

# Privacy Statement

How AdviSven handles personal data · GDPR and Dutch UAVG

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This statement explains what personal data AdviSven collects, why, on what legal basis, how long it is kept and what rights you have. It is written for clients, contacts, suppliers and visitors to [advisven.nl](https://advisven.nl).

Version 1.0 — 10 August 2026. AdviSven may amend this statement; the current version is always published at [advisven.nl](https://advisven.nl) and states its date.

## 1 Who is responsible for your data

The controller is Sven van der Heide, trading under the name AdviSven, a sole proprietorship established at Boekelo 10, 6721 TG Bennekom, the Netherlands, registered with the Netherlands Chamber of Commerce under number 82326894.

Contact for any privacy question or request: [privacy@advisven.nl](mailto:privacy@advisven.nl).

AdviSven is not required to appoint a Data Protection Officer under Article 37 GDPR: it is not a public authority, its core activities do not involve regular and systematic monitoring of individuals on a large scale, and it does not process special categories of data on a large scale. Sven van der Heide handles privacy matters personally.

## 2 When AdviSven is a controller and when a processor

- 2.1 For its own client, prospect, supplier and website data, AdviSven acts as controller. This statement describes that processing.
- 2.2 Where AdviSven processes personal data on a client's behalf as part of an assignment, AdviSven acts as a processor and the client remains the controller. In engineering work this arises mainly with documents such as welder qualification records, WPS and WPQR documentation, inspector and witness names, operator logs and signed test certificates, which identify individuals.
- 2.3 In that case a data processing agreement (verwerkersovereenkomst) is concluded before processing begins, as required by Article 28 GDPR and as committed in Article 18.3 of the AdviSven General Terms and Conditions. AdviSven processes such data only on the client's documented instructions and only for the assignment.

## 3 Whose data is processed, and what data

AdviSven processes the following categories:

| Category of person | Personal data                                                                                                        |
|--------------------|----------------------------------------------------------------------------------------------------------------------|
| Client contacts    | Name, function, employer, business e-mail and telephone, correspondence, meeting and call notes, project involvement |

|                                       |                                                                                                                                                                            |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prospects and enquirers               | Name, employer, contact details and the content of the enquiry                                                                                                             |
| Suppliers and subcontractors          | Name, contact details, payment details, correspondence                                                                                                                     |
| Individuals named in client documents | Name, function, qualification and certification data appearing in inspection, welding and commissioning records (processed as processor — see section 2 of this statement) |
| Website visitors                      | Technical data such as IP address, browser type, pages visited, and anything entered in a contact form                                                                     |

AdviSven does not seek or require special categories of personal data (Article 9 GDPR), and does not process data relating to criminal convictions. It does not knowingly process data of children.

## 4 Why, and on what legal basis

| Purpose                                                        | Legal basis                                                                                |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Issuing quotations and performing assignments                  | Performance of a contract, or steps prior to entering one — Art. 6(1)(b)                   |
| Invoicing, payment and debt recovery                           | Performance of a contract — Art. 6(1)(b); legitimate interests for recovery — Art. 6(1)(f) |
| Keeping financial and fiscal records                           | Legal obligation — Art. 6(1)(c), in conjunction with Art. 52 AWR                           |
| Maintaining business relationships and responding to enquiries | Legitimate interests in operating and developing the business — Art. 6(1)(f)               |
| Occasional updates to existing clients about relevant services | Legitimate interests — Art. 6(1)(f), with an opt-out in every message                      |
| Sending a newsletter, if one is introduced                     | Consent — Art. 6(1)(a), withdrawable at any time                                           |
| Securing systems and preventing misuse                         | Legitimate interests — Art. 6(1)(f)                                                        |
| Establishing, exercising or defending legal claims             | Legitimate interests — Art. 6(1)(f)                                                        |
| Non-essential cookies and analytics                            | Consent — Art. 6(1)(a) and Art. 11.7a Telecommunicatiewet                                  |

Where processing rests on legitimate interests, AdviSven has weighed those interests against your rights and freedoms. You may object at any time — see section 8 of this statement.

