

# Maison Sovrène®

by Daniëlla Eikmans

## PRIVACY POLICY

Effective 1 April 2026

Maison Sovrène® is committed to protecting your personal data. This Privacy Policy explains which data we process, for what purpose, on what legal basis and how we safeguard your privacy. We process personal data in accordance with the General Data Protection Regulation (GDPR) and the Dutch Implementation Act (UAVG).

This Privacy Policy applies to all processing of personal data by Maison Sovrène®, including processing in the context of mentorship, guidance, biofeedback, digital products, events, retreats and the use of our AI-driven tools.

We may update this Privacy Policy if our services or applicable legislation change. The most current version will always apply and will be published on our website.

### 1. IDENTITY & CONTACT DETAILS

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**Trade name:** Maison Sovrène®

**Owner:** Daniëlla Eikmans

**Address:** Lagunesingel 110, 6642 EC Beuningen, the Netherlands

**Chamber of Commerce:** 52207382

**VAT number:** NL001211885B79

**Email:** info@maisonsovrene.com

**Website:** www.maisonsovrene.com

**GDPR contact person:** Daniëlla Eikmans van Dorst

### 2. WHAT PERSONAL DATA DO WE PROCESS?

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Maison Sovrène® processes personal data in the context of the following activities. We process only the data that is necessary for the stated purpose.

#### A. Mentorship & Guidance

- First and last name.
- Email address and telephone number.
- Address details (for invoicing and correspondence).
- Financial data (bank account number, Chamber of Commerce number).
- Company name and business information.

- Recordings of online sessions (video and audio), solely where applicable and with your consent.

## **B. Biofeedback & Biometric Data (Sovrène Signal™)**

Within certain programmes, Maison Sovrène® uses the Sovrène Signal™ methodology. In this context, the following special categories of personal data may be processed, exclusively on the basis of your explicit consent:

- Heart rate variability (HRV) and readiness score.
- Sleep quality and sleep phases.
- Cycle phase (optional, as indicated by you).
- Energetic scores and aggregated indices (Energetic P&L).
- Stress index and activity data.

Important: we process only aggregated and calculated scores — no raw sensor or heart rate data. We do not store biometric data in our systems. Data is collected via wearables purchased by you, such as an Oura Ring. You retain ownership of your data at all times.

*Express disclaimer: the biofeedback analyses of Maison Sovrène® are intended solely to support personal and professional development. They do not constitute medical advice, diagnosis or treatment. Please always consult a qualified healthcare professional for any health-related concerns.*

## **C. Sovrène Oracle™ (AI Module)**

Maison Sovrène® provides access to Sovrène Oracle™, an AI-driven micro-guidance module. In the context of this tool, the following data may be processed:

- Text and questions entered by you in the chat interface.
- Aggregated energy zone (Green/Orange/Red) based on Sovrène Signal™ data, if shared by you.
- Calendar context (type of work block based on Kairos Coding™), where applicable.
- Anonymised user ID (no name or email address stored in the AI database).

Raw biometric data is never used in AI prompts. AI output is supportive in nature and does not replace professional judgement. You remain fully responsible for any decisions you make based on AI output.

## **D. Digital Products & Online Environment (The Huddle)**

- Name, email address and login credentials for access to the online learning environment.
- IP address (for security and prevention of misuse).
- Content of community contributions, responses and messages.
- Account data and access history.

## **E. Events & Retreats**

- Name, email address and telephone number.
- Dietary requirements or other relevant health information (solely if voluntarily provided by you and strictly necessary for the organisation).
- Payment details.

## **F. Newsletter & Marketing**

- First and last name.

- Email address.

#### **G. Contact & Relationship Management**

- Name, email address and telephone number.
- Correspondence, including emails and messages via social media.
- Company name and other business details.

### **3. PURPOSES & LEGAL BASES FOR PROCESSING**

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We process your personal data on the following legal bases:

#### **Performance of the Agreement (Art. 6(1)(b) GDPR)**

- Carrying out mentorship, guidance and related Services.
- Providing access to digital products and the online learning environment.
- Invoicing and financial administration.
- Organisation of events and retreats.

#### **Explicit Consent (Art. 9(2)(a) GDPR)**

The processing of special categories of personal data (biometric data and health-related data) requires your explicit consent. This consent is recorded in the Client Agreement. You may withdraw your consent at any time without this affecting the lawfulness of processing prior to withdrawal. Withdrawal may be submitted via [info@maisonsovrene.com](mailto:info@maisonsovrene.com).

#### **Legitimate Interests (Art. 6(1)(f) GDPR)**

- Securing our systems and preventing misuse (IP logging).
- Informing existing clients about new services and products that align with the services they have engaged.
- Relationship management and business network development.

