

ADRA Nederland

Privacy Notice

Version 1.0 | March 2026

Data Controller

ADRA Nederland (Stichting)
Huis ter Heide, The Netherlands
E: privacy@adra.nl
W: www.adra.nl

Supervisory Authority

Autoriteit Persoonsgegevens (AP)
Bezuidenhoutseweg 30
2594 AV Den Haag
W: www.autoriteitpersoonsgegevens.nl
T: +31 (0)70 888 8500

1. Introduction

ADRA Nederland ("ADRA Nederland", "we", "us", "our") is the Dutch office of the Adventist Development and Relief Agency (ADRA), a global humanitarian organisation of the Seventh-day Adventist Church. ADRA Nederland works to fight poverty, promote equal opportunities, and deliver sustainable development and emergency relief in the Netherlands and internationally — guided by the values of Justice, Compassion, and Love.

In the course of our work we process personal data relating to our donors, volunteers, staff, partners, programme beneficiaries, and website users. We are committed to handling all personal data responsibly, transparently, and in full compliance with:

- Regulation (EU) 2016/679 (the General Data Protection Regulation — GDPR);
- The Uitvoeringswet Algemene Verordening Gegevensbescherming (UAVG), the Dutch GDPR Implementation Act;
- Any sector-specific legislation applicable to our activities (including the Wet op de Loonbelasting, the Wet ter voorkoming van witwassen en financieren van terrorisme (WWFT), and the Archiefwet).

This Privacy Notice explains who we are, what personal data we process, why we process it, how long we retain it, with whom we share it, what rights you have, and how to exercise them. A Dutch-language version is available on request.

2. Scope of This Policy

This Policy applies to all personal data processing activities carried out by ADRA Nederland as data controller. It covers:

- Visitors to our website (www.adra.nl);
- Donors, supporters, and fundraisers;
- Volunteers and programme participants based in the Netherlands;
- ADRA Nederland employees, contractors, and interns;
- Partner organisations, institutional donors, and governmental bodies;
- Beneficiaries reached through our humanitarian and development programmes;
- Media contacts and advocacy stakeholders.

This Policy does not apply to the processing activities of ADRA International, ADRA Europe, or other ADRA network offices, each of which is an independent data controller subject to its own applicable law. Where ADRA Nederland shares data with other ADRA network offices (for example, to administer a cross-border programme), the applicable transfer safeguards are described in Section 11.

3. Identity and Contact Details of the Data Controller

ADRA Nederland operates as a Stichting (foundation) registered under Dutch law. Our details are:

- **Legal name:** Stichting ADRA Nederland
- **Registered office:** Huis ter Heide, The Netherlands
- **Postal address:** Amersfoortseweg 18, 3712 BC Huis ter Heide
- **Chamber of Commerce (KvK):** 41184789
- **RSIN / ANBI number:** 800305589
- **Email:** info@adra.nl
- **Privacy contact:** geert@adra.nl
- **Website:** www.adra.nl

3.1 Data Protection Officer (DPO)

ADRA Nederland has appointed a Data Protection Officer (DPO) as required by Article 37 GDPR. The DPO monitors compliance with the GDPR and UAVG, provides advice on data protection matters, and serves as the point of contact for the Autoriteit Persoonsgegevens.

- **DPO name:** Geert Hendriks, directeur
- **Email:** geert@adra.nl
- **Address:** Amersfoortseweg 18, 3712 BC Huis ter Heide

The DPO operates with full independence and cannot receive instructions regarding the exercise of their tasks. The DPO is registered with the Autoriteit Persoonsgegevens in accordance with Article 37(7) GDPR.

4. Personal Data We Collect

4.1 Donors and Supporters

When you donate to ADRA Nederland, register for an event, or subscribe to our communications, we may collect:

- Full name, address, and contact details (email, telephone);
- Bank account number (IBAN) and payment information for recurring donations;
- Donation history and gift preferences;
- Communication preferences and consent records;
- Demographic information provided voluntarily (e.g., year of birth, interests).

