

# **Privacy Notice**

## **Introduction**

This Privacy Notice is designed to inform you about the personal data relating to you which The Privacy Office S.A., with registered office at Rue Haute 81, 4700 Eupen, Belgium and registered with the Crossroads Bank for Enterprises, under the company number BE 0672.648.973 (acting as data controller and hereinafter referred as “**we**”, “**our**” and “**us**”) collects, why we collect and process such personal data, on which legal basis, and how we will handle personal data you provide us with and personal data we learn about you.

## **Legal basis**

We process your personal data on the basis of your specific consent, or because such processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into such contract.

Whenever the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time, without affecting the lawfulness of such processing before the withdrawal of consent.

## **Personal data collected**

We collect personal data relating to you (referred to hereinafter as “**Personal Data**”) through information that we collect in the frame of a contract to which you are party or through information that you consent to provide us via other means (ex. email, evaluation form of one of the trainings). Such Personal Data directly collected is limited to your professional details including your name, first name, function, phone, e-mail address, company name.

## **Use of Personal Data**

Your Personal Data will exclusively be used to the extent necessary to allow us:

- to communicate with you in the context of the performance of a contract to which you are party or to take steps at your request prior to entering into a contract;
- to provide you with e-mails in relation to our products or services provided you have given us, the explicit prior consent to do so, where required under applicable law;
- to communicate with you in relation to our services on the basis of our legitimate interest.

We may not use your Personal Data for new purposes which are as yet unforeseen in this Privacy Notice except on the basis of an applicable statutory permission. In any event, prior to using Personal Data for other purposes, we will inform you about such change to this Privacy Notice. In case of consent-based activities, we will not process your Personal Data for such new purposes without first obtaining your consent.

## **No processing of special category of personal data**

We will not collect or process any special category of personal data relating to you, unless you have given us your explicit consent. The special categories of Personal Data include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or other beliefs of a similar nature, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, health, sex life or sexual orientation.

## **No processing of personal data relating to criminal convictions and offences**

We will not collect or process Personal Data relating to criminal convictions and offences unless such processing is authorized or compulsory under EU legislation or applicable Member State law.

## **Direct marketing**

We will not use your Personal Data for direct marketing purposes without your explicit prior consent, except where authorised under applicable law.

If at any time you decide not to receive any commercial or promotional information from Us, You may, free of charge and without having to provide any justification, opt-out of any direct marketing campaigns and oppose to the future processing of your Personal Data for such purposes by sending us an email at [Office@tpo.solutions](mailto:Office@tpo.solutions) and mention “opt-out” in the subject of your email.

Please note that opting out from receiving promotional messages from us will not prevent you from receiving information that relates to any contract you may have entered into with us.

## **No automated decision-making**

We will not make use of automated decision-making processes, including profiling, unless such decision is either necessary for entering into or performance of a contract between you and us, or authorised by EU legislation or applicable Member State law, or based on your explicit consent. In such case we would inform you about the logic involved in the decision, as well as the significance and the envisaged consequences of such processing for you.

## **Sharing Personal Data and transferring Personal Data to third countries**

We will not make your Personal Data available to any third party and shall not publicly disclose the Personal Data unless such transfers are based on your specific consent, necessary for the performance of a contract entered into between you and us, or when such transfer of Personal Data is otherwise authorised or compulsory by law or by order of an administration or judicial authority.

We may transfer your Personal Data to the following recipients: our email service provider and IT maintenance provider acting as data processors.

Please note that whenever your Personal Data are transferred to processors or third parties located outside the European Economic Area in countries which are not considered by the European Commission to guarantee an adequate level of personal data protection, we will ensure that appropriate measures are implemented according to the applicable national and European legislation relating to data protection. You may obtain a copy of the appropriate safeguards taken or information as to where they have been made available by sending Us an email at [Office@tpo.solutions](mailto:Office@tpo.solutions).

## **Storage duration**

We will retain your Personal Data only as long as necessary for the fulfilment of the purposes described above or as required by applicable data retention laws and statutory limitation periods for claims.

## **Security and confidentiality**

We have implemented technical and organisational measures in accordance with standard industry practices to ensure an appropriate level of security of the Personal Data processed.

## **Children**

We do not knowingly collect any information from children under 16.

## **Your rights**

At any time, you may exercise your right to request access to or rectification of and, as the case may be, erasure of any Personal Data relating to you. You may also object to processing or request a restriction of processing and benefit of a right to data portability (as the case may be), in compliance with applicable data protection law, by sending a signed request form with a copy of your ID card, passport or other proof of identity to [Office@tpo.solutions](mailto:Office@tpo.solutions) or in writing to The Privacy Office, Rue Haute 81, 4700 Eupen - Belgium.

When applicable, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent made prior to such withdrawal.

As a data subject, you have a right to lodge a complaint with a supervisory authority (in particular in the Member State of the European Union of your usual place of residence, your place of work or the place where the violation occurred) if you consider that the processing of Personal Data relating to you infringes the applicable legislation relating to data protection.

## **Effective date and changes**

This Privacy Notice is in effect since 15/01/2019. We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time.