Studiewinkel

PRIVACY STATEMENT

2 JUNE 2026

VERSION 1.1

VERSION HISTORY

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1.0	22 June 2023	Initial version	Studiewinkel
1.1	2 June 2026	Added new processors	Studiewinkel

Studiewinkel Privacy Statement

(Last Updated 2 June 2026)

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1. Introduction to the Privacy Statement

1.1. We at Studiewinkel.nl Coöperatie U.A., Reykjavikstraat 1, 3543KH Utrecht, The Netherlands (**Studiewinkel.nl**) believe that transparency is important. Hence we have made this statement (**Privacy Statement**) in a way that is easy to navigate the information relating on how we process your Personal Data, ensure the protection of your right to privacy and how you can exercise your rights as a user or any other individual dealing with Studiewinkel.nl. Please note that this Privacy Statement may be changed at any time and you will be able to find the latest version of the Privacy Statement on this website (**Website**).

1.2. Many individuals work and learn everyday with the learning products available on our website. As a result, certain types of Personal Data is processed. The processing of any kind of personal data imposes responsibility to do so carefully and safely. After all, the right to privacy is a fundamental right of every individual.

1.3. Hence, that is why we at Studiewinkel.nl take the protection of the right to privacy very seriously and continuously monitor and ensure that we process personal data legitimately, confidentially and with care by implementing contractual, technical, organizational and state-of-the art security measures, in accordance with applicable laws. We do this by implementing a privacy and data protection program through:

a. **Layered Governance & Responsibility**: At a management and strategy level, a Privacy Steering Committee is responsible for oversight and determination of the appropriate policy to ensure privacy. In addition, the Privacy Office at Studiewinkel.nl manages the privacy framework and provides assistance and guidance to the organisation. Moreover, all Studiewinkel.nl employees are responsible for ensuring the adherence and implementation of the privacy policy.



b. **Effective Systems**: Through the creation of organizational systems and providing privacy training to all employees at Studiewinkel.nl, we ensure that our privacy policies enforce the principles under applicable data protection laws, including the requirement of privacy by design in our products and services.



c. **Breach Detection & Countermeasures**: In addition to the protection of the privacy of our users, we have devised a dynamic and streamlined breach detection flow which uses state-of-the-art technological measures to detect and counter attempted intrusions.



d. **Audit**: We voluntarily ensure that our privacy framework is reviewed on a regular basis.



2. Who is responsible for the processing of my Personal Data?

2.1. Studiewinkel.nl is the relevant entity responsible for processing your Personal Data, unless specifically otherwise mentioned in this Privacy Statement. Go to our website for more information about Studiewinkel.nl:

Name of Entity	Studiewinkel.nl Coöperatie U.A.
Chamber of Commerce (KvK)	90051858
Postal Address	Studiewinkel.nl Coöperatie U.A. Reykjavikstraat 1 (3543 KH) Utrecht

2.2. Studiewinkel.nl is a cooperative of publishers (for more details about the publishers please contact us) in The Netherlands (**Publishers**), which aims to facilitate the provision of learning material for higher education. We will do this by:

a. assisting in the preparation, acquisition and communication of Learning Material Lists of teaching materials for higher education in The Netherlands;

b. making available via this Website on which students can purchase the learning resources via requisite lists obtained by us from relevant stakeholders;

c. organizing the sale and delivery of learning materials, including customer service and returns; and

d. providing customer support and take measures to improve the aforesaid services;

When you purchase a learning material, both Studiewinkel.nl and the relevant Publisher will be jointly responsible for their relevant part of the data processing. This will be explained in more detail below.

3. What is Personal Data?

Personal Data means any information relating to an identified or identifiable natural person. For example, your name, home address to deliver your learning material. We process the following types of Personal Data:

- *Website Related Information*;
- *Studiewinkel.nl Account Information*
- *E-Commerce Information,*
- *Educational Professional Related Information,*
- *Promotional, Marketing and Event Related Information,*
- *Customer Support Information;* and
- *Feedback Data*

4. Explanation for whom is this Privacy Statement relevant for?

4.1. This Privacy Statement applies for:

a. ***Website Visitor***

When any person visits our Website, Studiewinkel.nl may process personal data about the person (**Website Visitor**). For example, when a Website Visitor – contacts our Customer Support Portal; or visits our Website we may use cookies and similar technologies to provide you access to our products. In this case, Studiewinkel.nl is a data controller and is responsible as a controller.