4.2 Volunteers

When you register as a volunteer, we may collect:

- Full name, address, date of birth, and contact details;
- Skills, qualifications, and availability;
- Emergency contact details;
- A Verklaring Omtrent Gedrag (VOG — Certificate of Good Conduct) for roles working with vulnerable groups. The VOG is verified and then promptly destroyed; we do not retain a copy.

4.3 Employees and Contractors

For employment and contractor relationships, we process HR data including:

- Identity documents and contact details;
- Burgerservicenummer (BSN) — processed exclusively for payroll tax administration (loonheffing) in accordance with Article 47 UAVG and the Wet op de Loonbelasting. The BSN is not used as a general employee identifier within our systems;
- Salary, bank account, and pension details;
- Health data strictly limited to sickness notification, reintegration support, and occupational health obligations under the Wet verbetering poortwachter and Article 30 UAVG;
- Performance and development information;
- Emergency contact details.

ADRA Nederland does not use employee health data for any purpose other than those mandated by law (reintegration and legally required notifications). Access to health data is strictly limited to the HR function and the occupational health physician (bedrijfsarts).

4.4 Programme Beneficiaries

In our humanitarian and development programmes, we may process personal data of beneficiaries. This can include:

- Name, age, gender, and household composition;
- Location data;
- Vulnerability or health-related information where strictly necessary for programme delivery (e.g., nutritional status, disability, displacement status);
- Programme participation records.

Beneficiary data involving special categories (health, ethnic origin, vulnerability) is processed only to the extent strictly necessary for programme delivery, under the basis of vital interests (Article 6(1)(d) GDPR) or substantial public interest (Article 6(1)(e) GDPR / UAVG Article 23), or explicit consent where obtainable. ADRA Nederland does not use beneficiary data for fundraising without separate, explicit consent.

4.5 Website Visitors

When you visit www.adra.nl, we collect:

- IP address and browser/device information (for security and analytics purposes);
- Cookie identifiers;
- Pages visited, time spent on the site, and referral source (analytics, only with consent for non-essential cookies);
- Information you provide via contact forms or newsletter subscriptions.

Non-essential cookies are only placed after explicit consent via our cookie consent banner, which provides an equally prominent "Reject" option in compliance with UAVG enforcement guidance and the Telecommunicatiewet.

4.6 Partner Organisations and Institutional Donors

We process contact details (names, email addresses, telephone numbers) of individuals at partner organisations, institutional donors, and governmental bodies for the purpose of managing our relationships and fulfilling grant and partnership obligations.

5. Legal Basis for Processing

Under the GDPR and the UAVG, we must have a valid legal basis for each processing activity. The table below summarises the Legal Basis we rely on.

Legal Basis	Processing Activities
Consent (Art. 6(1)(a) GDPR)	Newsletter subscriptions; non-essential cookies; direct marketing to new contacts; certain sensitive data processing (Art. 9(2)(a)) and in some cases emergency humanitarian response where the data subject is able to provide Consent while not in iminent danger.
Performance of a contract (Art. 6(1)(b) GDPR)	Processing personal data of employees, contractors, and service partners necessary to execute agreements.
Legal obligation (Art. 6(1)(c) GDPR)	Tax records (AWR); BSN processing in payroll; anti-money laundering checks (WWFT); mandatory reporting obligations.
Vital interests (Art. 6(1)(d) GDPR)	Emergency humanitarian response where the data subject or another person faces a life-threatening situation and consent cannot be obtained.
Public interest / official authority (Art. 6(1)(e) GDPR)	Delivery of publicly funded development programmes; activities carried out in cooperation with government bodies and institutional donors.
Legitimate interests (Art. 6(1)(f) GDPR)	Fraud prevention; IT and network security; relationship management with donors, partners, and press; volunteer management; programme monitoring and reporting.
Employment & social law – UAVG Art. 30	Employee health data processed for reintegration and sickness support, in accordance with UAVG and Wet verbetering poortwachter.
Substantial public interest – UAVG Art. 23 ff.	Processing of special categories (ethnic origin, health, vulnerability data) strictly necessary for ADRA's humanitarian and development mandate, with appropriate safeguards.

