you provide this data to us yourself.

Below is an overview of the personal data we process:

- First and last name
- Gender
- Address
- Phone number
- Email address
- Bank account number (for invoicing purposes only)

We only collect this information when you voluntarily provide it to us through:

Govert van Ginkel  
Vrekenhorst 50  
3905VL Veenendaal  
06-21227351

[www.govertvanginkel.nl](http://www.govertvanginkel.nl)  
[mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl)  
[www.bridgingspaces.nl](http://www.bridgingspaces.nl)  
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BTW nr. NL001313016B51  
IBAN NL88INGB0005450806  
BIC/SWIFT-code: INGBNL2A





- Contact forms on our website
- Email correspondence
- Service agreements and contracts
- Payment and invoicing processes
- Newsletter subscriptions (with consent)

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## CHILDREN'S PRIVACY

Our website and services are **not** directed at individuals under the age of 16. We do not knowingly collect personal data from children under 16 without parental or guardian consent.

However, we cannot always verify whether a visitor is older than 16. We therefore encourage parents and guardians to be involved in their children's online activities to prevent data about children being collected without proper consent.

**If you believe we have collected personal data about a minor without proper consent**, please contact us immediately at [mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl), and we will delete this information promptly.

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## PURPOSES OF DATA PROCESSING

Govert van Ginkel > Bridging Spaces processes your personal data for the following purposes:

### Service Delivery:

- To deliver training, mediation, coaching, and consulting services
- To schedule and manage appointments
- To communicate about our services

### Administrative:

- To process payments and send invoices
- To maintain client records
- To fulfill legal obligations (tax administration)

### Communication:

- To respond to your inquiries via phone or email
- To inform you about changes to our services and products
- To send newsletters and informational materials (only with your consent)

### Legal Compliance:

- To comply with legal obligations, such as tax administration requirements

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## LEGAL BASIS FOR DATA PROCESSING

Govert van Ginkel > Bridging Spaces processes your personal data based on the following legal grounds under Articles 6 and 9 of the AVG/GDPR:

### 1. Contract Performance (Article 6(1)(b) AVG)

Processing necessary to perform our mediation, coaching, and consulting services, including:

- Name and contact details for communication
- Appointment scheduling and service delivery
- Client file management

### 2. Legal Obligation (Article 6(1)(c) AVG)

Processing required to comply with legal obligations, including:

- Tax administration and bookkeeping requirements
- Retention of invoices and financial records for 7 years (Dutch Tax Law)

### 3. Consent (Article 6(1)(a) AVG)

Processing based on your explicit consent for:

- Sending newsletters and promotional communications
- Marketing communications about our services

**You can withdraw consent at any time** via the unsubscribe link in emails or by contacting us. Withdrawal does not affect the lawfulness of processing before withdrawal.

### 4. Legitimate Interest (Article 6(1)(f) AVG)

Processing necessary for our legitimate business interests, including:

- Improving our services and website functionality
- Responding to inquiries and providing customer support
- Fraud prevention and security of our systems
- Internal administrative purposes

**You have the right to object to processing based on legitimate interest.**

## AUTOMATED DECISION-MAKING

Govert van Ginkel > Bridging Spaces **does not** make decisions based on automated processing that could have (significant) consequences for individuals. We do not use:

- Automated profiling systems
- Automated decision-making algorithms
- AI-based client assessment tools

All decisions regarding our services are made by human professionals.

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## DATA RETENTION PERIODS

Govert van Ginkel > Bridging Spaces retains your personal data only as long as necessary for the purposes stated in this policy and as required by law.