Privacy Statement Applicable

If you are you in this category, then this Privacy Statement is applicable for you. Please click here if you would like to know more about Studiewinkel.nl's role in this situation.

b. ***Customer***

A person will fall into this category when a ***Website Visitor*** directly on their own completes a purchase of a product from our Website (**Customer**). In this case, Studiewinkel.nl is a Joint Controller along with the relevant Publisher whose product our Customer purchases.



Privacy Statement Applicable

If you are in this category, then this Privacy Statement is applicable to you. Please click here if you would like to know more about Studiewinkel.nl's role in this situation.

c. ***Educational Professional***

A person will fall into this category when a ***Website Visitor*** representing a school or an educational institution creates an account on our Website (**Educational Professional**). In this case, Studiewinkel.nl is a Joint Controller along with the relevant Publisher whose product the Educational Professional will include in the Learning Resources List and/or whose product the Educational Professional purchases.



Privacy Statement Applicable

If you are in this category, then this Privacy Statement is applicable to you. Please click here if you would like to know more about Studiewinkel.nl's role in this situation.

5. What is the role of Studiewinkel.nl and the Publisher?

5.1. **Studiewinkel.nl as a data controller:**

<u>Website Visitor</u>

a. If you are a ***Website Visitor*** then this section is relevant for you. For specific processing operations, Studiewinkel.nl determines the purpose and means of the processing of Personal Data.

b. In such a situation, Studiewinkel.nl acts as a data controller and is responsible on how your Personal Data is handled. This applies, for example, when you:

- visit our Website;
- create an account on our Website;
- purchase books either by creating an account or not;
- provide your consent for cookie preferences;
- provide your consent for marketing activities; or
- contact our Customer Support Portal.



Learning Materials List

c. If you are an ***Educational Professional*** then this section is relevant for you. Learning Materials Lists (**LML**) are the lists which you as an ***Educational Professional*** can make containing a compilation of book lists and/or learning materials. Studiewinkel.nl offers an section for Educational Professionals to make an LML. After completion of an LML it will be made available on the Website and can be used by Customers to purchase learning materials.

d. You as the ***Educational Professional*** can use the LML section on the Website after creating an account using the unique invitation link shared with you by Studiewinkel.nl.

e. Studiewinkel.nl is solely responsible for determining the purpose and means of processing of Personal Data for facilitating the creation of LML on the Website. This applies when you create and use an account for sharing the LML.



5.2. **Studiewinkel.nl as a Joint Controller with a Publisher:**

a. If you are our ***Customer*** then this section is relevant for you. For specific processing operations, Studiewinkel.nl along with the relevant Publisher whose learning material you purchase, will determine the purpose and means of processing of Personal Data.

b. In such a situation, Studiewinkel.nl along with the relevant Publisher will jointly responsible for how your Personal Data is handled to the extent of their data processing. This applies when you complete a purchase of a learning material on our Website.



c. Studiewinkel.nl and relevant Publishers are joint controllers for the data processing in connection with the sale of those Publishers' learning materials through the Website that is required for the performance of contractual responsibilities and other obligations as required under applicable law. Therefore, Studiewinkel.nl and/or the relevant Publishers are liable for the extent of their data processing in this regard to the extent required under applicable law.

6. Can minors / children use the Website?

6.1. Studiewinkel.nl does not offer products for sale directly to children (i.e. who are less than 16 years old). We do offer the products for sale to adults or minors may use the Website only with the permission of a parent or guardian.

7. What data do we process from you, what do we use it for and how long are they kept?

7.1. When we use the term Personal Data in our privacy statement, we mean information that relates to you and that allows us to identify you directly or indirectly in combination with other data we process. These include:

a. **Website Related Information**

When a ***Website Visitor***, visits our Website, Studiewinkel.nl acts as a data controller as we may process your Personal Data with the help of cookies, trackers and IP addresses for providing access and functionality to our Website, for completing any further orders. Cookies are small text files which are stored on your internet browser to store information on how you use our Website. We may process certain necessary cookie data or Personal Data for legitimate interests. For example, to prevent denial of service attacks, or to ensure load balancing or direct marketing. In addition, we may process cookie data or Personal Data which are optional on the basis of your consent, as applicable. For more information about the management of cookies, please click here.

b. **Studiewinkel.nl Account Information**

When a ***Website Visitor*** creates an account on our platform for buying learning material, Studiewinkel.nl acts as a data controller and may process the following information to create and maintain your account:

- Full name
- E-mail address
- Telephone number
- IP address
- Direct marketing related consents
- Consents for setting personal preferences on the Website
- Login credentials for accessing your account
- Internet browser type
- Cookie data
- Lists of learning materials relevant for you
- Past purchases by you
- Relevant invoices for purchases made
- Date of birth
- Conversations with customer Support agents
- Delivery address
- Billing address
- Billing history
- Payment information
- User account information
- Confirmation that you are an adult
- Learning Resources Lists (i.e. the list of learning material prescribed for academic use)
- *Website Related Information*

When a ***Website Visitor*** does not create an account on our platform for buying learning material and **orders as a guest**, Studiewinkel.nl acts as a data controller and may process the following information to process the orders:

- Full name
- E-mail address
- Telephone number
- IP address
- Direct marketing related consents
- Relevant invoices for purchases made
- Date of birth
- Conversations with customer Support agents
- Delivery address
- Billing address
- Billing history
- Payment information
- User account information
- Confirmation that you are an adult
- *Website Related Information*

When a ***Website Visitor*** who is an ***Educational Professional*** creates an account on Website for managing the **LML Account**, Studiewinkel.nl acts as a data controller and may process the following information to create and maintain your account:

- Full name
- E-mail address

- Telephone number
- IP address
- Direct marketing related consents
- Consents for setting personal preferences on the Website
- Login credentials for accessing your account
- Internet browser type
- Cookie data
- Lists of learning materials relevant for you
- Role of the *Educational Professional*
- Learning Resources Lists (i.e. the list of learning material prescribed for academic use)
- Conversations with customer Support agents
- User account information
- Confirmation that you are an adult

We will use this Studiewinkel account Information on the basis of legitimate interest to assist you to manage your purchases and/or provide you functionality on our Website. We will keep this information until you delete your personal account on our Website. We may need to retain certain Personal Data for longer durations to meet our legal obligations as required by applicable laws. For example, for tax purposes or for reporting requirements.

Studiewinkel.nl may transfer this information relating to the LML Account with it's successors or assignees at a later date who may continue processing this information with the basis of legitimate interests to provide you the ability to mange your LML Account. We will notify you about this transfer and you can decide to opt-out by contacting via the contact details provided below or by the electronic means indicated before the transfer.

c. **E-Commerce Information**

When our ***Customer*** purchases products or is in the process of completing a purchase on our Website, Studiewinkel.nl and the relevant Publisher whose learning material you purchase, will jointly process the *Studiewinkel.nl Account Information* for the performance of the contract i.e. to complete the sale, to provide delivery of learning materials to you or to offer you recommendations for similar learning materials to you on the basis of legitimate interest. In this regard, both Studiewinkel.nl and the relevant Publisher will act as joint data controllers.

When we are processing such relevant information, this processing is based on the performance of the contract to which you are a party.

We may process this Personal Data for any other compatible purposes as mentioned in this privacy policy. We will keep the relevant information in accordance with the durations as mentioned in this privacy statement or for the duration as required under applicable laws.

d. **Educational Professional Related Information**

When an ***Educational Professional*** creates an account on the Website as a representative of a school or educational institution, then Studiewinkel.nl will process the *Studiewinkel.nl Account Information* on the basis of performance of contract to make the LML account functionality on the Website accessible to you and to offer you

recommendations for similar learning materials from time to time and on the basis of legitimate interest to improve the services provided by Studiewinkel. We may process this Personal Data for any other compatible purposes as mentioned in this privacy policy. We will keep the relevant information in accordance with the durations as mentioned in this privacy statement or for the duration as required under applicable laws.

e. **Promotional, Marketing and Event Related Information**

If our ***Customer***, has purchased products and/or services available on the Website we will process the relevant Personal Data: *Website Related Information, Studiewinkel.nl Account Information, E-Commerce Information* on the basis of legitimate interest. By processing such data, we can provide you with relevant information about similar products and services. We do this based on your past purchases from Studiewinkel.nl for the best personalized experience, browsing behavior, keep you updated about our new and improved products. We or our Publishers may also process this data to reach out to you about in-person events which may be relevant to the educational material you have purchased from the Website.

If an ***Educational Professional*** has created an account to manage the LML on our Website, we may process the relevant Personal Data: *Website Related Information, Studiewinkel.nl Account Information,* for promotional, marketing and event related purposes on the basis of your consent if you have provided that to us. By processing such data, we can provide you with relevant information about similar educational material you have included in the LML lists on your account. We may also process this data to reach out to you about in-person events which may be relevant to the educational material you have mentioned on the LML lists in your account.

Studiewinkel.nl always offers you the option to stop receiving promotional, marketing, event related or tailormade communication from us which we send either on the basis of your consent or legitimate interest. We will comply with relevant applicable laws when processing your Personal Data concerning Promotional, Marketing and Event Related Information.