5.1 Special Categories of Personal Data

Certain categories of personal data receive heightened protection under Article 9 GDPR. The processing of such data is generally prohibited unless one of the exceptions in Article 9(2) applies. ADRA Nederland processes the following special categories in limited circumstances:

- **Health data:** of employees — for reintegration and sickness support obligations under Dutch law (UAVG Art. 30; Art. 9(2)(b) GDPR).
- **Health and vulnerability data:** of programme beneficiaries — strictly necessary for the delivery of humanitarian assistance (UAVG Art. 23; Art. 9(2)(g) GDPR), or based on explicit consent (Art. 9(2)(a) GDPR) where obtainable.
- **Racial or ethnic origin:** of beneficiaries in programmes targeting specific vulnerable minority groups, to ensure appropriate and culturally sensitive service delivery (UAVG Art. 23; Art. 9(2)(g) GDPR).

We do not process biometric data for identification purposes. If we were ever to adopt biometric access systems (e.g., building access), this would be permissible only where strictly necessary for security purposes and where no less intrusive alternative exists, in accordance with UAVG Article 29 and AP enforcement guidance. Any such system would be implemented only with a DPIA and, where applicable, Works Council approval.

5.2 BSN — Burgerservicenummer

The BSN is processed exclusively in the context of payroll administration and mandatory statutory reporting, as permitted by Article 47 UAVG. We strictly comply with the following requirements:

- The BSN is not used as a generic identifier in HR or CRM systems;
- Access to BSN records is limited to authorised payroll personnel;
- BSN data is stored separately from general HR records with enhanced access controls;
- BSN data is retained for the statutory period of 7 years as required by the Wet op de Loonbelasting, after which it is securely deleted.

6. Purposes of Processing

We process personal data for the following clearly defined purposes:

- **Programme delivery and humanitarian assistance:** Administering development and relief programmes in the Netherlands and partner countries.
- **Donor and supporter relations:** Processing donations, issuing gift receipts, and communicating about our work.
- **Fundraising communications:** Sending newsletters, appeals, and event invitations to those who have given consent or are existing donors (under the soft opt-in principle where applicable).
- **Volunteer management:** Recruiting, onboarding, scheduling, and supporting volunteers.
- **Employment and HR administration:** Managing the employment relationship, payroll, benefits, performance, and legal obligations.
- **Partnership and grant management:** Administering institutional grants, reporting to donors, and managing partner relationships.
- **Website operation and improvement:** Ensuring the security and functionality of www.adra.nl and improving user experience.
- **Legal and regulatory compliance:** Fulfilling obligations under Dutch and EU law, including tax, anti-money laundering, and reporting requirements.
- **Fraud prevention and security:** Protecting ADRA Nederland's assets and safeguarding our stakeholders.

We do not use personal data for automated decision-making with significant legal or similarly significant effects (Article 22 GDPR). We do not sell personal data to third parties. We do not engage in profiling for commercial targeting.

7. Retention Periods

Personal data is retained only for as long as necessary for the purposes for which it was collected, or as required by law. The table below provides an overview of our retention periods by data subject category. Where a legal obligation requires a longer retention period, that obligation takes precedence.

Data Subject Category	Personal Data Processed	Retention Period	Legal Basis
Donors & supporters	Name, address, donation history, IBAN (for recurring gifts)	7 years after last transaction (Art. 52 AWR)	Legal obligation (tax); legitimate interest (relationship management)
Programme beneficiaries	Name, contact, vulnerability/health data (where collected for programme delivery)	5 years after programme end, or as required by funder contract	Public interest / vital interests (Art. 9(2)(g/c) GDPR; UAVG Art. 23)
Volunteers	Name, contact, skills, emergency contact, criminal record extract (VOG)	2 years after end of engagement (VOG: destroyed after verification)	Legitimate interest; legal obligation (WWFT where applicable)
Employees & contractors	HR data, BSN (payroll only), health data (reintegration)	BSN in payroll: 7 years; HR records: 2 years after end of employment	Legal obligation (Art. 6(1)(c)); UAVG Art. 30 (health/reintegration)
Website visitors	IP address, cookie identifiers, analytics data	Analytics: 13 months. Functional cookies: session or 1 year	Consent (where required); legitimate interest (security/analytics)
Partner organisations	Contact person name, email, phone, correspondence	5 years after end of partnership	Legitimate interest; performance of contract
Press / media contacts	Name, outlet, email, coverage history	3 years after last contact	Legitimate interest