Data Category	Retention Period	Legal Basis
<b>Invoice data</b> (name, address, amount, date)	7 years after invoice date	Dutch Tax Law requirement
<b>Client contact information</b> (name, email, phone)	Duration of client relationship + 1 year	Contract performance + legitimate interest
<b>Correspondence and emails</b>	2 years after last contact	Contract performance + legitimate interest
<b>Mediation/coaching session notes</b>	For mediation 5 years after completion, for coaching 1 year after completion	Professional confidentiality
<b>Advice documents</b> provided to clients	2 years after delivery	Professional liability
<b>Newsletter subscriptions</b>	Until you unsubscribe	Consent (revocable anytime)
<b>Website analytics data</b>	14 months	Legitimate interest
<b>Contact form inquiries</b>	2 years after last response	Legitimate interest
<b>Payment transaction data</b>	7 years	Dutch Tax Law requirement

**After these periods**, data is securely deleted or anonymized unless:

- Longer retention is required by law
- Data is needed for legal claims or disputes
- You have provided explicit consent for longer retention

## NOTES FROM MEDIATION, COACHING, AND CONSULTING

### Confidentiality

Govert van Ginkel › Bridging Spaces sometimes takes written notes during mediation, coaching sessions, or for consulting purposes. **The content of these notes is strictly confidential** and subject to professional confidentiality obligations.

### Retention and Destruction

- **Session notes:** For mediation saved 5 years by legal requirement, for coaching 1 year after completion
- **Advice documents:** Retained for 2 years for professional liability purposes
- **No third-party sharing:** Information from these conversations will not be shared with third parties unless:
  - You have a legitimate interest in doing so, AND
  - You give your explicit written consent
  - Anonymized for the purpose of peer review

### Professional Standards

This practice complies with professional standards for mediators, coaches, and consultants regarding confidentiality and record-keeping.

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## SHARING DATA WITH THIRD PARTIES

### General Policy

Govert van Ginkel › Bridging Spaces **does not sell your data** to third parties. We only share your personal data when:

- Necessary for the execution of our agreement with you
- Required to comply with a legal obligation
- You have given explicit consent

### Third-Party Service Providers

To provide our services, we work with the following processors who may have access to your data under strict confidentiality and data processing agreements:

### Web Hosting & Technical Services

#### STRATO GmbH

Otto-Ostrowski-Straße 7  
10249 Berlin, Germany

Govert van Ginkel  
Vrekenhorst 50  
3905VL Veenendaal  
06-21227351

www.govertvanginkel.nl  
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- **Purpose:** Website hosting and email services
- **Data processed:** Website content, email communications
- **GDPR compliance:** Standard Contractual Clauses (EU-approved)
- **Location:** Germany (within EU/EEA)

## WPSherpa B.V.

Langstraat 38  
8245 GJ Lelystad  
The Netherlands

- **Purpose:** Website backup and maintenance
- **Data processed:** Website backups including any submitted forms

Web hosting provider DigitalOcean, LLC. Zekeringstraat 17A, 1014 BM Amsterdam

Email service provider: walter@wpsherpa.nl

Backup services used: 2026 DigitalOcean, LLC. Zekeringstraat 17A, 1014 BM Amsterdam

No CRM or client management software used

- **GDPR compliance:** EU-based processor with data processing agreement
- **Location:** The Netherlands (within EU/EEA)

## Banking Services

### ING Bank N.V.

The Netherlands

- **Purpose:** Processing payments and invoices
- **Data processed:** Name, invoice details, bank account numbers
- **GDPR compliance:** EU-regulated financial institution
- **Location:** The Netherlands (within EU/EEA)

## Social Media Integration

Our website includes social media buttons/plugins for **Facebook, Instagram, YouTube and LinkedIn**.

**Important:** When you interact with these buttons, the respective social media companies may receive information about your visit according to their own privacy policies. We do not control these cookies or data collection.

Please refer to:

- Facebook Privacy Policy: <https://www.facebook.com/privacy/explanation>
- Instagram: <https://privacycenter.instagram.com/policy>
- YouTube: <https://www.youtube.com/howyoutubeworks/privacy/>
- LinkedIn Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

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## Processor Agreements

All third-party processors are:

- GDPR/AVG-compliant
- Bound by data processing agreements
- Instructed to process data only for specified purposes
- Required to implement appropriate security measures

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## INTERNATIONAL DATA TRANSFERS

### Within the EU/EEA

Most of our service providers (STRATO GmbH in Germany, WPSherpa B.V. in the Netherlands, ING Bank in the Netherlands) process data **within the European Economic Area (EEA)**, ensuring full GDPR protection.