A ***Website Visitor*** or our ***Customer*** and/or ***Educational Professional*** also has the possibility to receive our promotional, marketing or event related information at any time on our Website or on any other place either online or offline, as applicable. When you choose to subscribe to such information, we process the relevant Personal Data: *Website Related Information, Studiewinkel.nl Account Information, E-Commerce Information* on the basis of consent. We may at times process your personal data we receive from other sources including our partners and Publishers, for providing information about relevant products and services. Studiewinkel.nl may transfer this Promotional, Marketing and Event Related Information with it's successors or assignees at a later date who may continue processing this information with your consent to provide you the ability to receive relevant information about similar products and services. We will notify you about this transfer and you can decide to opt-in by the electronic means indicated before the transfer.

You can reach out to our Customer Support at any time to exercise your data subject rights provided in this statement below or by clicking on the '*unsubscribe*' of the e-mail we send you.

f. **Customer Support Information**

You can reach out to our Customer Support *via* the contact details provided on our Website or by clicking here. In order to provide the support and answer your questions for

our products and services, we process your relevant Personal Data as required to address your query, which can include your:

- *Website Related Information,*
- *Studiewinkel.nl Account Information,*
- *E-Commerce Information,*
- *Educational Professional Related Information,*
- *Promotional, Marketing and Event Related Information,*
- Feedback or responses provided during our customer support.

When we provide this service to you under a contract (i.e. when you have purchased from our Website), we are processing of your Personal Data for the performance of the contract to which you are a party or on the basis of legitimate interest to provide you with functionality of our Website or products. We will store the data in accordance with the durations as mentioned in this privacy statement or for the duration as required under applicable laws.

g. **Feedback Data**

We at Studiewinkel.nl, believe that given the nature of our educational products, we need to constantly provide you an improved product and service experience. In this regard, we process your Personal Data you have shared during the use of our products and services, which includes your *Customer Support Information*, comments, reviews, evaluations of our products and services. We will process this on the basis our legitimate interest to meet compliance standards, provide information to train our customer support team and most importantly provide you with improved quality of products and services on a regular basis.

We may share this **Feedback Data** with our Publishers on a legitimate interest basis for:

- the purpose of facilitating the preparation of Learning Resource Lists,
- facilitating orders through the Website,
- allowing our Publishers to improve and update their products and services.

Studiewinkel.nl may also share aggregated data derived from the Customer Support Information with the Publishers on the basis of legitimate interest.

We may retain this **Feedback Data** in accordance with appliable laws for as long as your account is active, and/or you withdraw your consent or for a longer duration in an aggregated manner (i.e. you will not be identifiable anymore).

7.2. We do not process any sensitive Personal Data which includes any information which can reveal your racial or ethnic origin, political opinions, genetic data, biometric data.

8. From whom do we process Personal Data and how do we obtain this data?

8.1. We may process your Personal Data when we either receive it directly from you or indirectly from other sources. When we process your Personal Data after receiving indirectly, we will let you know in accordance with applicable laws.

9. Who is your data shared with?

9.1. In order to process your order, we work together with Publishers (who are joint controllers as mentioned above), distribution partners such as Centraal Boekhuis and logistics partners such as Punt Uit (who are our processors). Click here for more information about our processors. We have signed separate data processing agreements with our processors in accordance with applicable laws. These parties may receive your Personal Data as described here to ensure that they can process your order correctly. You are requested to consult their privacy statements for more information on how they process your Personal Data.

10. Where do we store your data?

10.1. We store your data primarily in The Netherlands and in the larger the European Economic Area (**EEA**). However, certain Personal Data that we collect may be transferred to or stored at a destination outside the EEA, if one of our third-party service providers is based there. In this is the case, we ensure that this is done in a safe and lawful manner by taking appropriate safeguards in accordance with appliable laws.

11. How is your data secured?

11.1. We along with our partner Publishers and Processors, takes contractual, organizational and technical measures to protect your Personal Data. Through strict access control, we ensure that your Personal Data is only accessible to employees for whom it is necessary that they work with it. If you would like to know more about this, please reach out to us using the details provided below.

12. What are your data protection rights?

12.1. As per applicable data protection laws, you have rights including:

a. **Your right of access** - You have the right to ask us for copies of your personal information.

b. **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

c. **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. We cannot grant this request if there are pending orders or invoices. We also cannot grant this request if we are allowed under applicable laws to keep your Personal Data despite a request.

d. **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

e. **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

f. **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

12.2. You are not required to pay any charge for exercising your rights. If you make a request, we normally have 30 days to respond to you. Please contact us via the contact details provided in paragraph below if you wish to make a request.

