

DATA PROTECTION POLICY PERSONAL

General information

The protection of your privacy is of utmost importance to us and we want to inform you as far as possible, respect your rights and allow you to monitor what happens to your personal data, in accordance with European Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

This Privacy Policy (the "Privacy Policy", or the "Policy") is therefore intended to inform all individuals concerned, hereinafter referred to as "You" or "Your", about the way we collect and use such personal data and the means available to the individual concerned to control such use.

This Policy applies to data collected and processed in the frame of our services as well as on our website <https://camalotbelgie.be>

You will find below information about the data we collect, why we collect them, how long we retain them, your privacy rights and how you can exercise them.

1. Scope of this Privacy Policy

This Privacy Policy sets out the principles and guidelines for the protection of Your personal data collected in connection (i) with services provided on behalf of our customers and (ii) with the use of our website and the services related to.

The notion of personal data (hereinafter "Personal Data") refers to any information relating to an identified or identifiable natural person, which is "identifiable" when it can be identified, directly or indirectly, especially by reference to an identification number or to one or more elements specific to it.

In order to avoid any misunderstanding, this Privacy Policy only applies in the context of our relations with natural persons; in the case of clients or prospects acting as legal persons, this Privacy Policy only applies to Personal Data relating to natural persons who represent or act in their capacity as representatives of such a legal person (such as agents, servants or any other contact person).

In contrast, "non-Personal Data" is information that does not identify a natural person.

2. Who is responsible for your data

The person responsible for processing your data is CAMALOT BELGIË BVBA, a Belgian company with registered seat located in Belgium, 1800 Vilvoorde, Leuvensesteenweg 248Fb, registered under the company number 0675.582.333 (hereinafter "CAMALOT", "us" or "our").

3. Who is protected by this Privacy Policy?

This Privacy Policy applies to Personal Data that we process as data controller.

CAMALOT acts as data controller for the identification and contact data of the customer's contact persons collected by CAMALOT and for the data generated by the use of the services provided by CAMALOT to the customer, including our website <https://camalotbelgie.be>.

4. What do we mean by "Personal Data processing"?

By "processing of Personal Data" we mean any processing of data that can identify you as a natural person.

The concept of "processing" is related to any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

5. On what legal basis do we collect and process your Personal Data?

Personal Data are collected :

- due to the execution of our contractual relationship;
- on the basis of your consent, in particular with regard to our commercial information or your requests made online or by e-mail;
- on the basis of legal obligations, especially in tax matters.

Where such processing is not necessary for the proper performance of our contract or is not based on your consent, it is then based on CAMALOT's legitimate interests as a professional, in order to follow-up of your files, management and prevention of fraud, ensure efficiency to execute our contracts, provide our services and comply with our legal obligations, identify the means enabling us to improve services to our customers, protect the commercial, financial and economic interests of CAMALOT.

6. What Personal Data can we process as data controller?

7. The Personal Data you share with us

We process the Personal Data you provide to us, which may be communicated by email, letter, telephone or in writing, for example, when you complete an online form or by e-mail.

These are surnames, first names, head office address, telephone number, email, etc.

In this context, you may be required to communicate data of your employees, agents and/or servants to us, and we would like to draw your attention to the fact that it is your responsibility to inform them that Personal Data are collected and processed by us.

8. Personal Data collected by our systems

We assign and collect a number of references that may fall within the scope of Personal Data to enable you to make the best use of and services (for example, a customer number, an e-mail address, an identifier, etc).

9. Personal Data collected by performing our services

In the frame of our services, we may collect and process Personal Data of any kind of subjects, knowing that such collection is needed to the proper execution of our services.

10. Personal Data we obtain from third parties

We purchase marketing data and contact information within companies via the company [**]

11. Categories of Personal Data

- Customer Data

We collect Personal Data within our systems which can be combined under the theme "Customer data";

This includes Personal Data that enables us to identify you as a customer (for example, your name and identification documents such as a double-sided copy of your identity card), Personal Data that

enables us to contact you (for example, your address, e-mail address and telephone number) or billing and payment data (including data relating to your creditworthiness and VAT number for self-employed persons) and any other preferences that you communicate to CAMALOT via our customer service department (for example your language preference);

Legal ground for processing: Contractual performance

- Navigation data

When you browse our website, we may process the following Personal Data: your IP address, the type and language of your browser, the software, the type and brand of device you use while connecting to our website, the length of your visit to our website and the internet address from which you access our website, the pages you visit, the weblinks you click on and other actions you take on our Website;

Legal ground for processing: Legitimate interest

- Data communicated by means of the Contact Form available on our website

We process the Personal Data that you provide us by sending email to info@camalot.com made available to all users of our website who wish to contact us;

The information you give us via this form is communicated to our staff members according to the purpose of your request and is then stored and processed if and to the extent necessary to respond to your request;

Legal ground for processing: Legitimate interest

12. For what purposes do we use your Personal Data?

13. CAMALOT's general commitment - principle of limitation

We process Personal Data for certain purposes, in which case we limit ourselves to processing only those data that are essential for achieving the intended purpose.

