
CUSTOMER PRIVACY POLICY

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1. WHO ARE WE

We are NV Algemene Bouwonderneming Vlassak-Verhulst residing at Moerstraat 53 2970 Schilde Belgium with company registration number BE 0439.229.955 .

We care about your privacy and every time we deal with your personal data we do so in accordance with the provisions of the general data protection regulation and the national law relating to the processing of personal data.

We are required under data protection legislation to make the information contained in this privacy policy accessible to you. This privacy policy sets out which measures are taken to protect your privacy when using our services or products, and what rights you have in this respect.

When processing your personal data we are in most cases the "data controller". This means that we determine the purpose and means of the processing.

By using our services and/or products, you agree to the collection and processing of some of your personal data in accordance with the purpose described in our privacy policy. You are invited to read this privacy policy carefully and familiarise yourself with its content.

Laurence Stefens is our Privacy Coordinator and you can reach them at laurence.stefens@vlassakverhulst.com for any questions or to exercise your rights. Future amendments to this policy cannot be excluded. We therefore ask that you read the privacy policy from time to time.

2. PROCESSING OF YOUR PERSONAL DATA

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We try to collect as little personal information as possible in order to achieve our goals.

We comply with data protection laws which require that the personal information we process about you must be:

- Collected only for valid purpose(s) that we have informed you about.
- Used lawfully, fairly and in a transparent way which means in a way that is relevant to the purpose(s) we informed you about, limited only to those purpose(s) and in no way incompatible with those purpose(s).

- Accurate and kept up to date, kept only as long as necessary for the purpose(s) we have told you about and handled securely.

We may request certain information from you in order to enable you to use or purchase our services or products. If you have any questions do contact our privacy coordinator.

More specifically we will collect any or all of the following data elements :

- Address
- Blueprint
- CV / resume
- Company address
- Correspondence content
- Country
- Customer file
- Customer name
- Date & time
- Electronic identification data
- Electronic localisation data
- Email address
- Essential cookies
- Motivatie
- Naam
- Payment balance data
- Personal phone number
- Personal preferences
- Phone number
- Profile preferences
- Projecten
- Property Location Data
- Third party cookies

We rely on you to provide us with correct data. If the data changes, we invite you to let us know, so we can keep the data up to date.

We process the data to allow us to deliver the services/products, and to continually improve the services/products available to you and adapt them to your needs. More specifically we perform the below processing:

- **Sales of goods or services**

Description: Sales and / or delivery of goods or services to customers

Purpose: To ensure proper sales and or delivery of goods or service, enable track & trace and feedback

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Customer name, Email address, Address

Data is processed in the EU

- **Customer invoicing & accounting**

Description: Calculating the fee owed, sending out invoices and ensuring payment

Purpose: To ensure proper payment

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Customer name, Payment balance data, Address

Data is processed in the EU

- **Customer appointments**

Description: Register customer appointments either on paper or on a computer

Purpose: To manage availability and calendar

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Customer name, Date & time, Correspondence content, Email address, Address, Phone number, Country

Data is processed in the EU

- **Correspondence**

Description: Communication with interested parties in electronic or paper form

Purpose: To provide proper service

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal phone number, Customer name, Correspondence content, Email address, Address, Country

Data is processed in the EU

- **Corporate website**

Description: Corporate website for public consultation. May include customer login area.

Purpose: To inform interested and / or business parties

Legal basis: Legitimate interests

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Electronic identification data, Electronic localisation data, Essential cookies, Customer name, Third party cookies, Company address, Correspondence content, Profile preferences, Email address, Address

Data is processed in the EU

- **Aanvraag Brochure**

Description: Geïnteresseerden kunnen een aanvraag indienen om een brochure te ontvangen

Purpose: Brochure aanvragen

Legal basis: Consent

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal phone number, Customer name, Correspondence content, Personal preferences, Email address, Address, Country

Data is processed in the EU

- **Sollicitatie (vacatures)**

Description: Online solliciteren voor een vacature

Purpose: Solliciteren

Legal basis: Consent

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal phone number, CV / resume, Email address, Naam, Motivatie, Projecten

Data is processed in the EU

- **Urban planning & zoning dossiers**

Description: Dossiers and information regarding urban planning and zoning of constructions, buildings...

Purpose: Ensure compliance with urban planning and zoning requirements

Legal basis: Legal obligation

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Customer name, Customer file, Property Location Data, Blueprint, Email address, Address

Data is processed in the EU

- **Customer prospecting**

Description: Gathering of prospective customer information

Purpose: To communicate goods and services to prospective customers

Legal basis: Legitimate interests

Retention period: All prospects that have not converted to customers will be deleted after 2 years

Data items: Customer name

Data is processed in the EU

In the above processing we are the data controller.

Where you provided consent, you have the right to revoke it. You have the right to withdraw your consent at any time.

In case you object to the processing of your data, please contact us so we can evaluate together if a contractual relationship is possible and a continuation of the use of our services is possible.