## 5 How long data is kept

| Data                                                    | Retention period                                                                                                                                                                                               |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Financial and fiscal records, including invoices        | Seven years from the end of the financial year, per the statutory retention duty in Art. 52 AWR                                                                                                                |
| Project files, calculations, reports and correspondence | Seven years after completion of the assignment. This exceeds the twelve-month lapse period in Article 15.10 of the General Terms and Conditions, and is retained to evidence what was advised and on what data |

|                                              |                                                                                                                                                                                                        |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Client contact details                       | Until two years after the last contact, unless a longer fiscal period applies                                                                                                                          |
| Enquiries that do not lead to an assignment  | Twelve months from the last contact                                                                                                                                                                    |
| Personal data processed on a client's behalf | As instructed by the client in the data processing agreement; returned or deleted on completion                                                                                                        |
| Website and contact-form data                | Enquiry-form messages are delivered by e-mail and retained as under 'Enquiries' above. Nothing is stored in the website database. Server logs are retained by the host under its own retention period. |

## 6 Who else sees your data

AdviSven does not sell personal data and does not share it for advertising. Data is shared only where necessary, with:

- Moneybird BV, the accounting and invoicing software used by AdviSven, and the accountant, for financial administration and statutory bookkeeping;
- STRATO, which hosts advisven.nl and the associated mailboxes;
- legal advisers, a debt collection agency or a court, where a claim has to be pursued or defended;
- government authorities, where AdviSven is legally required to disclose.

Each of these acts as a processor under a data processing agreement, except the accountant and legal advisers, who are independent controllers bound by their own professional duties.

Client project documents are stored on storage operated by AdviSven itself rather than in a third-party cloud service. No external processor has access to those files.

## 7 Transfers outside the European Economic Area

AdviSven aims to use providers that store data within the EEA. Moneybird, the accounting and invoicing software used, hosts and processes personal data exclusively within the EEA. Client project documentation is held on storage operated by AdviSven itself in the Netherlands. Where a provider processes personal data outside the EEA, the transfer takes place under an adequacy decision of the European Commission or under the European Commission's Standard Contractual Clauses, with supplementary measures where required. Details of the providers used and the mechanism relied on are available on request.

## 8 Your rights

Under the GDPR you have the right to:

- access the personal data AdviSven holds about you (Art. 15);
- have inaccurate data corrected or incomplete data completed (Art. 16);
- have data erased where the grounds in Art. 17 apply;
- restrict processing in the situations set out in Art. 18;
- receive data you provided in a structured, machine-readable format, and have it transmitted to another controller (Art. 20);

- object to processing based on legitimate interests, including profiling (Art. 21). Where you object to direct marketing, processing stops immediately;
- withdraw consent at any time, without affecting the lawfulness of processing before withdrawal.

AdviSven does not carry out automated decision-making producing legal or similarly significant effects, within the meaning of Art. 22.

To exercise a right, contact [privacy@advisven.nl](mailto:privacy@advisven.nl). AdviSven responds within one month, extendable by two months for complex requests, and will tell you if that extension is needed. Identification may be requested where there is reasonable doubt about who is making the request.

If your request concerns data AdviSven processes on a client's behalf, AdviSven will refer you to that client as controller and assist them in responding.

## 9 Security

AdviSven takes appropriate technical and organisational measures under Article 32 GDPR, including:

- storage on systems operated by AdviSven, with encrypted backups;
- multi-factor authentication on business accounts;
- a password manager and unique credentials per service;
- prompt installation of security updates;
- access limited to Sven van der Heide alone;
- confidentiality obligations towards clients under Article 17 of the General Terms and Conditions.

## 10 Software tools and artificial intelligence

AdviSven uses software tools, including tools that apply artificial intelligence, in preparing advice and documents. AdviSven remains fully responsible for the content and correctness of everything it delivers.

AdviSven does not enter confidential client information or personal data into any tool or service that uses that information to train or improve models, or that retains it beyond what is necessary to provide the service and to comply with law, unless the client has given prior written consent. This mirrors Articles 4.10 and 17.6 of the General Terms and Conditions.

## 11 Cookies

[advisven.nl](https://advisven.nl) places only strictly necessary cookies. The site runs no analytics, no tracking and no advertising cookies, and sets nothing that requires prior consent under Article 11.7a Telecommunicatiewet. For that reason no consent banner is shown. The site is hosted by STRATO within the European Union; the host's server logs may record your IP address for security and troubleshooting, and are not used to build a profile of visitors.

## 12 Data breaches

If a personal data breach occurs, AdviSven assesses it without delay and reports it to the Autoriteit Persoonsgegevens within 72 hours where the breach is likely to result in a risk to the rights and freedoms of individuals. Where the risk is high, affected individuals are informed directly. Where the breach concerns data processed on a client's behalf, the client is notified without undue delay so that they can meet their own obligations.

## 13 Complaints

If you believe AdviSven has not handled your data properly, please raise it first at [privacy@advisven.nl](mailto:privacy@advisven.nl) — most matters are resolved quickly.

You also have the right to lodge a complaint with the Dutch supervisory authority: Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ Den Haag, [autoriteitpersoonsgegevens.nl](https://autoriteitpersoonsgegevens.nl).

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