

Privacy Policy

Version 3.0

Effective Date: 27 October 2026

1. Introduction

Blue Orange Wave ("we", "us", or "our") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, share, and protect personal data when you use our website, products, digital content development services, and related business services.

We process personal data in accordance with the General Data Protection Regulation (GDPR) and applicable Dutch privacy laws.



Innovate today,
Safer tomorrow

2. Who We Are

Blue Orange Wave B.V.(Blue Orange Wave)
Loosduinsekade 355
2571 CE Den Haag
The Netherlands

Email: info@blueorangewave.com
Website: www.blueorangewave.com

Chamber of Commerce Number: 70585709

3. How We Use Personal Data

We may collect and process:

- Contact details such as name, email address, phone number, and company information.
- User account information for our products.
- Learning and training data, such as enrolment, progress assessment results, and certifications.
- Customer-provided content used to create digital learning solutions.
- Technical information such as IP address, browser type, device information, and usage data.
- Billing and payment information.

4. Why We Process Personal Data

We use personal data to:

- Provide and support our products.
- Develop and deliver digital learning content.
- Manage learner access, progress, and reporting.
- Communicate with customers and users.



Innovate today,
Safer tomorrow

- Manage contracts, billing, and administration.
- Improve our services and product performances.
- Ensure security and prevent fraud.
- Comply with legal obligations.

5. Legal Basis for Processing

We process personal data based on:

- Performance of a contract;
- Compliance with legal obligations;
- Legitimate business interests;
- Consent, where required.

Where processing is based on consent, you may withdraw your consent at any time.

6. Data Controller and Data Processor

Blue Orange Wave acts as a Data Controller for its own business activities, including website operation, sales, marketing, and administration.

For customer data processed through our products or during digital learning development projects, Blue Orange Wave generally acts as a Data Processor on behalf of the customer, who remains the Data Controller.

Where required, we enter into a Data Processing Agreement (DPA) with our customers.

7. Sharing Personal Data

We do not sell personal data.

We may share personal data with trusted service providers that support our operations, including hosting providers, cloud services, analytics providers, payment processors, and professional advisers.



Innovate today,
Safer tomorrow

Where required, we ensure appropriate contractual and security safeguards are in place.

8. International Transfers

Where personal data is transferred outside the European Economic Area (EEA), we use appropriate safeguards, such as European Commission-approved Standard Contractual Clauses or equivalent legal mechanisms.

9. Data Retention

We retain personal data only as long as necessary for the purposes described in this policy or to comply with legal obligations.

Customer-owned data is retained according to contractual agreements and customer instructions.

10. Cookies

We use cookies and similar technologies to:

- Ensure websites and platforms function properly;
- Remember user preferences;
- Improve performance and security;
- Analyze website and platform usage.

We use four categories of cookies:

- Necessary Cookies – required for platform functionality.
- Functional Cookies – remember preferences and settings.
- Analytics Cookies – help us understand usage and improve services.
- Marketing Cookies – measure marketing effectiveness.

Where required by law, we obtain consent before placing non-essential cookies. You can manage your cookie preferences at any time through our cookie settings.

11. Security

We use appropriate technical and organizational measures to protect personal data, including access controls, encryption where appropriate, security monitoring, backups, Non-Disclosure Agreements, and employee confidentiality obligations.

12. Your Rights

Subject to applicable law, you may have the right to:

- Access your personal data;
- Correct inaccurate information;
- Request deletion of personal data;
- Restrict or object to processing;
- Request data portability;
- Withdraw consent;
- Lodge a complaint with a supervisory authority.

To exercise your rights, contact us at:

support@blueorangewave.com and use as subject PRIVACY POLICY

13. Children's Privacy

Our services are intended primarily for business, professional, and educational use. We do not knowingly collect personal data from children under 18 unless supported by an appropriate legal basis.

14. Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website.

Blue Orange Wave B.V., Loosduinsekade 355,
2571CE The Hague, The Netherlands

15. Contact

Blue Orange Wave B.V.
Email: support@blueorangewave.com
Website: www.blueorangewave.com

If you have concerns about how we handle your personal data, you may also contact the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) via www.autoriteitpersoonsgegevens.nl.



Innovate today,
Safer tomorrow