Thus, we use Personal Data when necessary:

- in connection with the preparation, performance or termination of our contract;
 - to satisfy the legal or regulatory provisions to which we are subject;
- and/or
- to defend our legitimate interests, in which case we always take care to preserve a balance between these interests and the respect of your private life.

If the processing of your Personal Data is not necessary for one of these purposes, we always ask for your permission to process this type of data.

14. Our processing activities

In practical terms, we collect Personal Data in view of the following purposes:

- if you visit our website to collect information and/or ask a question about our services or when you subscribe, for example, to our newsletter, we need your contact details; the information we receive about you in this pre-contractual phase is only used to provide you with the information you requested, in the way you wish;
- in order to carry out the delivery of our services;

- to improve our services, we may process your usage data to evaluate and improve our offering, so we can tailor our services even better to your needs;
- in order to inform you about our (new) products, we may use your data to offer you (in writing, by telephone or electronically) new products or special offers that may be of interest to you, we may also approach you if you are no longer a customer, up to a maximum of 2 years from the end of our relationship, and your privacy settings determine the extent to which messages you receive and how you may subscribe or unsubscribe;
- when you become a CAMALOT's customer, we may ask you for a copy of the front of your identity card so that we can determine your identity and prevent identity theft; we may also check your creditworthiness based on the CAMALOT services you choose; we may carry out this check to prevent you from entering into obligations with us that you cannot financially assume; we also want to prevent CAMALOT's bills from remaining unpaid, which is why we can search internal and external databases for information;
- in order to monitor our performance, we may use your data and profile to evaluate our services, including customer feedback on our services (e.g. through market research), data we obtain during our customer interviews or interventions, customer questions;
- in order to comply with our legal obligations, in many cases we are legally obliged to retain certain Personal Data concerning you, in particular in tax matters;
- we may use your anonymous aggregate data for, for example, internal and external reporting on the use of our services, where the data that is used cannot be linked to a specific individual, and the information we obtain from these analyses is used to evaluate our current product and service portfolio and processes and to modify them based on new developments;

Regarding the information collected via our website, the data may be used in one of the following ways:

- to personalize your experience (your information helps us to better respond to your individual needs);
- to improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you);
- to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs);
- to send periodic emails;
- if you sign up for a CAMALOT newsletter and explicitly agree to receiving mailings from us, the email address you provide may be used to send you information, respond to inquiries, and/or other requests or questions, in addition to receiving occasional company news, updates, related product or service information, etc.

15. Automated decision

CAMALOT does not make automated decisions - based on profiling or otherwise - that may have legal consequences for you or that affect you significantly, except :

- if it is essential for the conclusion or execution of your contract (for example, the credit check or the closure of your CAMALOT services in the event of non-payment);
- if permitted by law (for example, to detect tax fraud);

or

- if we have your express permission to do so.

In these situations, you will be informed in advance about the implementation of the automated decision, your right to demand human intervention and how you can challenge the decision.

16. How do we protect your Personal Data?

17. Our technical and organizational measures

We make every effort to ensure that your Personal Data is protected to the greatest extent possible and to guarantee its confidentiality.

Our employees/contractors have been duly trained in the proper management of confidential data that they may become aware of in the context of our collaboration, and as part of each project involving the processing of Personal Data, we first assess the security and protection of Personal Data, protecting your interests first and foremost.

For the protection of your data, we apply various technical measures to protect your Personal Data against unauthorized access and use, loss or theft, namely: password protection, firewall, antivirus, detection of intrusions and anomalies and access controls for our employees.

The number of employees/contractors of our company or group with access to your Personal Information is limited and the employees/contractors concerned are carefully selected and only have access to your Personal Data to the extent that they need such information to properly perform their tasks.

18. Where your data is stored

Your Personal Data are stored on computer servers located in [*] at the company [*] as well as at our head office.

