

## PRIVACY STATEMENT

### 1. Who are we?

Your privacy is very important to us. That's why we wrote this privacy statement (hereinafter the "Statement"). The purpose of this Statement is to describe how personal data are collected and used by us, Igepa Belux nv, having its registered office in Belgium, Nijverheidslaan 4, 9880 Aalter and registered in the Belgian Crossroad Bank for Enterprises under company number 0416.723.381 (hereinafter referred to as "we").

Our further contact details can be found under point 12 of this Statement, as well as the contact details of our data protection officer.

Unless otherwise stated, we are the data controller for the personal data collected under this Statement. A "data controller" refers to the person who determines the purposes and means of the processing of personal data.

Regardless of which personal data we process or when and how we process your personal data, we always follow the following principles :

- personal data must be fairly and lawfully process ;
- personal data must be processed for specific purposes only and not for anything else ;
- personal data must be adequate, relevant and not excessive ;
- personal data must be accurate and up to date ;
- personal data must not be kept for longer than it is needed ;
- personal data must be processed in line with individuals rights ;
- personal data must be kept secure ;
- personal data must not be transfer to others countries without adequate protection.

### 2. How do we receive and process your information?

We collect information about you from a variety of sources, including:

- information we collect from you directly in the framework of the services you have requested from us ;
- information we collect about you when you visit our website, and social media pages, use our services, or view our online advertisements;

### 3. Which data do we collect?

Which personal data we collect, depends on your specific situation or the specific services you request.

We collect personal data of your representatives, employees and managers. You may want to give us your name and contact information (phone number or/and email address) to communicate with you and/or to do business with us as a customer, a supplier or a business partner.

## **4. Why do we need your data?**

We use the data we collect for the following purposes, described in more detail below:

- (1) to provide our services;
- (2) to send communications, including promotional communications.

The information that we collect, either directly or indirectly, may be combined to help us improve its overall accuracy and completeness and to help us better tailor our interactions with you.

### **4.1. Providing our services.**

We use personal data of your representatives, employees and managers for the purposes of providing services, with respect to requirements on conformity, regulations, risk management and quality control as well as for various business purposes such as customer relationship and client account management.

### **4.2. Communications**

We use the data we collect to deliver and personalize our communications with you. The information you provide to us, as well as the information we have collected about you indirectly, shall be used to keep you and/or your representatives, employees and managers informed of Igepa's professional and social activities and of any other subject that could be of interest to you and/or any one of them.

If you and/or your representatives, employees or managers no longer wish to receive such information, you and/or they can send a request to this effect by e-mail at all times. Our contact details are mentioned under point 12.

You may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in our e-mails you may receive. Our contact details are mentioned under point 12.

We advertise our products and services on others' web sites like Facebook or LinkedIn. Please familiarize yourself with those web site operators' or network advertisers' privacy statements to understand their practices relating to advertising, including what type of information they may collect about your internet usage.

## **5. What are the reasons and legal basis for our processing?**

Processing personal data must of course be done for legitimate reasons only.

We use and share your personal data based on your consent and this for the purposes mentioned in this Statement. You and/or your representatives, employees or managers are at any time entitled to withdraw your consent. If you and/or your representatives, employees or managers wish to do so, please contact us. Our contact details are mentioned under point 12 of this Statement.

## **6. With whom else do we share personal information?**

We may share the abovementioned data with any local or foreign entity within our network, including those which support the Igepa office policy and management and with service providers engaged by Igepa.

We may also use third-party service providers to perform certain processing on our behalf.

In case we share your information, we take technical, organizational and contractual measures to ensure that your personal information is exclusively processed for the purposes mentioned in this Statement. We shall use only third parties providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet all legal requirements and ensure the protection of the rights of the data subject.

Only if we are required to do so by law, your personal information may be provided to supervisory agencies, fiscal authorities and investigative agencies.

## **7. Where do we process and store your data?**

Personal data collected by us may be stored and processed in Belgium, or in any other country with Igepa presence.

We do however not intend to transfer personal data outside the European Economic Area.

## **8. How long do we keep your data?**

We will retain your data for the period necessary to fulfill the purposes detailed in this Statement. We will retain and use your data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **9. How do we secure your data?**

Your personal information is treated as strictly confidential and we have taken the appropriate technical and organizational security measures. We implement reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. We also require that our processors protect such information from unauthorized access, use and disclosure.

## **10. What are your rights?**

We adhere to the European and national data protection law applicable in Belgium, which includes the following rights:

- if the processing of personal data is based on your consent, you have a right to withdraw consent at any time for future processing;

- you have a right to request from us access to and rectification of your personal data. You can send us a request to the contact details mentioned under point 12 of this Statement.
- you have a right to object to the processing of your personal data, including the right to object to direct marketing;
- you have a right to restrict processing;
- you have a right to lodge a complaint with a data protection authority;
- you have a right to erasure, also known as ‘the right to be forgotten’. The broad principle underpinning this right is to enable you to request the deletion or removal of personal data whether there is no compelling reason for its continued processing.

## 11. Any questions or complaints?

Should you have any questions about the processing of your personal data, about exercising your rights or about our privacy policy, please feel free to contact us. The contact details are:

- [info@igepa.be](mailto:info@igepa.be)
- Tel +32 (0)9 325 45 45
- Fax +32 (0)9 325 45 40

We also have a Data Protection Officer. His name is Dirk Martens. You can contact him here if you have any questions regarding our processing and your privacy. His contact details are

- [dmartens@igepa.be](mailto:dmartens@igepa.be)
- Tel +32 (0)9 325 45 18
- Fax +32 (0)9 325 45 10

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Privacy Commission. All information can be found at: <https://www.privacycommission.be/en>.

## 12. How to deal with updates to this Statement ?

We may modify or amend this Statement from time to time at our discretion. We encourage you to periodically review this Statement to be informed about how we are protecting your information.