Privacy Statement

Association year 2022-2023





1. Introduction

This document is the privacy statement of Study Association Flow, located at Warandelaan 2 (Tilburg University Campus), Esplanade building, room 2.04, 5037AB, Tilburg.

If something is not clear in this document, do not hesitate to send an e-mail to <u>internalaffairs@svflow.nl</u> or drop by the Flow office (Tilburg University Campus, Esplanade building, room 2.04).

1.1 About Flow

Study Association Flow is the association for students of Tilburg University who study Communication & Information Sciences (CIS), Cognitive Science & Artificial Intelligence (CSAI), or Data Science & Society (DSS).

The aim of Flow is to support all CIS, CSAI and DSS students on an educational, professional, and social level. More about the goal of Flow can be found in the policy plan, which is published on the website.

1.2 About this document

With this privacy statement we want to inform you, the reader, as well as possible about the personal data we collect from you. It is important to us that you are well informed on what information we collect from you, firstly because we are legally obliged to do so according to the General Data Protection Regulation. Secondly, we want to be transparent towards our members as an association.

In many places in this document, short terms are used to explain why we collect certain data from you. You will find a list of these terms following the table of contents.



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2. Terms

The same terms are often used in the privacy statement. In the explanation of why your data is stored, only the terms listed below are used each time, unless the reason for storage differs.

2.1 Reasons

There are several reasons why we might request and store your data:

- **Correspondence**: in case of correspondence, we need your details in order to contact you.
- **Payment**: in case of payment, we need your details in order to complete a payment. This can be in the form of a direct debit as well as an online transfer.
- Age verification: in case of age verification, we need your details in order to check how old you are. This is for example necessary for activities Flow organises where alcohol is served.
- **Identity**: in case of identity, we need your details to confirm that you are "you." This may be necessary in order to be able to process registrations (e.g. for activities) in the administration, or to prevent registration errors.
- **Insight**: in case of insight, we will use your data to gain a better insight into the association and its members.
- **Other**: sometimes the reason for requesting a particular item of information cannot be classified in one of the above categories. In that case it is always specified why we need this specific data.

2.2 Storage

There are several places where your data is stored at Flow. Below you can read in which ways we may store your data, and the reason for this:

- Davilex: this is the membership administration software that Flow uses. In this program, you will be entered as soon as a flow of money from you is known to Flow. This is the case if you are a member of Flow, or if you visit one of our paid activities as a non-member.
- **Flow-PC**: the Davilex software is only used on the computers in the Flow Office, also called the Flow-PCs. Personal data files are also stored on these computers.
- Wordpress: If you submit a registration form on our website, the data you enter will be stored in a database in Wordpress (the software on which our website runs). In this database we can see the date and time when the form was filled in and all other fields that were entered.
- WooCommerce: Our web shop has been developed using WooCommerce software, we host our web shop on our website via WordPress. The data for your account in the Flow-web shop is, therefore, stored in WordPress and not with WooCommerce. You can change your data in the web shop.
- **Gmail**: All members of the General Board receive their e-mail through Gmail, the mail application of Google. The mail addresses belonging to their function are linked to an account they have personally created. All e-mails containing personal data are marked with a specific term in the subject field.



After one association year, all e-mails containing personal data will be removed from these mail accounts, so that the members of the General Board no longer have access to the e-mail with personal details.

- **Dropbox**: all committees of Flow and the Daily Board of Flow use a secure Dropbox. In the Dropboxes of committees, registration lists are kept for most activities. For activities where you have a payment obligation, a registration list is always kept.
- **One.com**: all e-mails from Flow are sent via One.com's mail servers. It is only possible for the Internal Affairs to view the mail servers.
- Mailchimp: Flow uses Mailchimp to send newsletters and e-mails to large numbers of people. All accounts are hidden in the system. MailChimp will not use your name and email address for their own purposes. At the bottom of each automated email sent from our website you will find an 'unsubscribe" link. When you click on this link you will no longer receive automated emails from our website, note that this can affect the functionality of our website greatly. Your personal data will be securely stored by MailChimp. MailChimp uses cookies and other internet technologies that track if emails are opened and read. Mailchimp retains the right to use your personal information to further improve their services and, within this context, share it with third parties.
- Grouplink: Flow uses Grouplink for the Flow App. Only your email address will be stored here, unless you add more information about yourself. All accounts are hidden, unless you choose to make your account public to the other users.
- **Google Analytics**: if you visit the Flow website, anonymous data about your visit will be collected. This data is stored on Google's servers.
- **Physically in the Flow Office**: in a number of cases, your data will also be stored on paper in the Flow Office. These data are stored in our filing cabinet, which is locked and only accessible for the Daily Board.

