

WaterMensen

Privacy Policy

Applicable to: watermensen.com and all WaterMensen Programmes

Version 2.0 | Effective date: October 10th 2026 | Language: English

1. Who We Are

This Privacy Policy describes how WaterMensen collects, uses, and protects your personal data across all WaterMensen Programmes, including the Coffee Machine Chat Challenge (CCC).

Data Controller:

- Trading name: WaterMensen
- Legal name: Zoe van de Water
- Registered as: Autonoma (self-employed), Spain
- Fiscal identification number (NIE): Z0194143M
- Address: C. la Gaviota, 6, 38588 Abades, Santa Cruz de Tenerife, Spain
- Email: connect@watermensen.com

WaterMensen is the data controller for all personal data collected via its website, sign-up forms, checkout, and programme delivery. Where third-party processors are used (see Article 6), WaterMensen has entered into appropriate data processing agreements.

2. What Personal Data We Collect

2.1 Data you provide directly

When you visit the website, sign up for the challenge, purchase a product, or enrol in a programme, WaterMensen may collect:

- Name and email address (provided at sign-up, at checkout, or via contact forms)
- Payment information for paid products (processed by Stripe; WaterMensen does not store card details)
- Your phone number and the messages and voice notes you send, if you join the WhatsApp group or the VIP line
- Information shared during intake conversations, sessions, or via email and WhatsApp
- Language background, professional context, and learning goals (shared voluntarily)

2.2 Data collected automatically

When you visit watermensen.com, standard technical data may be collected automatically, including:

- IP address and browser type
- Pages visited and time spent on the website
- Referral source (how you arrived at the website)
- Whether you open and click emails we send you (basic email statistics)

Website data is used only in aggregated, anonymised form to understand how the website is used. No individual user profiles are built from it.

3. Why We Process Your Data

WaterMensen processes personal data only for clearly defined purposes and on a valid legal basis under the GDPR.

3.1 To deliver programmes and services

Legal basis: performance of a contract (Article 6(1)(b) GDPR)

This includes:

- Providing access to the free challenge, VIP, and other WaterMensen Programmes
- Sending the challenge emails, videos, workbook, and assignments
- Running the CCC WhatsApp group and the VIP line
- Scheduling and conducting 1:1 and group sessions via Zoom or Google Meet
- Sharing session notes and progress materials via Google Docs
- Providing access to the Online Academy
- Processing payments via Stripe

3.2 To manage the client relationship

Legal basis: performance of a contract (Article 6(1)(b) GDPR)

- Sending transactional emails such as sign-up and order confirmations, access instructions, and session reminders
- Responding to questions and requests via email or WhatsApp
- Maintaining session notes and a learning record in Google Docs

3.3 To comply with legal obligations

Legal basis: legal obligation (Article 6(1)(c) GDPR)

- Retaining financial records (invoices and payment data) for 7 years as required under Dutch and Spanish tax law
- Responding to lawful requests from competent authorities

3.4 Newsletter and email updates

Legal basis: legitimate interest (Article 6(1)(f) GDPR), being our interest in keeping participants informed about WaterMensen and related programmes.

When you sign up for the challenge or purchase a product, you are automatically subscribed to the WaterMensen newsletter. This is stated next to the sign-up button and the pay button. You can unsubscribe at any time, with one click on the unsubscribe link in any email or by contacting connect@watermensen.com. You also have the right to object to this processing. Unsubscribing from the newsletter does not affect your participation in the challenge or programme.

4. How Long We Keep Your Data

- Financial and payment records (invoices, transaction data): 7 years from the date of the transaction, in accordance with Dutch and Spanish tax law
- Session notes and personal learning records: 2 years after the end of the programme or the last interaction, whichever is later
- Email correspondence and WhatsApp messages: 2 years after the end of the client relationship
- Newsletter subscription data: for as long as you are subscribed, plus 1 year after you unsubscribe (to document your opt-out)
- Website analytics data: aggregated and anonymised; no individual retention

After the applicable retention period, personal data is deleted or permanently anonymised.

5. Your Rights Under the GDPR

As a data subject, you have the following rights:

- Right of access: you may request a copy of the personal data WaterMensen holds about you
- Right to rectification: you may request correction of inaccurate or incomplete data
- Right to erasure: you may request deletion of your personal data, subject to legal retention obligations
- Right to restriction: you may request that processing be restricted in certain circumstances
- Right to data portability: you may request your data in a structured, machine-readable format
- Right to object: you may object to processing based on legitimate interests, including the newsletter, or for direct marketing purposes
- Right to withdraw consent: where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing

To exercise any of these rights, please contact connect@watermensen.com. WaterMensen will respond within 30 days.

