



## **Privacy Statement Hotline against child sexual abuse material on the Internet**

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## **1. Introduction**

The Hotline against child sexual abuse material on the Internet (hereinafter: 'The Hotline'), part of the Expertise Bureau Online Sexual Abuse, exists since 1985 and aims to prevent and combat online sexual child abuse and sexual exploitation of children. Through the Hotline's webform, individuals are able to (anonymously) report child sexual abuse material on the internet. The Hotline is also part of the International Association of Internet Hotlines ('INHOPE'), the international network of hotlines.

When reporting to the Hotline, individuals can leave personal data if they wish. The Hotline considers it of great importance that personal details are carefully processed, stored, acquired and secured. The Hotline adheres to the General Data Protection Regulation ('GDPR') when processing personal data, effective since 25 May 2018. This privacy statement explains how and which of the personal data you provide is collected and processed, for which purpose this processing takes place, and how this processing is secured.

## **2. Processing personal data**

Personal data means any information relating to an identified or identifiable natural person. This may include, for example, a name, email address and IP address of your computer. Images and/or videos on which a person is visible are considered personal data. The Hotline collects (sensitive) personal data on a large scale.

The following personal data may be processed by the Hotline in the following situations.

When child sexual abuse material on the internet is reported:

- First name
- Last name
- URLs to websites, photos and videos
- Description of the material which is being reported
- Location of the material
- IP address of the location where the material is hosted

The data provided may also contain the following (sensitive) personal data of the persons depicted on the reported images:

- First name
- Last name
- Address
- Personal characteristics
- Identification data
- Criminal data
- Data revealing ethnicity or race
- Data concerning a natural person's sex life or sexual orientation

When contacting the Hotline about general inquiries via email, the following personal data may be processed:

- Name and address details
- Email address
- Phone number
- Organization
- Payment details (when an invoice is sent)
- Curriculum vitae
- Cover letter, letter of recommendation
- Photos / videos of applicants
- Information about training (s)
- Certificate of good conduct

This personal data can be obtained as follows:

- A. Via the report form on the Hotline's website (Meldpunt Kinderporno)
- B. When contacting the Child Pornography Hotline by email
- C. From the Dutch police
- D. Through sister organizations that are connected to the INHOPE network

The Hotline does not collect excessive amounts of data or data that are not relevant for the purposes for which they were collected.

### **3. Purposes of processing and legal basis**

The Hotline processes personal data for the following purposes:

- To assist the Dutch police, such as the Team to combat Child Pornography and Child Sex Tourism (in Dutch: 'TBKK') and Interpol with the identification of perpetrators and victims of child sexual abuse, so that further sexual abuse can be stopped and/or prevented;
- To (have) photos and/or videos containing child sexual abuse removed from the Internet by hosting providers / TLD registrars and/or website owners by means of a request to take the material offline, thereby preventing repeat victimization;

- To compile statistics and trends relating to the growth, dissemination and removal of child sexual abuse material on the internet;
- For handling correspondence in the context of daily operations;
- To answer general questions that come in by email; and
- For the realization and execution of an agreement concluded with you.

The Hotline has a legitimate interest to process personal data to be able to carry out the regular activities of the Hotline, unless your interests, fundamental rights or fundamental freedoms weigh more heavily. The Hotline implemented the following objective in its statutes: "Preventing and combating (online) sexual child abuse and sexual exploitation of children." Individuals who want to report child sexual abuse on the internet are referred by the Dutch police to the Hotline or find the Hotline via the internet. It is the task of the Hotline to analyse whether images that are reported are illegal. To be able to process your report, it is necessary to process the personal data which you provide to the Hotline. In addition, the Hotline has a legitimate interest for processing personal data in the context of carrying out its regular business activities. Because of the sensitive nature of the data which a (future) employee of the Hotline handles, the Hotline also has a legitimate interest to ask for a Certificate of Conduct.

In addition, the Hotline processes sensitive personal data based on a vital interest. This processing is necessary to protect the vital interests of victims of child sexual abuse. By processing images of child sexual abuse, the Hotline assists the Dutch police to identify children who are (at present) victims of child sexual abuse. Sexual abuse of children can have major negative consequences for the victims. It is therefore vital for the child to prevent sexual abuse as quickly as possible, so that further damage may be prevented. Images of child abuse that are uploaded may also result in repeated victimization of the person concerned. Children can accidentally encounter the material themselves years later, or may be extorted with the material to perform sexual acts with the person concerned, or for financial reasons. Those involved are also not able to give permission for the processing physically or legally.

The Hotline also processes criminal data. This data is processed on the basis of established agreements with the Dutch Public Prosecution Service and the Dutch police as well as to protect the vital interests of the victims of child sexual abuse.