### Outside the EU/EEA

Some service providers (Google Analytics) may process data outside the EEA. When this occurs, we ensure adequate protection through:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- [Or: EU-US Data Privacy Framework certification]
- Equivalent data protection safeguards as required by GDPR

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## COOKIES AND SIMILAR TECHNOLOGIES

### What Are Cookies?

Cookies are small text files placed on your device when you visit our website. They help us improve website functionality and understand how visitors use our site.

#### Types of Cookies We Use

##### 1. *Strictly Necessary Cookies*

These cookies are essential for the website to function and cannot be disabled:

- **Session cookies:** Maintain your browsing session  
These cookies are temporarily stored on your device during your visit to a website. They are used to maintain your session. They expire as soon as you close your browser.





- **Security cookies:** *Enable secure HTTPS connections*  
These cookies are used to ensure the security of the connection. They help protect against various attacks, such as cross-site request forgery (CSRF) and other security risks that make browsing vulnerable.
- **Cookie consent storage:** Remember your cookie preferences

**Legal basis:** Necessary for website functionality (no consent required)

## 2. Analytical Cookies

We use Google Analytics to understand how visitors use our website and to improve user experience.

**Service:** Google Analytics 4

**Purpose:** Website statistics and visitor behavior analysis

**Data collected:**

- Pages visited
- Time spent on site
- Browser type and version
- Device type
- Anonymized IP address
- Geographic location (country/city level)

**Privacy settings:**

- IP anonymization: Enabled
- Data sharing with Google: Disabled
- Advertising features: Disabled

**Retention period:** 14 months

**Third-party processor:** Google LLC (USA)

**GDPR compliance:** Standard Contractual Clauses

**Your choices:**

- Opt-out browser plugin: <https://tools.google.com/dlpage/gaoptout>
- Manage via cookie banner on first visit
- Change preferences in browser settings

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**Legal basis:** Legitimate interest (you can object)

### 3. Marketing/Tracking Cookies

We do **NOT** use marketing or tracking cookies on our website.

### 4. Social Media Cookies

When you interact with social media buttons on our site (**Facebook, Instagram, YouTube or LinkedIn, etc.**), these platforms may place cookies according to their own privacy policies.

**Important:** We do not control these cookies. For information about how social media platforms use cookies, please refer to their privacy policies.

### Managing Your Cookie Preferences

*Via Cookie Banner*

When you first visit our website, you can accept or reject optional cookies via our cookie banner.

*Via Browser Settings*

You can manage or delete cookies through your browser settings:

- **Chrome:** Settings > Privacy and Security > Cookies
- **Firefox:** Options > Privacy & Security > Cookies
- **Safari:** Preferences > Privacy > Cookies
- **Edge:** Settings > Privacy > Cookies

**Note:** Disabling necessary cookies may affect website functionality.

### More Information

For more information about cookies and how to manage them, visit: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

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## YOUR RIGHTS UNDER AVG/GDPR

You have the following rights regarding your personal data under the AVG/GDPR:

### 1. Right of Access (Article 15 GDPR)

Request a copy of all personal data we hold about you, including:

- What data we process

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- Why we process it
- Who we share it with
- How long we keep it

## 2. Right to Rectification (Article 16 GDPR)

Correct inaccurate or incomplete personal data we hold about you.

