

Privacy Notice

Ref.: 010818 – V2.1



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I. General

The Privacy Notice has been drawn up by BDE Group to apply to all its entities, including:

- Bisoft S.A., with registered headquarters at 1200 Woluwé-Saint-Lambert, chaussée de Roodebeek 331, registered with Banque Carrefour des Entreprises under number BE 0459.160.980;
- Ecologic S.A., with registered headquarters at 1332 Genval, Avenue Albert 1er 6, registered with Banque Carrefour des Entreprises under number BE 0415.053.003;
- I.B.S. Consulting, with registered headquarters at 1332 Genval, Avenue Albert 1er 6, registered with Banque Carrefour des Entreprises under number BE 0445.667.785.
- B.D.E Research.B.S. Consulting, with registered headquarters at 1332 Genval, Avenue Albert 1er 6, registered with Carrefour des Entreprises under number BE 0823.661.840.

Hereafter "BDE Group".

II. Why this Privacy Notice?

Respecting your privacy is a priority for BDE Group. We are aware and respectful of your right to be informed of how we process data and information that could identify you personally, such as your last name, first name, address, telephone numbers, e-mail address, etc. ("your data"), that may be collected when you fill in a contact form, use our services or buy one of our products.

This Privacy Notice sets out to explain how we use your data and the measures we take to protect them, honestly and transparently, as the law requires.

This Privacy Notice is therefore one expression of our commitment to acting transparently, in accordance with the Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data ("the Privacy Act") and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("the General Data Protection Regulation", GDPR).

If you have any questions regarding the processing of personal data, please contact us at privacy@bde-group.be or via the contact form available on our website.

Further information reserved for our customers can be found in the *GDPR Addendum* to our General Terms & Conditions of sale.

III. When do we collect your data?

We collect your data when you make contact with BDE Group, such as when you:

- become a customer or call on our services
- contact us or are contacted by one of our teams
- visit one of our sales outlets
- take part in one of our events
- fill in an online form
- sign up to our newsletter
- apply for a position within the BDE Group

IV. What data do we collect?

The data may include:

- identification data such as your last name, first name, address, e-mail, telephone number, etc.
- electronic identification data such as your user login, password, e-mail address, etc.

- billing data such as means of payment, financial details, account number, VAT number, etc.
- data relating to your products and services

BDE Group does not set out to collect data on individuals under the age of 13, except with the permission of their parents or legal guardians. It is not always possible, however, for us to check whether a visitor to the website is over 13. We therefore advise parents to be aware of and involved in the (online) activities of their children to avoid children's data being collected without the consent of their parents.

If you believe that we have collected personal information on a child without such authorisation, please contact us at privacy@bde-group.be and we will delete this information without delay.

We never use "sensitive" personal data relating to health, behaviour, origins or religious, political or philosophical beliefs.

V. For what purposes do we collect and process your personal data?

Processing your personal data is essential for the smooth running and organisation of our company, and to meet the needs of our customers and suppliers.

BDE Group promises to process your personal data solely for the following purely internal purposes:

- to enable you, as necessary, to access a user profile that allows you to place an order with our online store;
- to offer you a general and personalised service;
- customer administration and management;
- supplier administration and management;
- personnel administration and management;
- delivery and enhancement of products delivered;
- to provide support in the event of questions or comments;
- to contact you as part of a service delivery;
- management of the contractual relationship and performance of a contract;
- management of your payments;
- protection against fraud, criminal behaviour and/or any other behaviour contrary to our General Terms & Conditions;
- to send you information on our professional and social activities or other subjects of potential interest to you, if you have explicitly agreed to receive such offers.

In providing BDE Group with your personal data, you exercise control over your data. If any information proves to be false or incomplete, BDE Group reserves the right to refuse certain interventions scheduled, on either a temporary or a permanent basis.

VI. What is the legal basis for processing your personal data?

BDE Group processes your personal data only in one of the following cases:

- when we have asked your permission to do so and you have agreed. You may retract at any time. Your retraction is applicable solely *post facto* and is not retrospective, and therefore does not affect the legitimacy of any previous processing operations.
- when we are acting in performance of a contract or implementing pre-contractual measures
- when we are required to fulfil a legal or regulatory obligation
- on a "legitimate interest" basis. Where necessary, we make every effort to maintain the balance of BDE Group interests and your own, including the protection of privacy.