Upon expiry of the applicable retention period, personal data is securely deleted or irreversibly anonymised. Physical documents containing personal data are shredded. Our IT team maintains a data deletion schedule aligned with this Policy.

8. Sharing of Personal Data

8.1 Third-Party Service Providers (Processors)

We engage third-party service providers who process personal data on our behalf as data processors. These include:

- IT and cloud service providers (hosting, email, CRM, donor management platforms);
- Payment processors (for donation processing);
- Payroll and HR administration services;
- Communication and mailing services (for newsletters and direct mail);
- Audit, accounting, and legal advisory firms.

All processors are bound by Data Processing Agreements (DPAs) compliant with Article 28 GDPR, which require them to process data only on our documented instructions and to implement appropriate technical and organisational security measures.

8.2 ADRA Network Partners

We may share personal data with other ADRA offices in the global network where this is necessary to administer a joint programme or respond to an international emergency. Each ADRA office receiving data is a separate data controller and is required to process the data in accordance with applicable data protection law. Appropriate transfer safeguards are applied as described in Section 11.

8.3 Institutional Donors and Government Bodies

We may share programme data (including beneficiary information in anonymised or pseudonymised form where possible) with institutional donors (e.g., the Dutch Ministry of Foreign Affairs, the European Commission, UN agencies) and partner governments for programme monitoring, evaluation, and reporting purposes. We apply data minimisation principles and use anonymised data wherever the reporting requirement permits.

8.4 Legal Disclosure

We may disclose personal data to competent authorities (including the Autoriteit Persoonsgegevens, the Belastingdienst, the Financiële Inlichtingen Eenheid, or law enforcement) where required to do so by law or by a binding court order.

8.5 No Sale of Personal Data

ADRA Nederland does not sell, rent, or trade personal data to any third party for commercial purposes.

9. Cookies and Online Tracking

Our website uses cookies and similar tracking technologies. We distinguish between:

- **Strictly necessary cookies:** Required for the basic functioning of the website (e.g., session management, security). These are placed without consent on the basis of our legitimate interest in operating a secure website.
- **Functional cookies:** Remember your preferences (e.g., language settings). Placed with consent or on the basis of legitimate interest.
- **Analytics cookies:** Used to understand how visitors interact with our website (we use privacy-friendly analytics tools with IP anonymisation). Placed only with your consent.

- **Marketing/tracking cookies:** ADRA Nederland does not use third-party advertising or tracking cookies.

When you first visit www.adra.nl, you will be presented with a cookie consent banner that provides a clearly visible and equally prominent option to accept or reject non-essential cookies. Consent can be withdrawn at any time via the cookie settings link in the website footer. Pre-ticking or implied consent is not used.

10. Security Measures

ADRA Nederland implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access — in accordance with Article 32 GDPR and consistent with the AP's guidelines on information security. Our measures include:

- Encryption of data in transit (TLS/SSL) and, for sensitive categories, at rest;
- Role-based access controls ensuring that staff can only access data necessary for their function;
- Two-factor authentication for systems containing personal data;
- Regular security patching and vulnerability management;
- Staff training on data protection and information security;
- Physical access controls for offices and server infrastructure;
- Processor due diligence and contractual security requirements in all DPAs;
- An Information Security Policy aligned with ISO 27001 principles.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of natural persons, we will notify the Autoriteit Persoonsgegevens without undue delay and within 72 hours of becoming aware, in accordance with Article 33 GDPR. Where the breach is likely to result in a high risk, we will also notify the affected data subjects without undue delay (Article 34 GDPR). ADRA Nederland maintains a Personal Data Breach Register.