## 3. Right to Erasure / "Right to be Forgotten" (Article 17 GDPR)

Request deletion of your personal data when:

- Data is no longer necessary for the purposes collected
- You withdraw consent (where processing was based on consent)
- You object to processing and there are no overriding legitimate grounds
- Data was processed unlawfully
- Legal obligation requires erasure

**Exceptions:** We cannot erase data when retention is required by law (e.g., 7-year tax retention).

## 4. Right to Restriction of Processing (Article 18 GDPR)

Limit how we use your data when:

- You contest the accuracy of the data
- Processing is unlawful but you don't want erasure
- We no longer need the data but you need it for legal claims
- You've objected to processing pending verification

## 5. Right to Data Portability (Article 20 GDPR)

Receive your personal data in a structured, commonly used, machine-readable format (e.g., CSV, PDF) and transmit it to another controller.

**Applies when:** Processing is based on consent or contract and carried out by automated means.

## 6. Right to Object (Article 21 GDPR)

Object to processing based on:

- **Legitimate interests:** We must stop unless we demonstrate compelling legitimate grounds
- **Direct marketing:** We must stop immediately (absolute right)

#### 7. Right to Withdraw Consent (Article 7(3) GDPR)

Withdraw consent at any time for processing based on consent (e.g., newsletters).

**Note:** Withdrawal doesn't affect the lawfulness of processing before withdrawal.

#### 8. Right to Lodge a Complaint (Article 77 GDPR)

File a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) if you believe we have violated your privacy rights.

## How to Exercise Your Rights

### Contact us:

- **Email:** [mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl)
- **Subject line:** "Privacy Request - [Your Name]"
- **Include:** Description of your request and which right(s) you wish to exercise

**Identity Verification:** To protect your privacy, we must verify your identity. Please include a copy of your ID with:

- **Redact (black out):** Passport photo, MRZ zone, passport/ID number, BSN (Citizen Service Number)
- **Keep visible:** Name, date of birth, document validity dates

### Response Time:

- **Standard:** Within 1 month of receiving your request
- **Complex cases:** May be extended by 2 additional months (we'll inform you of any extension and reasons)

**Free of Charge:** Exercising your rights is generally free. We may charge a reasonable fee for:

- Manifestly unfounded or excessive requests
- Additional copies of data (beyond the first free copy)

### Newsletter Unsubscribe

**Easy opt-out:** Click the "unsubscribe" link at the bottom of any newsletter email.

### Lodge a Complaint

#### Autoriteit Persoonsgegevens (Dutch DPA)

P.O. Box 93374  
2509 AJ The Hague  
The Netherlands

- **Website:** <https://autoriteitpersoonsgegevens.nl>
- **Complaint form:** <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>
- **Phone:** (+31) 070 - 888 85 00

## DATA PROTECTION AND SECURITY

Govert van Ginkel > Bridging Spaces takes the protection of your data seriously and implements appropriate technical and organizational measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized modification.

### Security Measures

#### Technical measures:

- Secure HTTPS connections (SSL/TLS encryption) for our website
- Password-protected systems and accounts
- Regular software updates and security patches
- Firewall protection
- Secure backup procedures through certified providers
- Encrypted data transmission

#### Organizational measures:

- Limited access to personal data (only authorized personnel)
- Confidentiality agreements with staff and processors
- Regular security awareness training
- Data processing agreements with all processors
- Physical security of office premises
- Incident response procedures

### Your Responsibility

While we implement strong security measures, you also play a role in protecting your information:

- Use strong, unique passwords
- Keep your login credentials confidential
- Use secure networks when accessing our services
- Report any security concerns immediately

### Reporting Security Issues

**If you believe your data is not properly secured or if there are indications of misuse, please contact us immediately:**

**Email:** mail@govertvanginkel.nl

**Subject:** "Security Issue - URGENT"

## DATA BREACH NOTIFICATION

In the unlikely event of a personal data breach that may result in a risk to your rights and freedoms, Govert van Ginkel › Bridging Spaces will:

### Our Obligations

#### To the Supervisory Authority (Autoriteit Persoonsgegevens):

- Report the breach within 72 hours of becoming aware of it (when required by law)
- Provide details of the breach, affected data, and mitigation measures