We also handle supplier data. When we collect, process and store supplier data, we want to make sure we only collect, process and store data we really need and are entitled to handle in this way. In dealing with our suppliers we typically collect, process and store the name, work email and work phone of the person(s) interacting with us. We also collect, process and store the VAT number of our suppliers.

3. PROCESSING OF PERSONAL DATA ON YOUR BEHALF

The specific nature of our relationship makes it unlikely that we will process other people's personal data on your behalf. In the exceptional case that this nevertheless occurs, we are the processor and you are the controller. We will then carry out your instructions for the processing, possible subcontracting, the fate of the data at the end of the agreement and the possible transfer of data. We will therefore take the necessary security measures and assist you in fulfilling your obligations under the GDPR.

4. TRANSFER OF PERSONAL DATA

In order to provide certain services or products we might work with third parties such as IT partners, insurance partners, accounting partners, legal advisors. More specifically we reserve the right to transfer

your personal data to our partners.

- Social media - Facebook / Instagram

Purpose: To promote the company and its services

Legal basis: Legitimate interests

Data items: Electronic localisation data, Date & time, Pictures / images

Data is processed outside the EU

META PLATFORMS IRELAND LIMITED (ex-Facebook) receives the data

- Website analytics & visitor statistics

Purpose: Measuring website & commercial performance

Legal basis: Legitimate interests

Data items: Electronic localisation data, Third party cookies, Date & time, Electronic identification data, Performance cookies

Data is processed in the EU

Google Ireland Limited receives the data

- Social media - Pinterest

Purpose: To promote the firm

Legal basis: Legitimate interests

Data items: Electronic localisation data, Date & time, Pictures / images, Username, Electronic identification data

Data is processed in the EU

Pinterest Europe Ltd receives the data

- Hotjar

Purpose: Optimaliseren van uw website

Legal basis: Consent

Data items: Electronic localisation data, Third party cookies, Date & time, Electronic identification data, Performance cookies

Data is processed in the EU

Hotjar Ltd receives the data

These third parties will generally act as data processor. Please do note that social media platforms, commerce platforms and structural sales partners are often regarded as joint controllers.

If you participate in an online call, meeting, conference,... do note that any data you choose to share will be visible and/or audible to the other participants. Please consider this before sharing your personal details, video, audio or any other data.

In case you object to the transfer of your data, please contact us so we can evaluate together if a contractual relation is possible and a continuation of the use of our services is possible.

Please do note that we may be required by law to process certain data and, as the case may be, to transmit them to the relevant authorities. As this is a legal obligation you can not object this transfer.

5. SECURITY & CONFIDENTIALITY

We undertake to keep your personal data secure & confidential and have established security procedures to avoid any loss, abuse or alteration to this personal data in line with industry best practices.

6. WEBSITE & COOKIES

Navigation on our website may result in cookies being saved to your computer. They simplify the visit and improve your experience. When visiting our website you will be informed of the cookies being used and we will ask you for your consent. Furthermore, each time you visit our website, the webserver automatically processes your IP address and/or your domain name.

We may publish links to websites owned and operated by third parties. If you click on such a link you will navigate to another website. Please make sure you read and understand the privacy policy of that website, as it may differ from our policy and is outside of our control. If you feel unsure or cannot agree with the policy, we suggest you leave that website.

7. SOCIAL MEDIA

If you use the social media functions such as eg “like” or “share” button that may be on our website, or if you visit our social media page, please know that your personal data will be processed by the social media platform. In this processing, the European regulator considers us and the social media platform both to be joint data controllers, which means that we jointly determine why and how your personal data is processed. You can find out how we process your personal data in this privacy statement. You can find information about the processing by the relevant social media platform in their privacy statement. We ask you to read the privacy statement of the social media platform carefully before visiting the social media items on our page or our page on the social media platform.

If we hold an event such as a client network event, opening event, premiere etc. we might have photographers or videographers present. The photos and videos they shoot are purposed to be used in marketing materials and / or published on our social media pages. When you are not the main subject of these materials the data protection authority's guidance is that your GDPR explicit consent is not required. However, should you oppose to us using materials where you are depicted, please let us know.

8. EXERCISING YOUR RIGHTS

In accordance with the general data protection regulation you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Withdraw your prior consent to processing at any time.
- The right to object to a decision based solely on automated processing, including profiling.
- The right to receive your personal data in a structured, commonly used and machine-readable format and have transmit those data to another controller (commonly known as a "data portability request").

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You can exercise your rights by contacting our Privacy Coordinator Laurence Stefens via laurence.stefens@vlassakverhulst.com or at the below company address:

NV Algemene Bouwonderneming Vlassak-Verhulst

c/o Laurence Stefens

Moerstraat 53 2970 Schilde Belgium

9. DATA PROTECTION AUTHORITY

You can direct any complaints and comments to the competent data protection authority at the below address:

Gegevensbeschermingsautoriteit / Autorité de protection des données

Drukpersstraat 35, 1000 Brussel / Rue de la Presse 35, 1000 Bruxelles

<https://gegevensbeschermingsautoriteit.be> <https://autoriteprotectiondonnees.be>