2.3 Storage period

At the different storage locations, your data will be stored (depending on the situation) for different reasons for a certain period of time. Below is an indication of how long your data will be stored for each storage medium. Useful to know: an association year is the same as an academic year at Tilburg University. This is always from September 1 to August 31 the following year.

- Davilex: your data will be stored in Davilex until one year after the last association year
 that you were a member of Flow, or until one year after the last association year that
 you were a member of Flow, or if you still have to pay something to Flow.
- Flow-PC: your data will be stored on the Flow-PCs until two years after your last year
 of association. This is necessary, because the Cash Control Committee still needs to be
 able to see these data when doing a check.
- WordPress: your data will be stored in Wordpress until two years after the registration
 of an activity. This is necessary because the Cash Control Committee needs to be able
 to see this data when doing a check.



- Your data will be stored in Wordpress until one year after the last year you were a member of Flow. This is necessary, because it serves as a backup of the registration lists on the Flow-PCs.
- **Gmail**: your data will be stored in Gmail for up to two years after registering for an activity. This is necessary because:
 - The Cash Control Commission needs to be able to see this Data when doing a check.
 - The Commissioner or Board Buddy must still be able to see who has been to an activity and/or has entered into a payment obligation.

- Dropbox:

- In the Dropbox of a committee, your personal data will be stored until the end of the association year. This is necessary, because the Commissioner or Board Buddy must still be able to see who has been to an activity and/or has entered into a payment obligation.
- In the Dropbox of the Daily Board, your personal data will be stored until three years after the association year in which they were stored. This is necessary, because in this way the Daily Board can still observe the actions of three boards before them.
- One.com: your personal data is stored on One.com for up to three years after the year
 in which the data was stored. This is necessary, because in this way the Daily Board can
 still observe the actions of three boards before them.
- Mailchimp: your e-mail will be stored in Mailchimp until you unsubscribe from Flow's newsletter.
- **Grouplink**: your details will remain in Grouplink as long as you are registered as a member, donor or member of the Club of 50.
- Google Analytics: your anonymous data will be stored in Google Analytics for up to 14 months after you have visited Flow's website. This is necessary because we use Google Analytics to view the statistics of the website and 14 months is the shortest storage period of Google Analytics for the data we consult.

3. Security

All data that Flow saves from you is always stored behind one or more passwords and/or a physical lock. The passwords are changed every year by the Internal Affairs. The Internal Affairs has access to all passwords. Board members can request access to passwords at the Internal Affairs.

4. Visitor website

4.1 Data

As a visitor to the website, data is collected from you. We use Google Analytics to get insights in how our website is used. The data we see is anonymous and cannot be linked back to specific persons.

During the monthly General Board Meetings it might occur that a number of general and anonymous statistics of the website are shared, so that the entire General Board gets an idea how much the website is visited.



4.2 Storage

The anonymous statistics of Google Analytics that we use are stored on the servers of Google. Google may be obliged to provide access to this on the basis of applicable laws and regulations facts. We have not allowed Google to use the analytics information obtained for other Google services.

5. General membership

5.1 Data

To become a member of Flow you need to register via a digital form on the website or via a paper registration form that is provided by the Daily Board. In this registration form you are asked for the following data:

- **Gender**: correspondence (this way we can address you correctly), identity.
- **Surname**: correspondence, identity.
- First name: correspondence.
- **Initials**: correspondence, identity.
- Place of residence: identity.
- Nationality: correspondence, identity.
- **Preferred language**: correspondence (this way we can address you in the right language).
- E-mail: correspondence.
- **Telephone number**: correspondence.
- **Date of birth**: age verification, identity.
- Starting year of study: insight.
- Study form: correspondence, insight.
- **Interested in active membership**: insight.
- Surname account holder: payment.
- **Initials account holder**: payment.
- **IBAN**: payment.
- BIC: payment.

