

Privacy Statement WOOSH5

LAST UPDATED: 27 AUGUST 2026

1. Introduction

WOOSH5 respects the privacy of everyone who uses the website, the WOOSH5 platform, coaching, training and other services of WOOSH5.

WOOSH5 offers a digital SaaS platform for coaching, training and personal development. Through the platform, users can, among other things, take part in coaching programmes, training and exercises and provide personal information needed for these services.

This Privacy Statement describes which personal data WOOSH5 processes, why we do so, how we protect this data, with whom we may share data and what rights you have.

WOOSH5 processes personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws and regulations.

2. Who is WOOSH5?

The party responsible for the processing of personal data is:

WOOSH5 BV

Druivenstraat 3, 1st floor, Unit 15

4816 KB Breda

Netherlands

Chamber of Commerce no.: **62071041**

Email: info@woosh5.com

Website: <https://woosh5.com>

WOOSH5 has appointed a Data Protection Officer (DPO). The DPO monitors compliance with privacy legislation within WOOSH5 and is the central point of contact for questions about the processing of personal data. You can reach the DPO at privacy@woosh5.com.

3. Which personal data does WOOSH5 process?

Depending on your use of WOOSH5, we may process various types of personal data.

3.1 Account and contact details

This may include, among other things:

- name;
- email address;
- telephone number, if provided;
- organisation and job title;
- username;
- account and authentication data.

3.2 Technical data

When using the platform, technical data may be processed, such as:

- IP address;
- date and time of login;
- browser and device data;
- use of functionalities within the platform;
- technical log data;
- data on errors and security incidents.

This data is used mainly to keep the platform secure, reliable and functioning properly.

3.3 Coaching and training data

When you take part in coaching or training via WOOSH5, you may provide information yourself that becomes part of your personal programme.

This may relate, for example, to:

- personal goals;
- answers to questions and assessments;

- answers to exercises;
- progress;
- feedback;
- personal experiences;
- information you enter yourself in the platform;
- communication with a coach.

Because coaching and personal development may relate to personal circumstances and mental functioning, answers to assessments, daily check-ins, exercises, free text and communication with a coach may, among other things, contain special categories of personal data, for example data concerning health. Additional legal conditions apply to such data under the GDPR.

WOOSH5 processes such data only where there is an appropriate legal basis and, where required, a valid exception to the prohibition on processing special categories of personal data, and only in so far as this is necessary for the services.

4. For what purposes does WOOSH5 use personal data?

WOOSH5 uses personal data for the following purposes:

- providing coaching and training;
- delivering and managing the WOOSH5 SaaS platform;
- creating and managing user accounts;
- carrying out personal coaching and training programmes;
- supporting users;
- tracking personal progress within a programme;
- improving and developing our services;
- securing the platform;
- preventing and investigating misuse and security incidents;
- performing agreements;
- complying with legal obligations;
- producing aggregated and/or anonymised analyses and reports.

WOOSH5 does not use personal data for purposes that are incompatible with the purposes for which the data was collected.

5. WOOSH5 is an independent controller

WOOSH5 independently determines which personal data is necessary for offering and providing its services and how this data is processed.

WOOSH5 is therefore the **controller** for these processing activities within the meaning of the GDPR.

When an employer makes WOOSH5 available to its employees, this does not mean that WOOSH5 processes the individual personal data of these employees on behalf of the employer.

The individual user provides his or her data directly to WOOSH5 and uses the WOOSH5 service on the basis of the conditions that apply to the relevant service.

6. Relationship with employers

Organisations can engage WOOSH5 to make coaching and training available to their employees.

In that case, the employer is a customer of WOOSH5.

However, this does not mean that the employer gains access to the individual personal data and coaching information that an employee provides directly to WOOSH5.

WOOSH5 treats the individual user as an independent user of its services and processes the personal data in accordance with this Privacy Statement.

7. Confidentiality of individual coaching

The confidentiality of the individual coaching relationship is a fundamental principle of WOOSH5.

WOOSH5 does not provide **any individual coaching information to the employer**.

This means, among other things, that the employer does not gain access to:

- individual coaching conversations;
- personal answers;

- personal goals;
- individual assessments;
- individual exercises;
- personal feedback;
- individual progress information;
- other information that relates directly to a participant's personal coaching.

The employer cannot request such information via the WOOSH5 platform.

8. Reports to employers

WOOSH5 can provide organisations with reports and insights on the use and results of a programme.

Such reports are provided solely at an **aggregated and/or anonymised level**.

Examples of these may include:

- number of participants;
- participation rate;
- use of programme components;
- general progress;
- aggregated results;
- aggregated feedback;
- general trends and developments.

WOOSH5 aims to ensure that such reports cannot be traced back to individual participants.

Where, because of a small group size or the nature of the information, a report might nevertheless be traceable to an individual participant, WOOSH5 will not provide that information to the employer in such a way.

9. No sale of personal data

WOOSH5 does not sell, rent or trade personal data.

Personal data is shared only where this is necessary for delivering the services, for WOOSH5's business operations, where there is a legal basis for it or where WOOSH5 is legally required to do so.

10. External service providers and processors

For the technical and organisational delivery of its services, WOOSH5 may use specialised external service providers and processors.

These may, for example, be providers of:

- cloud and hosting services;
- software and SaaS services;
- databases;
- security;
- email and communication;
- technical monitoring;
- back-up and continuity;
- IT support.

In doing so, WOOSH5 may use, among others, Microsoft (including Microsoft Teams for video coaching), SendGrid for email services and Cloudflare for security and network services. The parties actually engaged may change; WOOSH5 keeps an up-to-date overview of these.