If you believe your rights have not been respected, you have the right to lodge a complaint with a supervisory authority. In the Netherlands, this is the Autoriteit Persoonsgegevens (autoriteitpersoonsgegevens.nl).

6. Third-Party Processors

WaterMensen uses the following third-party tools and services that may process personal data on its behalf. Each processor is bound by a data processing agreement or standard contractual clauses where applicable.

Stripe (payment processing)

- Purpose: processing payments for WaterMensen Programmes
- Data shared: name, email address, payment data
- Location: United States (EU-US Data Privacy Framework compliant)
- Privacy policy: stripe.com/privacy

systeme.io (sign-up forms, email delivery, newsletter, and online learning platform)

- Purpose: collecting sign-ups, sending challenge emails and newsletters, hosting and delivering the Online Academy and programme materials
- Data shared: name, email address, access credentials, learning progress, email statistics
- Location: France (European Union)
- Privacy policy: systeme.io/privacy-policy

Google Workspace (Gmail, Google Drive, Google Docs)

- Purpose: client communication, session notes, document sharing, and video sessions
- Data shared: name, email address, session content, notes
- Location: European data centres where available; Google LLC, United States (EU Standard Contractual Clauses apply)
- Privacy policy: policies.google.com/privacy

Zoom (video sessions)

- Purpose: conducting online 1:1 and group sessions
- Data shared: name, email address, session recording (only with prior written consent)
- Location: United States (EU Standard Contractual Clauses apply)
- Privacy policy: zoom.us/privacy

WhatsApp (Meta Platforms Ireland)

- Purpose: the CCC group, the VIP line, and informal client communication and scheduling
- Data shared: name, phone number, and message content
- Location: Meta infrastructure; EU-US data transfers under Standard Contractual Clauses
- Privacy policy: whatsapp.com/legal/privacy-policy
- Note: in a WhatsApp group, your name, phone number, and messages are visible to the other members. WhatsApp is not used for sharing sensitive or confidential programme content.

WaterMensen does not sell personal data to third parties and does not share personal data with any party other than those listed above, except where required by law.

7. International Data Transfers

Some of the third-party processors listed in Article 6 are based outside the European Economic Area (EEA), in particular in the United States. WaterMensen ensures that such transfers take place on the basis of appropriate safeguards, including:

- Adequacy decisions by the European Commission
- Standard Contractual Clauses (SCCs) approved by the European Commission
- Participation in the EU-US Data Privacy Framework where applicable

You may request further information about the specific transfer mechanisms in place by contacting connect@watermensen.com.

8. Cookies & Website Tracking

WaterMensen's website may use cookies and similar tracking technologies for basic website functionality and analytics purposes.

Where consent is required for non-essential cookies, this will be requested via a cookie banner on first visit. You may withdraw or adjust your cookie preferences at any time via the website settings or your browser.

WaterMensen does not use cookies for advertising or cross-site tracking purposes.

9. Security

WaterMensen takes appropriate technical and organisational measures to protect personal data against unauthorised access, loss, or misuse. These measures include:

- Password protection and access controls on all accounts used to store client data
- Use of encrypted communication channels (HTTPS, secure email)
- Limiting access to client data to WaterMensen and, where necessary, co-coaches bound by confidentiality obligations

In the event of a personal data breach that poses a risk to your rights and freedoms, WaterMensen will notify the relevant supervisory authority within 72 hours and inform affected individuals as required by law.

10. Changes to This Privacy Policy

WaterMensen may update this Privacy Policy from time to time. The current version is always available at watermensen.com/privacy and shows the effective date at the top of the document.

For material changes affecting how your data is processed, WaterMensen will notify active clients and subscribers by email with at least 14 days' notice before the change takes effect.

11. Contact

For questions, requests, or complaints about this Privacy Policy or the processing of your personal data, please contact:

- Email: connect@watermensen.com
- Response time: within 30 days

If you are not satisfied with WaterMensen's response, you have the right to file a complaint with the Autoriteit Persoonsgegevens (Netherlands) at autoriteitpersoonsgegevens.nl or the Agencia Espanola de Proteccion de Datos (Spain) at aepd.es.