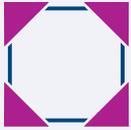


# PRIVACY NOTICE



The purpose of this **Privacy Notice** is to ensure transparency regarding the personal data we process in accordance with Articles 12 to 14 of the GDPR.



**Why is this Notice important for you?**

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**Which data are we processing about you and why?**

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**What happens to your data?**

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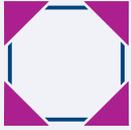
**How do we store your data ?**

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**You can contact us**

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## Why is this Notice important for you?

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### 1. Introduction

# 1. 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.



## Which data are we processing about you and why?

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2. Legal ground for processing
3. Personal data collected
4. No processing of “sensitive” Personal Data
  - 4.1. No processing of special category of Personal Data
  - 4.2. No processing of Personal Data relating to criminal convictions and offences
5. No use of cookie

## 2. Legal ground for processing

Pursuant to Article 6 of the GDPR and as further detailed hereunder, 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; or
- because such processing is necessary for the purposes of **legitimate interests** pursued by us.

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.

## 3. 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 training sessions). Such Personal Data directly collected is limited to your professional details including your last name, first name, function, telephone number, email address, company name, company address.

## 4. No processing of “sensitive” Personal Data

### 4.1. 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.

## **4.2. 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.

## **5. No use of cookies**

This website does not make use of cookies.



## What happens to your data?

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6. Use of Personal Data (purposes)
7. Direct marketing
8. No automated decision-making
9. Sharing Personal Data to third parties and transferring Personal Data to third countries
10. Links to third party websites

## 6. Use of Personal Data (purposes)

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 emails** 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 interests.

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.

## 7. Direct marketing

We will not use your Personal Data for direct marketing purposes without your **explicit prior consent**, except where authorized 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 **privacy@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 or to any other request in relation to a commercial relationship with us.

## 8. 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 authorized 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.

## 9. 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 authorized 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 [privacy@tpo.solutions](mailto:privacy@tpo.solutions).

## 10. Links to third party websites



On certain sections of this website, we provide links to third party websites which are not subject to this Privacy Notice. This may notably the case for the section "**references**". These links are provided as a convenience to you; however please be aware that we have no control over these third parties or their websites and that they will have a different privacy notice applying to information collected from you when you are on their websites. We encourage you to read the privacy notices of all websites carefully before providing personally identifiable information.



## How do we store your data?

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11. Storage duration
12. Security and confidentiality

## 11. 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.

## 12. Security and confidentiality

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



## You can contact us

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- 13. Children
- 14. Your rights
- 15. Effective date and changes

## 13. Children

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

## 14. 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, as the case may be, object to processing or request a restriction of processing and benefit of a right to data portability, in compliance with applicable data protection law, by sending a signed request form with a copy of your ID card or other proof of identity to **privacy@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.

## 15. 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.

This Notice was last updated on **05/02/2019**.