



Privacy Statement Fresh Thoughts and The Happy Expats

Last updated: 14 September 2026

When you work with me, you often share personal information. It's important to me that you know what I do with it and that you can trust me to handle it carefully.

This privacy statement applies to Fresh Thoughts and to the websites www.freshthoughts.nl and www.thehappyexpats.nl. The Happy Expats is not a separate legal entity.

The controller is:

Fresh Thoughts

Simon Jansen

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KvK (Dutch Chamber of Commerce): 84268417

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Fresh Thoughts never sells personal data to third parties.

1. What personal data do I process?

Depending on how you contact me and which services you use, I may process the following data, among other things:

- name, address, and city;
- email address and phone number;
- billing and payment details;
- appointment details;
- information from contact and intake forms;
- information you share yourself during coaching, training, advice, or guidance;
- coaching notes relevant to a program;
- data and results from personality questionnaires, assessments, or driver/motivation scans;
- data needed to take part in e-learning;
- data for newsletters and other communication;
- technical data such as IP address, cookies, and information about website use.

I only process data that is relevant to the purpose for which it is needed.

2. Personal and sensitive information within coaching

During coaching, personal topics may come up. This can include information that qualifies as special category data under the GDPR, for example health information.

The coachee decides for themselves what information to share. For processing this kind of special category data, I ask for your explicit consent at the start of the program, via the coaching agreement and way of working. I handle such information with extra care and confidentiality, and do not keep it longer than necessary (see article 18).

3. What do I use personal data for?

I use personal data, among other things, to:

- stay in contact with you;
- schedule an introductory meeting, intake, or coaching session;
- carry out coaching, team coaching, training, advice, or other guidance;
- organize a program practically and administratively;
- manage appointments;
- process invoices and payments;
- provide access to e-learning;
- carry out scans or assessments;
- send newsletters and other communication you signed up for;
- keep the websites working properly;
- analyze website use and improve the services;
- comply with legal and tax obligations.

4. On what legal basis do I process data?

Personal data is only processed when a valid legal basis exists. This can be:

- performance of a contract, for example for a coaching program;
- steps prior to a contract, for example when you request an introductory meeting;
- a legal obligation, for example for financial administration;
- consent, for example for newsletters, certain cookies, or specific processing;
- legitimate interest, for example for security or properly organizing the services, as long as your privacy interest does not outweigh it.

For special category data you share during coaching (such as health information), the explicit consent you give at the start of the program via the coaching agreement and way of working specifically applies (see article 2).

Where processing is based on consent, you can withdraw that consent at any time.

5. Confidentiality within coaching

What is discussed during coaching is treated as confidential.

I do not share the content of coaching conversations with third parties without the coachee's consent, except where there is a legal obligation or an exceptional situation where serious harm to the coachee or others is at risk.

If an employer or other party is the client or payer, they do not automatically receive content information about the coaching. Where feedback is part of a program, arrangements about this are made in advance.

6. Other coaches and partners

Within The Happy Expats or other programs, coaching or guidance may also be delivered by an affiliated coach or partner.

It is made clear in advance who delivers the service.

If personal data needs to be shared with another coach or partner, this only happens to the extent necessary for the program and within the agreed arrangements.

A coach working independently may be the controller for their own professional services. Where that applies, this is made clear in advance.

7. Which systems and service providers do I use?

For my services I use various external systems and suppliers. At present these include, among others:

- TransIP for hosting freshthoughts.nl;
- WordPress and its plugins for freshthoughts.nl;
- Plug&Pay for thehappyexpats.nl and for order, payment, and invoicing data;
- MailBlue for newsletters and email marketing;
- Calendly for scheduling appointments;
- Microsoft Teams, Google Meet, and Zoom for online conversations;
- Huddle for e-learning;
- Into Drives for driver/motivation scans;
- Microsoft OneDrive and Apple for cloud storage;
- Cookiebot by Usercentrics for cookie management on freshthoughts.nl;
- Cloudflare for security;
- Meta/Facebook for marketing technology where consent has been given;
- AI and transcription tools as described further in this statement.

These parties may process personal data to the extent necessary to deliver their service.

Where a supplier processes data solely on my instructions, appropriate data processing arrangements are made where needed.

8. Transfers outside the European Economic Area

Some suppliers may process data outside the European Economic Area.

When this happens, personal data is only processed where a valid legal basis and appropriate safeguards exist, for example an adequacy decision or approved contractual safeguards.

9. Intake forms and email

Intake forms may be sent and returned by email.

This information is used to prepare and carry out the coaching program and may contain personal information.

Email correspondence is only kept for as long as relevant to the program, administration, or another legitimate purpose.

10. Online appointments and conversations

Calendly may be used for appointments. Online conversations may use:

- Microsoft Teams;
- Google Meet;
- Zoom.

These services may process, for example, name, email address, appointment details, and technical data.

Conversations are not recorded by default.