#### **Consent (Art. 6(1)(a) GDPR)**

- Sending newsletters and commercial emails.
- Use of testimonials on the website and social media.

#### **Legal Obligation (Art. 6(1)(c) GDPR)**

- Retaining financial records in accordance with the statutory retention period of 7 years.

### **4. SPECIAL CATEGORIES OF PERSONAL DATA & GDPR SAFEGUARDS**

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Biometric data and health-related data are special categories of personal data within the meaning of Article 9 GDPR. Maison Sovrène® applies the following additional safeguards for the processing of such data:

- Processing takes place exclusively on the basis of your explicit, informed and documented consent.
- We process and store only aggregated scores and indices; raw sensor or heart rate data is never stored in our systems.
- Our AI systems use only the anonymised energy zone (Green/Orange/Red), not the underlying biometric values.
- You have the right to withdraw your consent at any time, whereupon processing ceases immediately and the data will be deleted at your request.
- We carry out a light Data Protection Impact Assessment (DPIA) for biofeedback processing activities, as required when processing special categories of personal data.

## 5. AI TOOLS & DATA PROCESSING

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Maison Sovrène® uses AI applications to support its services. We apply the following principles:

- AI output shall never replace the professional judgement of Maison Sovrène® or any other qualified professional.
- We do not use AI for automated individual decision-making or profiling with adverse consequences for you.
- No raw biometric data or directly identifying personal data (name, email) is included in AI prompts. Users are identified via an anonymised user ID.
- Messages and embeddings are stored in encrypted form and retained for a maximum of 30 to 90 days, unless you explicitly request earlier deletion.
- Where we use AI platforms provided by third parties (such as OpenAI or Anthropic), processing within your own account with that provider falls under the responsibility and privacy terms of that third party. We refer you to the respective privacy policies.

The use of AI may vary per service and may be expanded or modified over time. The most current version of this policy always reflects the current situation.

## 6. SHARING WITH THIRD PARTIES & PROCESSORS

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Maison Sovrène® does not share your personal data with third parties unless this is necessary for the performance of the Agreement, we are legally required to do so, or you have given explicit consent.

We work with the following external processors, with whom a Data Processing Agreement has been concluded in accordance with Article 28 GDPR:

### Payments & Invoicing

- Mollie: processing of payments and invoice data.

### Online Learning Environment & Community

- Huddle B.V.: hosting of digital products and The Huddle environment (including sub-processor BunnyNet for video content).

### Biofeedback & Dashboard

- Metabase (EU VPS): visualisation of aggregated biometric scores and business KPIs.

- Oura Health Oy: wearable platform from which the client exports or shares data via token (processing under Oura's own responsibility).
- Zapier/Make: automation of data flows between systems.

### AI Module

- OpenAI / Anthropic: LLM processing for Sovrène Oracle™ (processing under the responsibility of the respective provider).
- Supabase (EU): storage of anonymised embeddings and conversation history.

### Email Marketing

- MailerLite: management and sending of newsletters and commercial emails.

### Transfer Outside the EEA

Our starting point is to work with parties that store personal data within the European Economic Area (EEA). Where transfer outside the EEA is unavoidable (for example when using AI platforms), this takes place exclusively on the basis of Standard Contractual Clauses (SCCs) approved by the European Commission or an adequacy decision.

## 7. RETENTION PERIODS

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**Financial data:** 7 years after the end of the financial year (statutory retention obligation).

**Business correspondence and guidance-related data:** 5 years after the end of the Agreement.

**Biometric data:** We do not store raw biometric data. Aggregated scores are retained for a maximum of 12 months after the end of the Agreement, unless you request deletion earlier.

**AI conversations and embeddings (Sovrène Oracle™):** A maximum of 30 to 90 days, with the possibility of deletion upon request.

**Account data for the online environment (The Huddle):** For the duration of the access period and a maximum of 3 months after access is terminated.

**Newsletter subscribers:** For as long as you wish to receive the newsletter; upon unsubscribing, data will be deleted upon request.

## 8. SECURITY

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Maison Sovrène® implements appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration or destruction. When selecting all systems and tools we use, security and privacy take precedence over design or ease of use. We work as much as possible with parties that protect their data rigorously and store their servers within the EU. However, data incidents can never be entirely ruled out.

The main measures in place are:

- Encrypted SSL/TLS connections for all data in transit.
- Multi-factor authentication (MFA) on all systems containing sensitive data.
- Encryption of stored data at rest and in transit.

- Zero-Trust access policy: every dashboard and AI panel is protected behind verified access.
- Data minimisation: personally identifying data (name, email) is never stored in analytics or AI databases; an anonymised client ID is used instead.
- Role-based access rights: you see only your own data; Maison Sovrène® has a separate guide view.
- EU hosting of all sensitive data (Sovrène Privacy Standard).
- Regular review of security risks and timely installation of updates.