13. Privacy & Data Protection Contact Details

13.1. For all queries on how we handle your Personal Data, you can contact us via the contact information below or the relevant Publisher(s) in the manner as mentioned in their privacy statements referred in Appendix 1:

Name	C/o Privacy Officer Studiewinkel.nl Coöperatie U.A.
Postal Address	Reykjavikstraat 1 (3543 KH) Utrecht
E-mail	privacy@studiewinkel.nl

13.2. If you are unhappy with the response we have provided on how we have used your Personal Data, you can file a complaint with the Autoriteit Persoonsgegevens

Name	Autoriteit Persoonsgegevens
Postal Address	Postbus 93374 2509 AJ Den Haag
Helpline Number	070-8888 500
	You can also contact the AP here.
Website	https://autoriteitpersoonsgegevens.nl/nl

Appendix 1
(List of Publishers)

For a full list of publishers, please go to our website: https://studiewinkel.nl/about-us.

Appendix 2
(List of Processors)

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
e-Active B.V.	Zwolle, The Netherlands	Maintenance and management of the shopbase fulfillment application including up-to-date security of production and test environment and web-servers	• Company name • First name • Initial(s) • Last name • Address (street, postal code, city) • E-mail address • Telephone number • Delivery receipts & Invoices • IP address (e.g. due to logging)	EU
Centraal Boekhuis B.V.	Culemborg, The Netherlands	Delivery fulfilment of learning material purchased on the Website	• Company name • First name • Initial(s) • Last name	EU

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
			• Address (street, postal code, city) • E-mail address • Telephone number	
Dotts B.V. (Trade Name: Punt Uit)	Emmen, The Netherlands	Logistics handling in case of returns of purchases made on the Website Logistics handling in regard to the LML lists on the Website	• Company name • First name • Initial(s) • Last name • Address (street, postal code, city) • E-mail address • Telephone number • Delivery receipts & Invoices • IBAN (in case of order returns/credits)	EU

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
Cyso Hosting B.V.	Alkmaar, The Netherlands	Hosting and cloud services	• Company name • First name • Initial(s) • Last name • Address (street, postal code, city) • E-mail address • Telephone number • Delivery receipts & Invoices • IP address (e.g. due to logging)	EU
Freshbits B.V.	Amsterdam, The Netherlands	Provision of maintenance and support on the websites and applications	• Company name • First name • Initial(s) • Last name • Address (street, postal code, city) • E-mail address	EU

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
			• Telephone number • Delivery receipts & Invoices • IBAN (in case of order returns/credits) • IP address (e.g. due to logging)	
Flowmailer B.V.	Rotterdam, The Netherlands	Flowmailer is a SaaS solution for the delivery of transactional emails	• Company name • First name • Initial(s) • Last name • Address (street, postal code, city) • E-mail address • Telephone number • Delivery receipts & Invoices	EU
Status 418 B.V.	Emmen, The Netherlands	Lists of learning materials (LML), offering and selling 2nd hand books (marketplace)	LML • First name • Last name	EU

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
			• Role • Educational institution • Email address 2nd hand books • First name • Last name • Address (street, house number postal code, city) • Email address • Phone number • Order details • Billing information • Function (business relationship)	
Administratiekantoor Pors	Ter Apel, Netherlands	Administrative services	• First name • Last name • Address (street, house number postal code, city) • Email address • Phone number • Order details • Billing information • Function (business relationship) • Payment details (business relationship)	EU

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
Buckaroo B.V.	Utrecht, Netherlands	Payments webshop	• First name • Last name • Address (street, house number postal code, city) when choosing to pay afterwards via Riverty • Date of birth when choosing to pay afterwards via Riverty • Email address • Phone number when choosing to pay afterwards via Riverty • Order details • Bank details (IBAN)	EU
Van Ditmar	Amsterdam, Netherlands	Order processing deliveries	• First name • Last name • Address (street, house number postal code, city) • Email address • Phone number • Order details	EU
Gardners EU	Arques, France	Delivery of learning materials purchased on the Website	• First name • Last name • Address (street, house number postal code, city) • Email address • Phone number	

Name of the Sub-Processor	Headquarters of the Processor	Purpose of Processing	Type of Data Processed	Location where the Personal Data is Stored & Processed
			• Order details	
Vitalsource	Raleigh, USA	Delivery of e-books purchased on the Website	• First name • Last name	Outside EU