5.2 Storage

If you are a member of Flow your data will be stored in Davilex, WordPress (if you subscribe via the website), Gmail (if you subscribe via the website), One.com (if you subscribe via the website), Mailchimp (e-mail only for the newsletter) and physically in the Flow office (if you have subscribed via a paper registration form). Furthermore, your e-mail is added to the Grouplink, in order to enable you to download and activate the Flow-app.

6. Active Membership

If you want to become an active member of Flow you register via the website. There you will need to fill in a form in order to register for one or more committees.

6.1 Data

If you become active, you have to fill in a registration form on the website. In this registration form we ask for the following data:



- **First name:** correspondence, identity.
- **Surname:** correspondence, identity.
- **E-mail:** correspondence.
- **Telephone number:** correspondence.
- **Member:** insight.
- **Committees:** other, in order to inform the correct commissioner that you want to be in their committee.
- Motivation: other, in order to inform the commissioner why you are interested in their committee.

6.2 Storage

If you want to become an active member of Flow, your Data will be stored in Davilex, WordPress, Gmail and One.com.

7. Donator

7.1 Data

As donator of Study Association Flow, you need to fill in a registration form on the website. In this form the following data is requested:

- **Gender:** correspondence (this way we can address you correctly), identity.
- **Surname:** correspondence, identity.
- **First name:** correspondence.
- **Initials:** correspondence, identity.
- **Place of residence:** identity.
- **Preferred language:** correspondence (this way we can address you in the right language).
- E-mail: correspondence.
- **Telephone number:** correspondence.
- **Date of birth:** age verification, identity.
- Surname account holder: payment.
- Initials account holder: payment.
- **IBAN:** payment.
- **BIC:** payment.

7.2 Storage

If you are a donator of Flow your data will be stored in Davilex, WordPress (if you subscribe via the website), Gmail (if you subscribe via the website), One.com (if you subscribe via the website), Mailchimp (only email for the newsletter) and physically in the Flow office (if you have subscribed via a paper subscription form).

8. Alumni

8.1 Data

If you register as an alumnus via de website of Flow you will be asked for the following data:

- **First name:** correspondence.
- **Insertion:** correspondence.



- **Surname:** correspondence.

- **E-mail:** correspondence.

- Track in which you graduated: insight.

Graduation year: insight.Current employer: insight.

8.2 Storage

If you register as an alumnus of Flow your data will be stored in Davilex, WordPress, Gmail, One.com, Dropbox and Mailchimp (only email address for the newsletter).

9. Deregister

9.1 Data

You can deregister from Study Association Flow via the website. In the form you will be asked for the following data:

- **First name:** correspondence, identity.

- **Surname:** correspondence, identity.

- **E-mail:** correspondence, identity.

- Comments: insight.

- **Graduation / company:** insight.

- **Alumni file:** insight / correspondence.

9.2 Storage

When you deregister from Flow your data will be removed from Davilex, WordPress and Mailchimp. The e-mail contact you have had with the association will be stored in One.com and up to one year in Gmail. It is possible that your registration is still stored in an old back-up of Davilex.

10. Internship search

10.1 Data

If you register as an internship seeker via de website of Flow you will be asked for the following data:

- **First name:** correspondence.

- **Surname:** correspondence.

- **E-mail:** correspondence.

- Academic year: insight.

Study area: insight.

- **GDPR:** permission to share your data with companies in order to send you relevant internships.

10.2 Storage

If you register as an internship seeker at Flow your data will be stored in Wordpress, Gmail, One.com and Dropbox.



11. Become a partner

11.1 Data

If you register as a partner via de website of Flow you will be asked for the following data:

- Company name: correspondence.
- **First name:** correspondence.
- **Surname:** correspondence.
- **E-mail:** correspondence.
- Subject: insight.
- Your message: insight.

11.2 Storage

If you get in touch as a company via Flow your data will be stored in Wordpress, Gmail and One.com.

12. Changing data

If you want to change your data at Flow you can do this by filling in the form at https://www.svflow.nl/en/lidmaatschap/gegevens-wijzigen/. It is not possible to change your data in the web shop, your changes will not be implemented.