In the event of a notifiable data breach, Maison Sovrène® will comply with its statutory reporting obligations to the Dutch Data Protection Authority and, where applicable, to you as the data subject.

## 9. YOUR RESPONSIBILITIES AS A CLIENT

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We do everything we can to keep your personal data secure. At the same time, you as a client carry your own responsibility for the data you share with us and the way you manage your access to our systems.

We ask you to:

- Share only the data you consciously and willingly choose to share. You decide what information you provide.
- Keep your account credentials (username and password) strictly personal and not share them with others.
- Contact us immediately at [info@maisonsovrene.com](mailto:info@maisonsovrene.com) if you suspect your account has been compromised, that credentials have been shared unintentionally, or that data has been lost. We can then act quickly to address the situation.
- Take your own appropriate measures to secure your devices, accounts and access to our systems, such as using a strong password and locking your device.

### Oura Ring & the Oura App

Within certain programmes, you will receive an Oura Ring from Maison Sovrène®. You install the Oura app on your own phone. The Oura app and the data collected and stored within it fall outside Maison Sovrène®'s systems and are your own responsibility. This means, among other things:

- Securing access to the Oura app on your phone — including locking your phone with a PIN or biometrics — is your own responsibility.
- Maison Sovrène® does not have access to your full Oura data. We receive only the aggregated scores you actively share with us via a CSV export or a connection (token) you have authorised.
- Oura Health Oy maintains its own privacy policy for the processing of your data within the Oura app and services. We encourage you to read that policy at: [ouraring.com/privacy-policy](https://ouraring.com/privacy-policy). Oura processes health-related data, including heart rate, temperature and sleep data, under its own responsibility and on the basis of your user agreement with Oura.

Maison Sovrène® is not responsible for the manner in which Oura or any other wearable platform you use processes your data.

## 10. YOUR RIGHTS AS A DATA SUBJECT

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Under the GDPR, you have the following rights with respect to your personal data:

- Right of access: you may request details of the data we hold about you.
- Right to rectification: you may request correction of inaccurate or incomplete data.
- Right to erasure ('right to be forgotten'): you may request deletion of your data, to the extent no statutory retention obligation applies.
- Right to restriction of processing: you may request that processing be temporarily restricted.
- Right to data portability: you may request your data in a structured, commonly used and machine-readable format.
- Right to object: you may object to processing based on legitimate interests.
- Right to withdraw consent: you may withdraw any consent given at any time, without this affecting the lawfulness of processing prior to withdrawal.

Requests may be submitted via [info@maisonsovrene.com](mailto:info@maisonsovrene.com). We will respond to your request within four weeks. We may ask you to verify your identity before fulfilling your request.

If you are not satisfied with the way we handle your personal data, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

## 11. WEBSITE

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Our website consists of a simple HTML page that does not require login. We do not place any cookies on our website, and no third-party analytical or marketing cookies are used.

When you visit our website, your IP address may be stored in the log files of our web server, solely for the management and security of the website. We do not link your IP address to any other identifying data. Logging in is only possible within the secured Huddle environment, which is governed by the terms and privacy policy of Huddle B.V.

## 12. SESSION RECORDINGS & AI TRANSCRIPTS

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Online sessions may be recorded with video and audio, solely with your prior consent. Group recordings of programme sessions may be shared with other participants in the same programme. Individual recordings are available to you alone.

AI transcripts and summaries may be generated from online sessions. For group sessions, these may be used for quality assurance and the further development of our services. For individual sessions, the summary is shared only with you.

Participation in sessions and the sharing of information during sessions is at your own initiative and responsibility. Within the online community, you may delete your own messages. In recordings, this is not always possible, as these are also made available to other participants.

## 13. SOVRÊNE PRIVACY STANDARD

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Maison Sovrène® applies the Sovrène Privacy Standard as its internal framework for protecting your data:

- EU hosting of all sensitive and biometric data.
- Zero-Trust access before any dashboard or AI panel.

- Only aggregated indices visible in the community view; raw biometric data is never displayed.
- Data portability and deletion upon request within 30 days.
- Transparent retention periods and no sale of data to third parties.
- Your body and business data belong to you.

## 14. CHANGES TO THIS POLICY

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Maison Sovrène® reserves the right to amend this Privacy Policy. You will be notified in advance of any material changes via email or via the website. The current version is always available at [www.maisonsovrene.com](http://www.maisonsovrene.com).

## 15. CONTACT

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

**Email:** [info@maisonsovrene.com](mailto:info@maisonsovrene.com)

**Address:** Lagunesingel 110, 6642 EC Beuningen, the Netherlands

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