19. Do we sell your Personal Data to third parties or transfer your data to third parties ?

20. Data transfers

This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential except if:

- your data will only be transmitted for the purposes for which CAMALOT processes this data itself and this transmission is strictly limited to the data that these third parties need for the task they perform on our behalf. We ensure that they process your data, just like us, in a safe, respectful and prudent manner and we provide adequate contractual guarantees to this effect;

We may, for example mention, the share/transfer of data between companies of the Group CAMELOT, for example the company located in Netherlands;

- we make some of our databases accessible to third parties who perform certain services on our behalf and assist us in the delivery of our services, such as sales agents, independent technicians who maintain our network and (external) customer service staff who assist our customers on a daily basis, your data is only transmitted for the purposes for which CAMALOT itself processes your data and this transmission is strictly limited to the data these third parties need for the task they perform on our behalf, and we ensure that they process your data in the same way;
- there is a legal obligation to do so;
- there is a legitimate interest for CAMALOT or the third party concerned;

we will only transfer your Personal Data if your interest or your fundamental rights and freedoms do not prevail and you will always be informed in a transparent manner (except in the case of

legal exceptions), for example, your Personal Data may be share with credit controllers, collection agencies and legal service providers, as well as partners with whom we collaborate in a specific action.

- you give us your express permission;

If CAMALOT provides Personal Data to third parties in situations other than those mentioned above, this transmission will always take place by means of an explicit notification, providing you with all necessary and available explanations on the third party in question, the purpose of this communication and its processing;

- in order to assert, exercise, or defend legal claims, and there is no reason to assume that you have an overriding legitimate interest in your data not being shared.

21. International processing of your Personal Data

Insofar as Personal Data are processed outside the European Union, including in case of share or transfer of Personal Data to companies of the Group CAMALOT we ensure by contractual or other measures that such data benefit from an appropriate level of protection, comparable to the protection they would enjoy in the European Union in accordance with European regulations in force.

22. Opt-out for direct marketing : how can you determine which Personal Data we may use for commercial purposes?

If you do not wish to receive any form of commercial communication, you always have the right to object to the use of your Personal Data for direct marketing purposes, without having to give reasons, by contacting CAMALOT customer service.

You can also:

- if you no longer wish to receive commercial mail, send an email to info@camalot.com
- if you no longer wish to receive commercial e-mails, use the unsubscribe option in the e-mail in question ; in order to increase the effectiveness of e-mail campaigns, we use software to measure whether our e-mails have been opened and which links have been clicked;
-

Please consider that the fact that you no longer wish to receive commercial communication from us does not of course affect our right to contact you electronically in the context of the performance of your contract or if we are required to do so by law.

23. Safety measures in the event of subcontracting

When processing is to be carried out on CAMALOT's behalf, CAMALOT only uses subcontractors who offer sufficient guarantees as to the implementation of appropriate technical and organisational measures so that the processing meets the requirements of these regulations and guarantees the protection of your rights.

The subcontractor does not recruit another subcontractor without the prior written, specific or general, consent of CAMALOT. In the case of a general written authorization, the subcontractor informs CAMALOT of any planned change concerning the addition or replacement of other subcontractors, giving CAMALOT the possibility to object to these changes.

The processing by a subcontractor is governed by a contract or other legal act under the law of a Member State, which binds the subcontractor to CAMALOT, defines the purpose and duration of the processing, the nature and purpose of the processing, the type of Personal Data and the categories of data subjects, and CAMALOT's obligations and rights.

This contract or other legal act provides, in particular, that the subcontractor:

- (a) processes Personal Data only on documented instructions from CAMALOT, including with regard to transfers of Personal Data to a third country or international organisation, unless it is required to do so under the law of the Union or the law of the Member State to which the processor is subject; in this case, the processor shall inform CAMALOT of this legal obligation before processing, unless the law concerned prohibits such information on important grounds of public interest;
- (b) ensure that persons authorised to process Personal Data undertake to respect confidentiality or are subject to an appropriate legal obligation of confidentiality;
- (c) take all measures required under the security of the processing;
- (d) complies with the conditions referred to in the preceding paragraphs for recruiting another subcontractor;
- (e) take into account the nature of the processing, and shall assist CAMALOT, by appropriate technical and organisational measures, to the greatest extent possible, in fulfilling its obligation to act upon requests made to it by the persons concerned with a view to exercising their rights;
- (f) helps CAMALOT to ensure compliance with the obligations laid down, taking into account the nature of the processing and the information available to the processor;
- (g) at CAMALOT's sole discretion, delete all Personal Data or return them at the end of the processing service, and destroy existing copies, unless the Union law or the law of the Member State requires the retention of Personal Data; and
- (h) make available to CAMALOT all necessary information to demonstrate the compliance with the obligations under this Article and to enable audits, including inspections, to be carried out by CAMALOT or another auditor appointed by it, and contribute to such audits.

To this end, the subcontractor shall immediately inform CAMALOT in writing if, in its opinion, an instruction constitutes an infringement of this Policy or of other provisions of Union or Member State law relating to data protection.