12.1 Data

The first four fields on the page are needed to be able to send an e-mail to you and to check who we need to adjust data from.

- **First name:** correspondence, identity.
- **Surname:** correspondence, identity.
- **E-mail:** correspondence, identity.
- **Member category:** identity.

We use all data below to update your data. You only have to fill in the fields you want to change.

- **Gender**: correspondence (this way we can address you correctly), identity.
- **Surname**: correspondence, identity.
- **First name**: correspondence.
- **Initials**: correspondence, identity.
- Place of residence: identity.
- Nationality: correspondence, identity.
- **Preferred language**: correspondence (this way we can address you in the right language).
- **E-mail**: correspondence.
- **Telephone number**: correspondence.
- **Date of birth**: age verification, identity.
- Surname account holder: payment.
- Initials account holder: payment.
- **IBAN**: payment.
- **BIC**: payment.



12.2 Storage

If you are a member of Flow, your data will be stored in Davilex, WordPress (if you subscribe via the website), Gmail (if you subscribe via the website), One.com (if you subscribe via the website), Mailchimp (e-mail only for the newsletter) and physically in the Flow office (if you have subscribed via a paper registration form).

13. Activities

There are many different types of activities in which you can participate at Flow. For most activities you have to register through the website. Other special cases will be explained in coming chapters.

13.1 Data

The data you have to give for a registration can differ a lot. However, there are always three forms of data you have to specify. These data must always be filled in, even if you are already a member of the association.

- **First name**: correspondence, identity.
- **Surname**: correspondence, identity.
- E-mail: correspondence.

Other data that you often need to enter are.

- **Member**: insight.
- Date of birth: age verification.
- **IBAN**: payment (you do not need to enter this when your IBAN is already known by Flow).
- **BIC**: payment (you do not need to enter this when your BIC is already known by Flow). All other data that you need to enter are needed to organize an activity properly or for insight.

13.2 Storage

If you register for an activity through the website of Flow, your data will be stored in Davilex (if there is a flow of money connected to your registration, Wordpress, Gmail, One.com, and Dropbox.

14. Study Trip

14.1 Data

If you register for the Study trip via de website of Flow you will be asked for the following data:

- Calling name: identity.
- Name (as mentioned in your passport): identity.
- E-mail: correspondence.
- Gender: identity.
- Date of birth: identity.
- **Place of birth:** identity.
- Nationality: identity, payment.
- Address: identity.
- Telephone number: correspondence.
- Member: insight.
- **Study program:** identity.



- ANR/UNR: identity.

- Year of study/study phase: identity.

- **SSN:** identity.

- **ICE:** correspondence (in case of emergency).

- **Document Number:** identity.

Copy of passport/ID-card: identity.

- Additional information (allergies, etc.): insight.

14.2 Storage

If you register for the Study Trip, all your data will be stored on paper and digitally in a secure Dropbox. These data will be stored from registration until four weeks after the Study Trip, if the member of the trip has fulfilled their payment obligations. Only members of the Study Trip committee can access this Dropbox. The files with personal data will be demitted after the Study Trip.

Some personal data will be in the manuals of the Committee Members during the trip (Name, ICE, Telephone number, etc.). This part of the manual will be destroyed after the Study Trip.

15. Ski Trip

15.1 Data

If you register for the Ski Trip via de website of Flow you will be asked for the following data:

Name: identity.

- Date of birth: identity.

- **Address:** identity.

- **E-mail:** correspondence.

- **Telephone number:** correspondence.

- **ICE:** correspondence (in geval van nood).

- Ski skill: insight.

- **Skiing/Snowboarding:** insight.

Use of extra services (equipment rental): insight, payment.

Additional information (allergies, etc.): insight.

15.2 Storage

For Ski Trip you register on the website. Your data will be sent to the commissioner and stored in the secure Dropbox of the committee. The data will be stored until four weeks after the Ski Trip, if the member of the trip has fulfilled their payment obligations. All traces of personal data will be deleted from the website, Gmail, and One.com. If the Ski Trip Committee chooses to make use of an external party to organize the Ski Trip, they will only share the necessary personal details for the delivery of services to this party. In the context of the transfer of personal data, Flow is not responsible and cannot be held liable for the further processing of your personal data by this external party.