11. International Data Transfers

Given our global humanitarian mission, it may be necessary to transfer personal data outside the European Economic Area (EEA). We only do so where:

- The European Commission has adopted an adequacy decision for the destination country (Article 45 GDPR);
- Appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) approved by the European Commission (Article 46 GDPR); or
- A derogation under Article 49 GDPR applies — most commonly, the transfer is necessary for the performance of a contract (e.g., a development programme), or to protect the vital interests of the data subject in emergency situations.

For transfers to other ADRA network offices, we rely on Standard Contractual Clauses supplemented by a Transfer Impact Assessment (TIA) for transfers to countries without an adequacy decision. We document all international transfers in our Records of Processing Activities (RoPA).

ADRA Nederland does not transfer beneficiary data containing special categories of personal data across borders unless the transfer is strictly necessary for programme delivery and is covered by one of the above mechanisms.

12. Your Rights as a Data Subject

Under the GDPR and the UAVG, you have the following rights with respect to your personal data. These rights are not absolute and are subject to certain conditions and exceptions provided by law.

Right	What it means	How we handle it
Right of access (Art. 15 GDPR)	Request a copy of all personal data held about you.	We respond within 1 month. Extension of 2 months possible for complex requests.
Right to rectification (Art. 16 GDPR)	Correct inaccurate or incomplete data.	Actioned without undue delay.
Right to erasure (Art. 17 GDPR)	Request deletion where data is no longer necessary, consent is withdrawn, or processing is unlawful.	We assess and respond within 1 month. Legal retention obligations may override.
Right to restriction (Art. 18 GDPR)	Restrict processing while accuracy or legality is contested.	Processing suspended pending review.
Right to data portability (Art. 20 GDPR)	Receive data in a structured, commonly used format (applies to consent-based or contract-based processing carried out by automated means).	Provided in CSV or PDF within 1 month.
Right to object (Art. 21 GDPR)	Object to processing based on legitimate interests or for direct marketing.	Direct marketing: honoured immediately. Other objections: assessed on merits.
Right not to be subject to automated decisions (Art. 22 GDPR)	Not to be subject to solely automated decisions with significant effects.	ADRA Nederland does not employ automated decision-making.
Right to withdraw consent (Art. 7(3) GDPR)	Withdraw consent at any time without affecting the lawfulness of prior processing.	Processed immediately; no adverse consequences.
Right to lodge a complaint (Art. 77 GDPR)	Lodge a complaint with the Autoriteit Persoonsgegevens.	You may also contact us first; we aim to resolve complaints within 30 days.

12.1 How to Exercise Your Rights

To exercise any of your rights, please submit a request to:

- Email: privacy@adra.nl
- Post: ADRA Nederland, Attn: Privacy, Amersfoortseweg 18, 3712 BC Huis ter Heide

We will verify your identity before processing the request, to ensure we do not disclose data to unauthorised persons. We will respond within one month of receipt. Where requests are complex or numerous, we may extend this period by a further two months; we will inform you of any extension within one month, stating the reasons for the delay.

There is no charge for exercising your rights unless requests are manifestly unfounded or excessive. In such cases, we may charge a reasonable administrative fee or refuse to act, providing reasons for our decision.

12.2 Right to Lodge a Complaint

If you believe that ADRA Nederland is not processing your personal data in accordance with applicable law, you have the right to lodge a complaint with the Autoriteit Persoonsgegevens:

- Website: www.autoriteitpersoonsgegevens.nl
- Address: Bezuidenhoutseweg 30, 2594 AV Den Haag
- Telephone: +31 (0)70 888 8500

We encourage you to contact us directly first (info@adra.nl) so that we have the opportunity to address your concern. We commit to responding to all privacy complaints within 30 calendar days.

13. Children's Data

ADRA Nederland's website and general communication channels are not directed at children under the age of 18. In the Netherlands, the minimum age for valid consent to information society services is 18 years (UAVG Article 5(1); Article 8(1) GDPR).