#### To Affected Individuals:

- Notify you without undue delay if the breach poses a high risk to your rights and freedoms
- Provide clear information in plain language

### What We'll Tell You

In case of a breach, we will inform you about:

- The nature of the breach and data involved
- Likely consequences of the breach
- Measures taken or proposed to address the breach
- Contact details for further information
- Recommendations for steps you can take to protect yourself

### Your Actions

If we notify you of a breach, we recommend:

- Following our guidance on protective measures
- Monitoring your accounts for suspicious activity
- Changing passwords if recommended
- Reporting any suspicious activity to us immediately

## CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time to reflect:

- Changes in our data processing practices
- New technologies or services
- Legal or regulatory requirements
- Industry best practices

### How We Notify You

For all changes:

- Post the updated policy on our website
- Update the "Last Updated" date at the top of this document
- Highlight significant changes at the top of the policy for 30 days

For material changes (affecting your rights or how we process data):

- Send email notification to registered users/clients
- Request new consent if required by law
- Provide summary of key changes

### Your Acceptance

**Continued use** of our services after changes take effect constitutes acceptance of the revised policy, unless the changes require your explicit consent.

**Review Regularly:** We encourage you to review this policy periodically to stay informed about how we protect your information.

### Version History

Current version: 2.0

Previous versions available upon request.



## CONTACT INFORMATION

### Data Protection Questions

For questions about this Privacy Policy, to exercise your rights, or for data protection concerns:

**Govert van Ginkel**

Data Protection Officer  
Vrekenhorst 50  
3905 VL Veenendaal  
The Netherlands

**Email:** [mail@govertvanginkel.nl](mailto:mail@govertvanginkel.nl)

**Phone:** +31 6 21 22 73 51

**Website:** [www.govertvanginkel.nl](http://www.govertvanginkel.nl)

**Response time:** We aim to respond to all privacy-related inquiries within 5 business days (formal requests within 1 month).

### Supervisory Authority

**Autoriteit Persoonsgegevens**

P.O. Box 93374  
2509 AJ The Hague  
The Netherlands

**Website:** <https://autoriteitpersoonsgegevens.nl>

**Phone:** (+31) 070 - 888 85 00

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## ADDITIONAL RESOURCES

- **Full GDPR text:** <https://gdpr-info.eu/>
- **Dutch AVG information:** <https://autoriteitpersoonsgegevens.nl/nl/onderwerpen/avg-europese-privacywetgeving>
- **Your data protection rights:** <https://autoriteitpersoonsgegevens.nl/nl/onderwerpen/privacy-rechten>

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**Last Updated: February 1st 2026**

**Version: 2.0**

**Language:** English

**[Nederlandse versie beschikbaar op verzoek / Dutch version available upon request]**

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## DISCLAIMER

### GOVERT VAN GINKEL | BRIDGING SPACES

**Last Updated:** February 1<sup>st</sup> 2026

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We request that you include at the bottom:

**© Govert van Ginkel, Vrekenhorst 50, 3905 LT Veenendaal, The Netherlands**  
**www.govertvanginkel.nl | mail@govertvanginkel.nl**

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Govert van Ginkel is not responsible for, and expressly disclaims all liability for, damages of any kind arising out of use, reference to, or reliance on such information. No guarantees or warranties, including (but not limited to) any express or implied warranties of merchantability or fitness for a particular use or purpose, are made by Govert van Ginkel with respect to such information.

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#### LINKS TO OTHER INTERNET SITES

At certain places on the govertvanginkel.nl and bridgingspaces.nl internet sites, live links to other Internet addresses can be accessed. Such external Internet addresses contain information created, published, maintained, or otherwise posted by institutions or organizations independent of Govert van Ginkel.

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Reference therein to any specific commercial product, process, or service by trade name, trademark, service mark, manufacturer, or otherwise, does not constitute or imply endorsement, recommendation, or favouring by Govert van Ginkel.

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