16. Tutoring

Flow offers the opportunity to give and receive tutoring through the association.



16.1 Giving tutoring

16.1.1. Data

If you register for tutoring (giving party) via de website of Flow you will be asked for the following data:

Name: identity.

- **E-mail:** correspondence.

Course: insight.Remarks: insight.Member: insight.

16.1.2. Storage

The registrations to give tutoring are through the website. After your registration, your data will be sent to the Internal Affairs (Wordpress, Gmail, One.com), who will enter your data in an Excel-file in which the contact details of students who want to give tutoring are stored (Dropbox). The data will be deleted after two academic years, so students who have given tutoring can be contacted again.

16.2 Receiving tutoring

You can request tutoring by reacting to the offerings on the website of Flow. Only members can request tutoring.

16.2.1. Data

If you register for tutoring (receiving party) via de website of Flow you will be asked for the following data:

E-mail: correspondence.

Name: identity, correspondence.

16.2.2. Storage

The data of a student is collected through the e-mail that the student sends to Flow (Gmail, One.com). The information will be stored in an Excel-file in which the data of students who want to receive tutoring is stored (Dropbox). This data is stored until the end of the academic year in which the student wanted to receive tutoring.

17. Course evaluation

17.1 Data

If you fill in a course evaluation via de website of Flow you will be asked for the following data:

- **Name:** identity.

- **E-mail:** correspondence.

- **Course:** insight.

- Academic year following the course: insight.

- Passed in one go: insight.

- Language of the course: insight.

- Teachers of the course: insight.

- **ECTS course:** insight.

- Examination course: insight.

- **Opinion:** insight.

Course load: insight.



Positive points: insight.Negative points: insight.

- **Member:** insight.

17.2 Storage

Writing a course review is done through the website (Wordpress, Gmail, One.com). You write the review through a contact form. The content of the form will be sent to the Secretary, who will check the review and ask the Internal Affairs to publish it afterwards on the website.

18. Contact form for companies

18.1 Data

If you fill in a contact form for companies via de website of Flow you will be asked for the following data:

- Company name: correspondence.

- **Name:** correspondence.

- **E-mail:** correspondence.

- **Subject:** correspondence.

Message: correspondence.

18.2 Storage

When you send an email to Study Association Flow via the website (Wordpress, One.com) this will be sent to the External Affairs (Gmail).

19. WhatsApp

To keep up to date on upcoming activities, you can choose to participate in the Flow Information Group on WhatsApp. Furthermore, during trips and trips of Flow, a WhatsApp group is often created by the association for that trip. You can also contact Flow through WhatsApp-Business.

19.1 Flow Information Group

To stay informed on upcoming activities through WhatsApp, you can choose to participate in the Flow Information Group. It is your own choice to join the group. You may share the following information with other members:

- **Name**: it is possible to shield your name from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.
- **Profile photo**: it is possible to shield your profile photo from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.
- **Phone number**: if you are added to a WhatsApp group, everyone will be able to see your phone number.
- **Info**: it is possible to shield your info from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.

Nowadays, it is possible to set up WhatsApp in such a way that it is not possible for anyone to add you to a group.

Joining this WhatsApp group is your own choice. Members may join and leave the group at any time.



19.2 WhatsApp group trips and trips

A WhatsApp group is often created prior to a trip. In the registration form you can indicate if you would like to be added to this WhatsApp group.

If you indicate that you would like to be added to the WhatsApp group, you still have partial control over what information other travelers see of you.

- **Name**: it is possible to shield your name from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.
- **Profile photo**: it is possible to shield your profile photo from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.
- **Phone number**: if you are added to a WhatsApp group, everyone will be able to see your phone number.
- **Info**: it is possible to shield your info from people who do not have you added in their contacts. You can do this in the privacy settings of WhatsApp.

Nowadays, it is possible to set up WhatsApp in such a way that it is not possible for anyone to add you to a group. If you agree to join the WhatsApp group of a trip, make sure your settings enable the commissioner of the trip to add you to a group.