Where a subcontractor of CAMALOT recruits another subcontractor to carry out specific processing activities on behalf of CAMALOT, the same data protection obligations as those annexed to the contract or other legal act between the controller and the subcontractor shall be imposed on that other subcontractor by contract or by means of another legal act under Union law or the law of a Member State, in particular as regards providing sufficient guarantees as to the implementation of appropriate technical and organisational measures so that the processing meets the requirements

If the subcontractor does not fulfil its data protection obligations, the original subcontractor shall remain fully responsible for any breach.

24. For how long will your Personal Data be stored?

Unless otherwise provided herein, your data will be stored only for as long as necessary to fulfill our contractual or statutory obligations or the purposes for which the data was originally collected or for as long as we have a legitimate interest in storing such data.

In all other cases your Personal Data will be deleted, except for such data that we must keep to comply with statutory retention periods. However, in such cases we will restrict data processing, i.e. your data will only be used to comply with statutory obligations.

Your exchanges with CAMALOT customer service are kept for up to 30 days; sometimes the period may be longer, in particular to comply with our legal obligations (for example to meet our accounting and tax obligations, we are required to keep your billing data for up to 7 years) or by legal necessity to retain certain data (in particular your contract, your invoices and your correspondence concerning complaints to this data).

After the applicable retention periods, Personal Data shall be deleted or made anonymous.

Certain data from former customers can be used for a period of 2 years after termination of the contract to recognize the former customer and inform him of new services and promotions from CAMALOT, unless the customer has indicated his disagreement on this subject.

25. What are your privacy rights and how can you exercise them?

26. Overview of your privacy rights

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications. We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

Rights	What does it mean?
1.The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your data and your rights. This is why we are providing you with the information in this Privacy Policy.
2. The right of access	You have the right to obtain a copy of your data (if we are processing it), and other certain other information (similar to that provided in this Privacy Policy) about how it is used. This is so you are aware and can check that we are using your information in accordance with data protection law. We can refuse to provide information where to do so may reveal Personal Data about another person or would otherwise negatively impact another person's rights.
3. The right to rectification	You can ask us to take reasonable measures to correct your Personal Data if it is inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your data where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use your Personal Data in defense of a legal claim.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your Personal Data when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your Personal Data, but may not use it further. We keep lists of people who have asked for further use of their Personal Data to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse certain Personal Data for your own purposes.

7. The right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by us or by a third party. We will be allowed to continue to process your Personal Data if we can demonstrate "*compelling legitimate grounds for the processing which override your interests, rights and freedoms*" or we need this for the establishment, exercise or defense of legal claims.

27. Exercise of your rights

➤ How can I exercise my privacy rights?

You can send us an email at info@camalot.com or contact us by phone at +32 2 251 18 80.

In order to exercise your right of access and to avoid any unlawful publication of your Personal Data, we must verify your identity; in case of doubt or inaccuracy, we will first ask you for additional information (preferably a copy of the front of your identity card).

➤ Are there any fees?

You may exercise your rights of confidentiality free of charge, unless your request is manifestly unfounded or exaggerated, in particular because of its repetitive nature, in which case we have the right and choice - in accordance with privacy legislation - (i) to charge you reasonable compensation (taking into account the administrative costs associated with providing the requested information or communication and the costs associated with taking the requested action), or (ii) to refuse to comply with your request.

➤ In what format will I receive a response?

If you submit your request electronically, the information will be transmitted electronically if possible, unless your request stipulates otherwise; in any case, we will send you a concise, transparent, comprehensible and easily accessible reply.

➤ When will I receive an answer?

Depending on the complexity and number of requests, this period may be extended by two months, and if the deadline is extended, we will inform you within one month of receipt of the request.

➤ What can I do if CAMALOT doesn't respond to my request?

We will always inform you, in our reply, about the possibility of lodging a complaint with the supervisory authority and appealing to the judge.

28. Ask CAMALOT questions

For more information about this privacy policy or for any complaint regarding the processing of your Personal Data via info@camalot.com.

29. Stay informed of adaptations.

CAMALOT may change this Privacy Policy from time to time, for example in the context of market developments and new CAMALOT processing activities, and we will of course inform you in advance via our website or other current communication channels of any changes in content and, where required by law, we will seek your prior consent for our (new) processing activities.

In the event of a conflict, our terms and conditions and the special conditions applicable to specific CAMALOT services take precedence over this Privacy Policy.

30. Supervisory authority.

For complaints concerning the processing of your Personal Data, you can contact the Data Protection Authority, rue de la Presse 35, 1000 Brussels / +32 (0)2 274 48 00 / contact@apd-gba.be / www.autoriteprotectiondonnees.be .