Legitimate interests include:

- prevention of fraud and abuse
- management of litigation
- evaluation of the overall customer relationship
- offer of products or services corresponding as closely as possible to your needs and requirements
- process improvement
- direct marketing

VII. How long do we keep your data?

BDE Group retains personal data for no longer than is required to achieve the purpose of processing, whilst complying with the legal and regulatory limits applicable.

When you are a BDE Group Customer or Partner, your data are retained for the duration of the contract and for 3 years following its termination, unless particular legal constraints apply.

When you are a BDE Group Lead, your data are retained for 3 years from your last contact with us, unless particular legal constraints apply.

When you are a candidate for employment by BDE Group, your application data are retained for 2 years, unless your application is successful.

VIII. The security and confidentiality of your data

BDE Group has developed appropriate technical and organisational security measures to avoid the destruction, loss, falsification or modification of personal data, unauthorised access to or erroneous notification to a third party of such data, as well as any other unauthorised processing of such data. Under no circumstances shall BDE Group be held liable for any direct or indirect loss arising from incorrect or unlawful use of personal data by a third party.

Should you have the impression that your data are not adequately secured or that there are signs of abuse, please contact us at privacy@bde-group.be.

IX. Who receives your personal data?

Your personal data are intended in the first instance solely for purposes internal to BDE Group. We take all technical and organisational measures possible to avoid any unlawful access to or use of your personal data.

Your personal data may be transmitted to third parties within the European Union only in the following circumstances:

- you have given your explicit consent to such a transfer;
- the transfer is necessary for the performance of a contract to which you are a party. Disclosure of data to employees, collaborators, agents, subcontractors, suppliers, commercial partners, marketing departments, etc. falls into this category;
- the transfer is necessary for the fulfilment of a legal obligation;
- the transfer is necessary for the protection of your vital interests, or those of another natural person;
- the transfer is necessary to the achievement of BDE Group's legitimate interests.

BDE Group will never transfer your data outside the European Union, to a country that does not provide an adequate level of data protection, within the meaning of Regulation EU 2016/679.

X. What are your rights?

- **Right of access:** you have the right to consult your data at any time, free of charge,
- **Right to rectification:** you have the right to require that any incorrect data be corrected and any data that are inappropriate or no longer useful be deleted. We draw your attention to the fact that you are required at all times to verify the accuracy of the data you provide to us.
- **Right to erasure:** when you no longer wish to allow your data to be processed and you meet the conditions to exercise your right to erasure, we will delete your data from our database.
- **Right to data portability:** as far as may be necessary, you also have the right to the portability of your data under the conditions provided for in the data protection legislation.
- **Right to object:** you have the right to object to any use of your data for direct marketing purposes.
- **Right to restriction of processing:** lastly, you have the right to obtain from BDE Group the restriction of processing of your data, in accordance with the data protection legislation.

If you wish to consult, transfer, modify, correct, restrict processing of or delete your data, you may do so, free of charge, by sending an e-mail, accompanied by a copy of your identity card, to the following address: privacy@bde-group.be.

Likewise, you may also object to the processing of your personal data or put an end to any communication on our part.

Data are rectified or deleted in so far as is possible and as far as technical resources allow. Your request will be attended to at the earliest possible opportunity and within the deadlines provided for in the Regulation, and we will reply as fully as possible to your request, unless this is not possible in the interests of the company or subject to a legal obligation.

In the event of a breach of your personal data posing a risk to your rights and to the protection of your personal data, the supervisory authority will be informed and, if there is a high risk to your rights and freedoms as a natural person, you will be informed as the data subject.

You also have the right to lodge a complaint concerning the processing of your personal data by BDE Group and to the competent data protection authority of your country (in Belgium, the Data Protection Authority).

XI. Modifications to this Privacy Notice

We reserve the right to modify this Privacy Notice in order to comply with the privacy protection legislation in force, or to adapt it to our practices. We therefore invite you to consult the Notice regularly in order to be aware of any modifications.

New versions will be made available on our website.

We will make no amendment of a nature to lower the level of protection of your rights as guaranteed under the Privacy Notice, without obtaining your prior consent.

The BDE Group's confidentiality policy is subject to Belgian law.

The Belgian authorities (the Data Protection Authority, for example) and Belgian courts shall have sole jurisdiction to hear any litigations and complaints that may arise in relation to this declaration or its use or regarding the processing of personal data. In the event of litigation, the courts of Brussels shall have sole jurisdiction.

This Privacy Notice is applicable with effect from 1 August 2018 and was drawn up by BDE Group for all its entities.