

# Privacy statement

Protection of your personal data and respecting your privacy are values that **I-Coats N.V.** highly respects. We treat and protect your information with respect for legislation and regulations, in a fair and transparent manner.

'We', which is **I-Coats N.V.**, is located at the K. Mercierlei 29, 2600 Berchem.

With our privacy statement we would like to inform you about the processing of your personal data. We do this by giving you a broad and clear answer to the following Questions:

- Who do we process personal data from?
- What do we mean by processing personal data?
- Who is responsible for processing your personal data?
- What personal data do we process?
- For what purposes and on the basis of which justifications are we processing your personal data?
- To whom do we pass on your personal data?
- How do we protect your personal information?
- How long do we store your personal data?
- What rights do you have when processing your personal data and how can you exercise these rights?

This privacy statement may be updated to match its content to changes in the regulations. We will inform you about changes via the usual communication channels.

More information on legislation and regulations on data protection and privacy is available on [www.privacycommission.be](http://www.privacycommission.be), the website of the Belgian privacy commission (in particular the Data Protection Authority).

## **1. Who do we process personal data from?**

We process personal data of those persons with whom we have a direct or have had or wish to have an indirect relationship, such as:

- All persons using (at least one of) our products and/or services (we call these persons 'customers'), such as representatives of legal persons (managers or managing directors of companies),
- Persons who show interest in our products and/or services (we call these potential customers 'prospects')

## **2. What do we mean by processing personal data?**

Under personal data, we do not only mean data that you directly identify, but also data that can be indirectly identified:

- Direct identification is possible via personal data such as your name, address, email address, phone number
- Indirect identification is possible through information that can be identified when it is combined with other information.
- The processing of personal data includes every possible operation of this information, such as collecting, storing, using, consulting, modifying, publish, disseminate or destroy them.

## **3. Who is responsible for the processing of your personal data?**

This is the company **I-Coats N.V.**. We are responsible for processing. We decide why and how we process your personal data.

## 4. What personal data do we process?

We only process relevant and/or necessary personal data. We process usually the following (categories of) personal data:

*a) Identity data*

e.g. name, gender, date and place of birth, nationality, address.

*b) Socio-demographic data*

e.g. marital status, family composition, relationships, training, profession.

*c) Contact details*

e.g. language, phone number, email address.

*d) Preferences and interests information*

e.g. interested in our products and/or services, hobbies

*e) Audiovisual data*

e.g. images of surveillance cameras, recording of phone calls

*f) Data from external sources*

e.g. data obtained from legal sources such as State Register, Belgian Official Gazette, National Bank of Belgium

*g) Information provided by judicial or research bodies such as police, public prosecution, research judges or courts*

*h) Data provided by professional data providers*

*i) Data from public sources*

In principle, we do not process data linked to racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, health or sexual orientation.

When you provide personal information about other persons to us, we ask you to inform these persons on it.

## 5. For what purposes and on the basis of which justifications do we process your personal data?

We process your personal data for various purposes or reasons. All these reasons find their justification in the following grounds:

- The assessment for the conclusion of a contract and the execution of a contract
- Compliance with legislation or regulations
- The representation of the legitimate interests of the company **I-Coats N.V.**

We base ourselves today not for processing your personal data with your consent as justification ground. When we do need to ask you for a certain future data processing, your consent is necessary (because this is not based on one of the above justifications). Kindly also know that you have the right to withdraw the authorization at any time.

## 6. To whom do we pass on your personal data?

### 6.1 Employees of I-Coats N.V.

Our employees have access to your personal data only if necessary to provide the best service, within the implementation of their task.

### 6.2 External parties outside I-Coats N.V.

All external parties to whom we are legally obliged to provide your personal data:

- Judicial authorities, such as the police, public prosecutor's office, examining magistrates, courts

- Lawyers (e.g. for bankruptcies) and auditors

In no case we sell your personal data to external parties.

When we cooperate with external parties outside the European Economic Area we take appropriate measurements (such as contractual obligations) to ensure that your personal data in the host country are adequately protected.

## **7. How do we protect your personal information?**

We take appropriate technical and organisational measures to ensure that your personal data are sufficiently protected against inappropriate access, loss or theft, such as:

- IT security measures such as anti-virus software, anti-spyware software, firewalls, encryption (encryption)
- Access controls

## **8. How long do we store your personal data?**

We will never keep your personal data longer than necessary for the reasons for which we have collected the data.

There is no general retention period for personal data. This depends on the type of personal data and the legislation or regulations in force.

So we save:

- Your personal data as a prospect for a maximum of 2 years after our last contact
- Your personal data as a client for 10 years after the termination of the client relationship

We may also store your personal information as evidence in any litigation. In that case, we do not use such personal data.

## **9. What rights do you have when processing your personal data and how can you exercise these rights?**

When we process your personal data, you have the following rights:

- You can review your personal data, have it corrected and have it removed.
- You may oppose a particular use of your personal data.
- You may ask to transfer your personal data to a third party.

### **9.1 You may review, improve, remove and display your personal information**

You can ask us to see your personal details. In this context you can also ask us:

- What personal data we process
- For which we process your personal data
- To whom we transmit your personal data

If you find that your personal information is incorrect or incomplete, you may ask us to improve or complete personal data.

If you suspect that we are unlawfully processing your personal information (for example, your personal data are not (more) relevant), you can ask us to delete your personal data.

### **9.2 You may oppose a particular use of your personal data.**

If you disagree with the way in which we process certain personal data on based on our legitimate interests (e.g. for direct marketing), you can oppose it.

We shall accept such request unless there are compelling reasons not to do so.

### **9.3 You may sometimes refuse your personal data to be fully automatic be processed.**

Some processing of personal data is fully automated (without human intervention). When you disagree with the result of such, full automated decision-making, you can ask or let us know to receive human intervention, and raise why you dispute the decision.

#### **9.4 How can you exercise these rights?**

You can contact us in writing:

- via the contact form on our website
- by e-mail
- via post