

Privacy Policy Paluka

Paluka., registered as an Lda in Lagoa, Portugal under registration number 518867790, and as a V.O.F. with the Dutch Chamber of Commerce (KvK) under registration number 34139774, is responsible for the processing of personal data as set out in this privacy statement.

You can reach us via privacy@paluka.nl.

Personal data that we process

Paluka processes your personal data because you use our services and/or because you provide this data to us yourself. Below you will find an overview of the personal data that we process, depending on the service purchased:

- First and last name
- Gender
- Date of birth
- Address details
- Phone number
- Email address
- Bank account number
- Other personal data that you actively provide (verbally, in writing or digitally)

Special and/or sensitive personal data that we process

Our website and/or service does not intend to collect data about website visitors under the age of 16, unless they have permission from a parent or guardian. However, we cannot verify whether a visitor is older than 16. We therefore advise parents to be involved in their children's online activities to prevent data from being collected about children without parental consent. If you are convinced that we have collected personal data about a minor without such consent, please contact us at privacy@paluka.nl, and we will delete this information.

PALUKA STUDIO

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3511 AK Utrecht

✉ hello@paluka.studio

PORTUGAL
Sitio Vale d'el Rei s/n Caixa Postal 217-X
8400-421 Lagoa

🌐 paluka.studio



For what purpose and on what basis we process personal data

Paluka processes your personal data for the following purposes:

- Processing your payment (basis: necessary for performance of the agreement).
- To be able to call or email if this is necessary to perform our services (basis: necessary for performance of the agreement).
- To offer you the possibility to create an account on talentscan.nl or IOscan.nl (basis: after unambiguous consent).
- To perform our services, that is to say, to support the development of people and organizations. In doing so, we only use data that you voluntarily share with us. Without your explicit consent, we do not share this data with any other parties involved.
- Paluka also processes personal data when we are legally required to do so, such as data we need for our tax return.

How long we retain personal data

Paluka does not retain your personal data for longer than is strictly necessary to achieve the purposes for which your data is collected. We apply a standard retention period of 10 years to be able to provide our services appropriately in the event of any follow-up. For example, a coaching trajectory that is restarted or a follow-up of an already completed development program.

Sharing personal data with third parties

Paluka shares your personal data with various third parties if this is necessary for the performance of the agreement and to comply with any legal obligation. We enter into a data processing agreement with companies that process your data on our behalf to ensure the same level of security and confidentiality of your data. Paluka remains responsible for these processing activities.

These third parties are:

- Protagonist in Rotterdam for hosting our websites.
- Roos Vrms in Lagoa, Portugal.

View, modify, or delete data

You have the right to access, correct, or delete your personal data. In addition, you have the right to withdraw any consent for data processing or to object to the processing of your personal data by Paluka, and you have the right to data portability. This means that you can submit a request to us to send the personal data we hold about you in a computer file to you or to another organization named by you. You can send a request for access, correction, deletion, or data transfer of your personal data, or a request to withdraw your consent or object to the processing of your personal data to privacy@paluka.nl. To ensure that the request for access was made by you, we ask you to send a copy of your proof of identity along with the request. Please black out your passport photo, MRZ (machine readable zone, the strip of numbers at the bottom of the passport), passport number, and Citizen Service Number (BSN) on this copy. This is to protect your privacy. We will respond to your request as soon as possible, but within four weeks.



Paluka would also like to point out that you have the option to file a complaint with the national supervisory authority, the Dutch Data Protection Authority. You can do so via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

How we protect personal data

Paluka takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized modification. If you believe that your data is not properly secured or if there are indications of misuse, please contact us at privacy@paluka.nl.

Security measures:

- Paluka uses Google's G Suite for storage, email, and data processing. In doing so, we use strong passwords and pay attention to secure settings, minimal storage, and as few parties involved as possible.
- Our websites (paluka.studio, talentscan.nl, 10scan.nl) are secured with up-to-date SSL certificates.
- Laptops, mobile phones, and tablets are secured with strong passwords, firewalls, and anti-malware software.
- Physical files are stored under lock and key.

This privacy statement was drawn up in Zeist in May 2018 and updated in August 2026.