

Privacy Policy – CYRA Tool

Centre for Crime Prevention and Safety (CCV)

Last updated: August 8, 2025

The Centre for Crime Prevention and Safety (hereinafter: CCV) places great importance on the protection of personal data. In this privacy policy, we explain how we handle your personal data when using the CYRA tool, available via cyberrating.nl.

1. Who is responsible for data processing?

CCV
Churchillaan 11
3527 GV Utrecht
the Netherlands

2. What data do we collect?

When you use the CYRA tool, we process the following data (which may include personal data):

- First and last name
- Email address
- Organisation name and details
- Industry information (SBI code)
- Payment details (via Mollie)
- Results of the self-assessment
- Technical data (such as IP address, browser information via Matomo Analytics)

3. What do we use this data for?

We process your data solely for the following purposes:

- Providing access to the CYRA tool
- Executing the self-assessment
- Facilitating an audit request with a certification body (communication for this takes place outside the tool)
- Payment and administration of the subscription
- Improving the tool (through anonymised benchmarking)
- Analysing website usage via Matomo (configured for privacy)
- Meeting legal obligations (e.g. fiscal retention requirements)

4. What are our legal bases for processing your data?

We process your data based on the following grounds:

- Performance of a contract: to provide and operate the tool, including conducting the self-assessment and managing the account.
- Legal obligation: for administrative purposes, such as compliance with tax retention requirements for payment data.
- Legitimate interest: to improve our services, including benchmarking based on self-assessment data. We use this data to analyse trends and insights over time, for example in the context of certification and service quality improvement. In doing so, we carefully balance your interests, privacy, and rights, and apply appropriate safeguards (such as data minimisation and pseudonymisation). You have the right to object to this processing (see section 8).
- Consent: only where legally required, such as for placing non-essential cookies (see section 6).

5. Is your data shared with third parties?

To ensure the proper functioning of the CYRA tool, we work with third parties. We only share your data with them where necessary for their contribution to the tool or where required by law. We only share the data strictly needed for their role. We share data with:

- Mollie (for payment processing)
- Hosting and IT service providers
- Certification bodies (they can access self-assessment results of their own clients within the tool)
- Matomo (for privacy-friendly analytics, self-hosted)

No personal data is transferred outside the European Economic Area (EEA).

6. Cookies

We use functional and analytical cookies. We ask for your explicit consent only for non-essential cookies via a cookie banner. Analytical cookies are implemented using Matomo and are configured to respect your privacy (e.g. anonymised IP addresses, no tracking cookies).

7. How long do we keep your data?

We do not retain your data longer than necessary for the purposes for which it was collected. The following retention periods apply:

- Account and self-assessment data: up to 5 years after account termination. This period is necessary to carry out long-term analyses and benchmarking, for example in the context of certification cycles and service quality improvement. This processing is based on our legitimate interest. You have the right to object (see section 8).
- Payment data: 7 years (in accordance with legal tax retention requirements)
- Technical data (Matomo): up to 12 months

8. Your rights

You have the following rights regarding your personal data:

- The right to access, correct, or delete your personal data or your entire account
- The right to data portability
- The right to withdraw previously given consent for certain types of processing
- The right to object to processing based on legitimate interest (such as benchmarking). In that case, we will reassess whether the data should be deleted or may continue to be processed

To exercise any of these rights, you may contact us at privacy@hetccv.nl. We will respond no later than one month after receiving your request.

9. Security

We take appropriate technical and organisational measures to prevent misuse, loss, or unauthorised access to your data. Access to the tool is restricted, data is stored in encrypted form, and secure connections (SSL) are used.

If you have any questions about this privacy policy, please contact us at privacy@hetccv.nl.