By drawing up statistics, the Hotline knows how many reports of images of sexual abuse are handled, the extent to which illegal material is distributed on the internet, and in what forms the abuse takes place. Based on this, the Hotline can test campaigns to report are aimed at the right target group and to gain insight into which groups of people can have information about sexual child abuse. It should be noted that the final statistics are anonymous and therefore do not contain any personal data.

Furthermore, the Hotline may process personal data because of a contractual obligation to which you may be a party. The Hotline may also process personal data on the basis of a legal obligation, for example when processing tax data. It is not possible to process less personal data for the purposes mentioned above.

#### **4. Disclosure to third parties**

In principle, the personal details of the reporter are not shared with a support organization or the Dutch police, unless the reporter indicates that he / she wants to have contact with an organization or the Dutch police. In addition, the Hotline will never share personal data for commercial purposes. Links to images containing personal data may be shared with other parties if they lead to illegal material or if the domain name conflicts with the terms of use of the registrar. If the URLs lead to images of child sexual abuse, the links may be shared with the Dutch police, Interpol, (members of) the International Association of Internet Hotlines (INHOPE) and hosting providers which host the illegal material (also outside the European Union) for the purposes set in paragraph 3. In some cases, the Hotline may share your information due to a legal obligation.

When information is exchanged with an organization outside the European Union or the European Economic Area, this information is only exchanged when the receiving organization complies with one of the appropriate safeguards as referred to in Articles 45 and 46 of the General Data Protection Regulation or if the transfer can be based on Article 49.1(d) of the General Data Protection Regulation.

#### **5. Security measures**

The Hotline implemented appropriate technical and organizational measures to protect personal data against unintentional or unlawful loss or against any form of unlawful processing.

#### **6. Retention period**

After your report has been processed, your personal data will not be stored for more than two months. As soon as the URLs leading to child sexual abuse material have been passed on to the police, any sister organizations, INHOPE and the hosting provider, website owner or top level domain registrar to take the content offline, the hotline will, where applicable, remove and / or anonymize the data. In most cases, the personal data is immediately taken offline by the hosting provider and/or website owner, after which the reported URLs no longer refer to personal data or, at least, child sexual abuse material. In some cases, the Hotline is required by law to store data longer. For example, this is the case with invoices that may contain personal data. The Hotline has a legal obligation to store these documents for seven years. Personal data from your application procedure will be stored for six months. Then this data will be deleted.

#### **7. Your rights**

You may contact the Hotline if you:

- want to know whether we process or have processed your personal data;

- want to know what personal data we have;
- want to know the purpose for which we have processed your data;
- to whom the Hotline may have provided the data;
- want to rectify your data;
- want to delete your data;
- want to transfer your data to another party;
- want to limit the use of your data;
- want to know the origin of the data, if known.

You will receive a written response to your request within four weeks after the Hotline has received your request. We may request additional information from you after you have sent us your request to confirm your identity. Exercising your rights is free, unless the request would require unreasonable efforts. In that case, the Hotline reserves the right to request fair compensation. Certain rights mentioned above can only be exercised in certain cases. The Hotline will assess whether you are able to exercise a certain right after receiving your request. You can send your request to [fg@eokm.nl](mailto:fg@eokm.nl) or by mail to:

Expertisebureau Online Kindermisbruik  
T.a.v. F.E. van Schuppen  
Postbus 11544  
1001 GM Amsterdam

## **8. Objection**

You have the right to lodge a complaint with the supervisory authority. In most cases this will be the Dutch Data Protection Authority (AP). The Dutch Data Protection Authority supervises the processing of your data in the Netherlands. The address is:

Autoriteit Persoonsgegevens  
Bezuidenhoutseweg 30  
2594 AV Den Haag

Mailing address:  
Postbus 93374  
2509 AV Den Haag

0900-2001201 (Consultation hours 10am-12am)  
0900-3282535 (Data breaches)  
070-8888 500 (for Business)  
070-888 501 (Fax)

[www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

## **9. Links to other websites**

On the website of the Hotline, links may be placed that refer to websites of third parties. The Hotline is not responsible for the processing of your personal data on these websites. To gain insight into the processing of personal data on these websites, you may consult the privacy statement of the organization in question.

## **10. Adjustments**

The Hotline reserves the right to make changes to this statement. The most recent version of this statement will be available at <https://www.meldpunt-kinderporno.nl/privacy/>.

## **11. Contact**

You may contact us if you have a question or a complaint, which you can send to the Data Protection Officer of the Expertise Bureau Online Sexual Abuse on [fg@eokm.nl](mailto:fg@eokm.nl) or to the following postal address:

Expertisebureau Online Kindermisbruik  
T.a.v. F.E. van Schuppen  
Postbus 11544  
1001 GM Amsterdam