11. E-learning via Huddle

Huddle is used for participation in e-learning.

To give access to the learning environment, at minimum a first name and email address are processed.

Fresh Thoughts and The Happy Expats do not actively use information about participation and use for purposes other than those for which the e-learning is offered.

12. Driver/motivation scans via Into Drives

When a driver/motivation scan is part of a program, data and results are processed in the Into Drives environment.

The results may be kept by Fresh Thoughts and used substantively within the agreed program, or when the coachee requests this.

A driver/motivation scan is intended as a tool for reflection and development and is not a medical or psychological diagnosis.

13. Use of AI

Fresh Thoughts and The Happy Expats use AI and other digital tools for, among other things:

- text editing;
- marketing;
- developing e-learning;
- reflection material;
- analysis and preparation;
- supporting deeper insight into, for example, driver/motivation scans.

This may involve tools such as ChatGPT, Claude, and other AI tools.

Directly identifiable personal data and confidential coaching information are not entered into external AI systems without an appropriate legal basis and safeguards.

Where possible, data is anonymized or pseudonymized beforehand.

AI supports the coach's work but does not make professional decisions. Interpretation, judgment, and professional responsibility remain with the coach.

14. AI-assisted transcription

Coaching conversations may sometimes use AI-assisted transcription software, for example Granola or a similar application.

This only happens with the coachee's knowledge.

The transcript is used as a temporary aid and then deleted.

Any notes kept from the conversation:

- are limited to what is relevant to the coaching;
- contain as little directly identifiable personal data as possible;
- are anonymized or pseudonymized where possible;
- are stored securely;
- serve only as an aid for the coach.

15. Newsletters and MailBlue

Fresh Thoughts and The Happy Expats use MailBlue for newsletters and email marketing.

When you subscribe, at minimum your name and email address are processed.

You can unsubscribe at any time via the unsubscribe link in the email or by contacting me.

After unsubscribing, your email address is no longer used for newsletters, except where data must still be kept for administrative or legal reasons.

16. Payments and administration

For orders through The Happy Expats, Plug&Pay may process personal data needed for ordering, payment, invoicing, and administration.

Financial and tax data is kept for as long as legally required.

17. Cookies

Both websites use cookies and similar technologies.

freshthoughts.nl

Freshthoughts.nl uses, among others:

- necessary cookies for the website to function;
- WordPress and Elementor cookies;
- a language preference cookie via Polylang;
- Cookiebot by Usercentrics for cookie management;
- Meta/Facebook marketing technology.

Non-necessary marketing and tracking cookies are only used once consent has been given.

thehappyexpats.nl

Thehappyexpats.nl uses, among others:

- functional and technical cookies for Plug&Pay;
- security cookies and Cloudflare technology;
- statistical cookies where consent has been given;
- marketing cookies, including Meta/Facebook technology, where consent has been given.

Visitors can indicate their preferences via the cookie banners.

Where possible, an up-to-date overview of cookies used, their purposes, and retention periods is also available via the website.

18. Retention periods

I do not keep personal data longer than necessary for the purpose for which it was collected.

Coaching notes and other content from a coaching program are deleted no later than 3 months after the program ends. You can also ask me to delete this earlier, insofar as there is no legal obligation to retain certain data.

If you start a new coaching program later, you may therefore need to give me some background information again or help refresh my memory.

In addition:

- financial and tax data is kept for the legally required period;
- newsletter data is kept until you unsubscribe;
- temporary transcripts of coaching conversations are deleted after use;

- contact and intake data that does not lead to a program is not kept longer than reasonably necessary;
- data held by external suppliers may also be subject to that supplier's own retention periods.

19. Security

I take appropriate technical and organizational measures to protect personal data against loss, misuse, unauthorized access, unwanted disclosure, and unauthorized alteration.

This includes access controls, secure cloud environments, up-to-date software, and encryption where available.

20. Your privacy rights

Under the GDPR you have several rights.

Access

You can ask which personal data I process about you and what I use it for.

Correction

You can ask to have incorrect or incomplete data corrected.

Erase

In certain circumstances you can ask to have personal data deleted. This right is not unlimited, for example where I must retain data under a legal obligation.

Restriction

In certain situations you can ask to temporarily restrict processing.

Objection

You can object to certain processing, for example where it is based on a legitimate interest.

Withdrawing consent

Where processing is based on your consent, you can withdraw that consent again.

Data portability

In certain cases you can ask to have personal data transferred digitally to you or to another organization.

You can send a request to: simon@freshthoughts.nl

I will handle the request within the applicable statutory term.

21. Complaints

If you have questions or concerns about how I handle personal data, please contact me directly first.

I'm happy to try to resolve questions or issues directly.

You also always have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

22. Changes

My services, websites, and the systems I use may change. This privacy statement may therefore be updated.

The most current version is published at:

www.freshthoughts.nl

www.thehappyexpats.nl

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