20. Discord

On Discord, members can connect to Flow's server. On the Discord, all rooms are protected for people who are not connected to the server, except for two rooms. This concerns the room with the conditions and the room intended for the acceptance messages. After reading the terms and conditions, one is asked to send a message of agreement in the appropriate room. When a member decides to join then the member shares the following data with Flow and others:

- **Name**: when agreeing to the terms and conditions the member mentions his/her name. This information is visible to all people who visit this room.
- **Study:** when agreeing to the terms and conditions the member mentions his/her study (CIS, CSAI, or DSS). This data is visible to all people visiting this room.
- **Username:** when participating in the Discord, other members of the Discord can see the username

After posting this, one is assigned the appropriate study, which allows the member to visit the studio related rooms for his/her study. This member category is visible to members of the Discord server. On Discord, there are 5 member categories:

- CIS student
- CSAI student
- DSS student
- TiU Employee
- Admin (Study Association Flow)

Any further information one provides on the Discord server is completely optional and therefore one's own choice. The data is all stored in the rooms of Discord are and is not exported to any external file or server.



21. Chatfunction

On the website, there is an option to send a chat message to Flow. These messages are received by the board, and they will answer them. When the sender sends a message, no personal information is sent in the direction of the recipient. The only thing the receiver can see from the sender is the message. Names, email addresses, etc. are not revealed. Instead, there is a code such as CF48UV (previous code is fictitious). This makes the chat an anonymous means of communication.

When personal information is needed to answer the question, it will be requested from the sender. When the sender then shares these with Flow, one has agreed that Flow is in possession of these data. This data is then not stored anywhere, other than in the chat itself.

22. Doodle

Doodle is a platform which can be used to for example vote. For the General Members Meeting in February 2021, this platform was used during the online meeting. Through the platform, members could vote. The data the members share on Doodle are:

- **Name**: on Doodle you enter your name. This made it possible to see whether everybody had voted, and no non-members were included in the final numbers.

The data which was stored after the use of Doodle, were the number of votes per option. The personal data got deleted after the minutes of the General Members Meeting of February 2021 were completed.

23. Snapchat

Snapchat is a temporary photo and video sharing platform that can be used on smartphones. Flow manages an account under the account name *svflow* that allows members to share photos and videos with their own account. This account is not public and 'friends' of this account are limited to Flow members, alumni, donors and possible partners. The management of the Snapchat account lies with the Daily Board. If you want to have a photo or video shared by Flow's account, you can do so by voluntarily sending a photo or video with unlimited playback time to Flow's account. If this entry complies with the house rules established (to avoid misconduct), it will be posted on Flow's story. The member hereby shares the following data:

- **Username**: This is linked to the personal account and appears when sharing the photos/videos.
- **Any public account information**: The member may have potentially public information such as a description or location on their personal account. Sharing this information can be disabled in Snapchat's settings.

By sharing a photo or video, the member agrees that this material may be shared on Flow's Snapchat story. The username of the member will be displayed during the sharing of this photo or video. If there is an objection to sharing on the Snapchat story afterwards, this can be reported by sending an email to privacy@svflow.nl or sending a private message to Flow's account via Snapchat itself.



24. Rights

Based on valid Dutch and European law you, as a concerning party, have certain rights when it comes to personal data that is processed by or on behalf of us. Below you may find an explanation of these rights and how you, as a concerning party, can invoke these rights.

24.1 Right of inspection

You have the right to see all the data that Flow has of you. This is only possible if you request a meeting in the Flow Office, because only members of the Daily Board are able to collect all your data. You can request a meeting by sending an e-mail to privacy@svflow.nl.

24.2 Right of rectification

Flow is obliged to change your personal data known to the administration of Flow if this data is incorrect. You can change your data on the website under 'Membership'. After you've completed the form, the Secretary will contact you when your data have been changed.

24.3 Right of filing a complaint

If you want to file a complaint, you can send an e-mail to privacy@svflow.nl and we will help you as soon as possible.

24.4 Right to deletion of your data

You have the right to ask Flow to stop using your data and to delete all data known to the administration of Flow. This also means that you need to deregister for the association, because the data you provide to Flow are necessary to be a member of Flow. Therefore, you can only invoke the right to deletion of your data by deregistering. You can do so through the website under 'Membership'.

24.5 Portrait rights

Everyone who is visible in a photo or video of Study Association Flow, has the right to request the deletion of that photo or video. You can send a request to privacy@svflow.nl.