



# VAN HAVERMAET

UW RECHTERHAND

Van Havermaet BV o/v NV, with registered offices at 3500 Hasselt (Belgium), Diepenbekerweg 65, company number 0428.179.774, +32 011/30.13.50, as well as all affiliated companies, hereafter 'Van Havermaet', handles personal data with the utmost care at all times.

This Privacy Policy indicates which personal data is collected and how it is used, as well as how Van Havermaet seeks to ensure an adequate protection of the data concerned.

Van Havermaet will observe the provisions as incorporated in the Law of 8 December 1992 on the protection of the personal privacy with regard to the processing of personal data.

From the moment of its entry into force, the provisions of 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, hereafter 'GDPR', will be observed.

In addition, Van Havermaet will ensure to comply, to the extent possible, to the provisions of the implementing decisions that are taken in accordance with the aforementioned legislation.

## 1.1 PERSONAL DATA

Personal data entail any information relating to an identified or identifiable natural person. A natural person is considered to be 'identifiable' if he can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

As a controller, Van Havermaet can collect e.g. a data subject's name, address, date of birth, telephone numbers, e-mail address and IP-address.

## 1.2 PROCESSING

This personal data is processed and used by Van Havermaet in order to optimize her services and to work as efficient and accurate as possible. Van Havermaet will process the data for, among others:

- the execution of her agreement with clients (the keeping of the accounts, the draft of recommendations or agreements, various types of consultancy, ...);
- the compliance with her legal obligations (e.g. the identification requirement in accordance with the Law regarding the prevention of money laundering and the funding of terrorism);
- the implementation of marketing strategies (e.g. mailing newsletters);
- the execution of (internal) analyses and the development of new products.

The processing of personal data by Van Havermaet will be based on the following legal bases:

- consent given by the client/data subject;
- necessity for the performance of a contract to which the data subject is party;
- necessity for the purposes of the legitimate interests pursued by Van Havermaet, namely to ensure the continuity of its business activities.

Van Havermaet will provide sufficient security regarding the personal data that is stored and processed.

Both Van Havermaet and her appointees will take the appropriate technical and organizational measures to safeguard the processing that will take place.

As far as possible and can reasonably be expected, Van

# PRIVACY POLICY

Havermaet will make sure that the personal data she has in her possession is updated and that incorrect, incomplete and redundant personal data are corrected or deleted.

Moreover Van Havermaet will, as far as possible and can be reasonably expected, make sure to only grant limited access to the personal data to her appointees. This access will be restricted to those appointees that need the personal data in order to execute their duties or to what is necessary information with regard to the requirements of the department.

In this manner Van Havermaet will attempt to offer an appropriate level of security for this personal data and the processing thereof.

The data subject will be required to provide all requested personal data to Van Havermaet following a legal requirement (e.g. with respect to the Law regarding the prevention of money laundering and the funding of terrorism) and/or because it is a requirement necessary to enter into a contract and to enable the execution of that contract.

In case the data subject does not provide the requested personal data, Van Havermaet will not be allowed or able to render the services that have been demanded.

In principle, Van Havermaet will only share the personal data with others if the data subject has given its consent to do so or if it is necessary in order to complete a transaction, to deliver a product or to render a service.

In case of purchases through the web shop the personal data will be shared with the payment provider, which is Mollie BV, with registered offices at 1016 EE Amsterdam (the Netherlands) Keizersgracht 313, KvK-number 30204462.

If necessary, the personal data will also be shared with Van Havermaet's suppliers, in case it is legally required, in case Van Havermaet is involved in a dispute with the data subject, in order to protect Van Havermaet's clients, in order to guarantee product safety and in order to safeguard Van Havermaet's (property) rights.

Van Havermaet will not transfer the personal data concerned to third countries or international organizations.

The personal data that has been collected will be stored by Van Havermaet for a period of ten years starting from the end of the partnership with the data subject, unless certain legal statutes of limitation or retention periods should demand a longer period.

When a data subject visits Van Havermaet's website, it will need to accept the use of cookies. These cookies are used in order to record the data subject's preferences. This information might be used to optimize the functionality of the website.

These cookies may also be used to store settings or to recognize patterns.

Furthermore, web beacons and other similar technologies, as well as Google Analytics are used.

Van Havermaet makes use of profiling in order to carry out targeted mailings of newsletters. This way Van Havermaet will attempt to inform her clients only regarding campaigns and products they might show a particular interest in.

## 1.3 DATA SUBJECT'S RIGHTS

Van Havermaet will facilitate the execution of the data subject's following rights:

- the right of access to its personal data;
- the right to rectification of incorrect personal data;
- the right to erasure of its personal data;



**VAN HAVERMAET**

UW RECHTERHAND

## PRIVACY POLICY

- the right to restriction of processing of its personal data;
- the right to data portability;
- the right to object to automated individual decision-making.

In order to exercise this right/these rights, the data subject will need to send an e-mail in this regard to the following e-mailaddress: [privacy@vanhavermaet.be](mailto:privacy@vanhavermaet.be). Seeing that Van Havermaet will need the necessary assurances regarding the identity of the questioner, the data subject will need to add a copy of its identity document to the request.

Van Havermaet will respond promptly and in principle within one month, to the data subject's request.

In any case the data subject has the right to withdraw its consent regarding the processing of its personal data at any time. However, this withdrawal will not affect the lawfulness of the processing based on that consent before its withdrawal.

### 1.4 CONTACT

Van Havermaet's data protection officer can be contacted at the following e-mailaddress: [dpo@vanhavermaet.be](mailto:dpo@vanhavermaet.be).

Should the data subject believe that the processing of its personal data constitutes a breach of the provisions of the GDPR, the data subject will have the right to lodge a complaint with the competent supervisory authority.

### 1.5 FINAL PROVISIONS

In case of any discrepancies between the provisions of this Privacy Policy and the agreement that has been concluded between Van Havermaet and the data subject, the provisions as stated in the agreement will prevail.

Van Havermaet explicitly reserves the right to amend this Privacy Policy at any time, without any prior notice.