When an external service provider processes personal data on behalf of WOOSH5, WOOSH5 makes appropriate arrangements regarding data protection, confidentiality and security.

These service providers may process personal data only for the agreed purposes and in accordance with the applicable privacy legislation.

11. Transfers outside the EU/EEA

WOOSH5 aims to process personal data within the EU/EEA. When using international service providers, including suppliers with a parent company outside the EU/EEA, transfer to or access from a country outside the EU/EEA may nevertheless occur.

Before any such transfer takes place, WOOSH5 assesses which legal safeguards are required and ensures that the transfer complies with the GDPR.

This may involve the use of an adequacy decision, the European Commission's Standard Contractual Clauses (SCCs) and, where necessary, additional technical and organisational measures.

More information about the applicable safeguards can be requested via info@woosh5.com.

If such a change is relevant to users, WOOSH5 will amend this Privacy Statement accordingly.

12. Security

WOOSH5 takes appropriate technical and organisational measures to protect personal data against:

- unauthorised access;
- loss;
- destruction;
- unauthorised alteration;
- disclosure;
- other forms of unlawful processing.

Depending on the nature of the processing, these measures may include, among other things:

- access security;
- authentication;
- authorisation;
- logging;
- secure communication;

- monitoring;
- back-up and recovery procedures;
- restricting access to personal data.

Access to personal data is limited to persons who necessarily need this access for their work.

13. Retention periods

WOOSH5 does not retain personal data longer than necessary for the purpose for which it was collected, unless a longer retention period is legally required or permitted. For data within personal programmes, a retention period of one year applies in principle, unless a different period is necessary or legally required.

After that period, WOOSH5 may ask the user whether the data may be retained for longer. Without a valid ground for longer retention, the data is deleted or anonymised.

In the case of anonymisation, directly identifying data is deleted or replaced; for example, the name and email address may be replaced by random characters, so that the remaining data can no longer be linked to the user.

A user may, in so far as the GDPR permits, request full deletion earlier. A new assessment can then be completed again if desired.

Different periods may apply to account data, technical log data, security data and data that must be retained on account of legal obligations.

WOOSH5 reviews the applicable retention periods periodically and deletes or anonymises data as soon as retention is no longer necessary.

14. Legal basis for processing

WOOSH5 processes personal data only where there is a legal basis for doing so.

Depending on the situation, this may, for example, be:

- the performance of an agreement;
- compliance with a legal obligation;

- the legitimate interest of WOOSH5;
- the consent of the data subject;
- another legal basis permitted by the GDPR.

Where processing is based on consent, this consent can be withdrawn at any time. Withdrawing consent does not affect the lawfulness of the processing before the withdrawal.

15. Your rights

Under the GDPR you have, depending on the circumstances, the right to:

- obtain access to your personal data;
- have inaccurate data corrected;
- request the deletion of data;
- request restriction of the processing;
- object to certain processing;
- receive your personal data in a structured, commonly used and machine-readable format;
- withdraw consent for a processing activity where the processing is based on consent.

You can address a request to:

info@woosh5.com

WOOSH5 may ask you to confirm your identity before a request is carried out. We do this to prevent personal data from being provided to the wrong person.

16. Complaints

If you have a complaint about the way WOOSH5 handles your personal data, you can first contact us at info@woosh5.com.

We try to handle complaints carefully and as quickly as possible.

You also have the right to lodge a complaint with the competent data protection authority, in the Netherlands the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**.

17. Cookies

The website and the WOOSH5 platform use necessary cookies and similar technologies for technical functioning and security. In addition, YouTube videos may be embedded on the website.

When an embedded YouTube video is played or loaded, data may be provided to YouTube and cookies or similar technologies may be placed. Where legally required, this happens only after you have given consent.

WOOSH5 currently does not use broader analytics cookies. If such analytics are introduced in the future, this Privacy Statement and the cookie policy will be amended beforehand and, where required, consent will be requested.

More information about the cookies used, their retention periods and changing or withdrawing consent is set out in WOOSH5's Cookie Policy as soon as that policy is available.

18. AI and automated processing

Within the platform, algorithms may select daily actions or suggestions based on the information provided by the user. The user is shown the reasoning behind a suggestion and can disregard it without obligation or make a different choice.

This support does not lead to decisions based solely on automated processing that produce legal effects or otherwise significantly affect the user. Personal data is processed only where there is an appropriate legal basis and in so far as this is necessary for the services.

WOOSH5 does not use individual users' personal data to train general AI models without an appropriate legal basis. Before external AI services that process personal data are deployed, WOOSH5 assesses the privacy, security and legal consequences.

19. Children

WOOSH5 focuses on coaching and training for adults and professional users.

The WOOSH5 platform is not specifically aimed at children.

If a minor uses a WOOSH5 service, the applicable legal rules for processing the personal data of minors are observed.

20. Changes to this Privacy Statement

WOOSH5 may amend this Privacy Statement from time to time, for example when:

- our services change;
- new functionalities are added;
- new technologies are used;
- statutory or legal requirements change.

The most recent version is published at <https://woosh5.com>.

The top of this Privacy Statement states when it was last updated.

21. Contact

Do you have questions about this Privacy Statement, your personal data or the way WOOSH5 processes personal data?

Then please contact us:

WOOSH5 BV

Druivenstraat 3, 1st floor, Unit 15

4816 KB Breda

Netherlands

Chamber of Commerce no.: **62071041**

Email: info@woosh5.com

Website: <https://woosh5.com>

LAST UPDATED: 27 AUGUST 2026