If you are under 18, you may not provide personal data through our website or communication channels without verifiable parental or guardian consent. If we become aware that we have collected personal data from a child under 18 without such consent, we will delete it promptly.

In our humanitarian programmes, we process personal data of minors solely to the extent necessary for programme delivery (e.g., child-focused education and nutrition programmes), on the basis of the vital interests of the child, parental/guardian consent, or substantial public interest, and with appropriate safeguards in place. We do not use imagery or data of children for fundraising or advocacy without explicit parental/guardian consent.

14. Records of Processing Activities (RoPA)

As required by Article 30 GDPR, ADRA Nederland maintains a written Record of Processing Activities (RoPA). This document records, for each processing activity:

- The name and contact details of the controller and, where applicable, the joint controller, the controller's representative, and the DPO;
- The purposes of processing;
- A description of the categories of data subjects and personal data;
- The categories of recipients;
- Details of international transfers and the applicable safeguards;
- Planned retention periods;
- A description of technical and organisational security measures.

The RoPA is reviewed and updated at least annually, or following any material change to our processing activities. It is made available to the Autoriteit Persoonsgegevens on request.

15. Data Protection Impact Assessments (DPIAs)

ADRA Nederland conducts Data Protection Impact Assessments (DPIAs) in accordance with Article 35 GDPR and the AP's published list of processing activities requiring a mandatory DPIA. DPIAs are carried out before initiating any processing activity that is likely to result in a high risk to the rights and freedoms of natural persons, including:

- Systematic processing of health or vulnerability data of beneficiaries;
- Introduction of any new technology involving large-scale processing of personal data;

- Processing involving tracking or monitoring of individuals (e.g., geolocation, digital monitoring);
- Processing of special category data at scale.

Our DPO is involved in all DPIAs. Where a DPIA identifies a residual high risk that cannot be mitigated, we consult the Autoriteit Persoonsgegevens prior to commencing processing (Article 36 GDPR).

16. Direct Marketing and Fundraising Communications

ADRA Nederland sends newsletters, programme updates, and fundraising appeals by email and post. We do this on the following basis:

- Email marketing to new contacts: only with prior opt-in consent (Article 11.7 Telecommunicatiewet; Article 6(1)(a) GDPR).
- Email marketing to existing donors: under the soft opt-in exemption (Article 11.7(3) Telecommunicatiewet), where you have donated to ADRA Nederland and we are communicating about similar activities, with a clear unsubscribe option in every communication.
- Postal marketing: on the basis of legitimate interest, with a right to object at any time.

Every marketing communication contains a clear and easy opt-out mechanism. Opt-outs are processed within 5 working days. Withdrawal of consent for email marketing does not affect the lawfulness of communications sent before the withdrawal.

17. Legitimate Interests Balancing

Where we rely on legitimate interests (Article 6(1)(f) GDPR) as our legal basis, we have conducted a three-part balancing test:

- **Purpose test:** We identify a genuine and legitimate purpose that is not overridden by other considerations.
- **Necessity test:** We assess whether processing is necessary to achieve that purpose or whether a less intrusive method could achieve the same result.
- **Balancing test:** We weigh our interests against the reasonable expectations and rights of the data subjects, considering the impact of the processing on them.

Documented legitimate interest assessments (LIAs) are maintained in our RoPA for each processing activity where this basis is relied upon. Data subjects have the right to object to processing based on legitimate interests at any time (Article 21 GDPR), and their objection will be honoured unless we can demonstrate compelling legitimate grounds that override their interests, rights, and freedoms.

18. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our processing activities, applicable law, or regulatory guidance. When we make material changes, we will:

- Update the version number and date at the top of this document;
- Publish the updated Policy on our website at www.adra.nl/privacy;
- Notify registered donors and newsletter subscribers by email where the changes are significant.

We encourage you to review this Policy periodically. Continued use of our website or engagement with our services following a material change constitutes acknowledgment of the updated Policy, subject always to your rights under applicable data protection law.