

PRIVACY POLICY OF NV ERA BENELUX

1. INTRODUCTION

NV Era Benelux attaches great importance to the secure, transparent and confidential collection and processing of your personal data. In particular, we wish to protect the data of, amongst others, our customers, subcontractors and suppliers against, amongst other things, loss, leaks, errors, unauthorised access or unlawful processing.

Through this Privacy Statement, we wish to inform you about the collection and processing of your personal data.

We ask that you read this Privacy Statement carefully, as it contains essential information about how your personal data is processed and for what purposes.

By providing your personal data to our company, you expressly confirm that you have taken note of this Privacy Statement and that you expressly consent to it, as well as to the processing itself.

2. SCOPE

This Privacy Statement applies to all services provided by us and, in general, to all activities we carry out.

3. DATA CONTROLLER AND ITS OBLIGATIONS

NV Era Benelux, with its registered office at 8560 Wevelgem, Nijverheidslaan 37, company number 0449.765.046 , is the data controller for your personal data.

When collecting and processing your personal data, we comply with Belgian data protection legislation, as well as the General Data Protection Regulation ("GDPR") from its entry into force on 25 May 2018.

4. PERSONAL DATA

Depending on your activities and your relationship with our company, you provide us with the following personal data:

- a) First name
- b) Surname
- c) Company name
- d) Email address
- e) Telephone number
- f) Address details
- g) IP address

You may be required to provide us with additional information to comply with certain specific legal obligations.

We would like to remind you that you are responsible for all data you provide to us and that we rely on its accuracy. If your details are no longer up to date, please let us know as soon as possible.

You are not obliged to provide your personal data, but you understand that the provision of certain services or collaboration will not be possible if you do not consent to the collection and processing of such data.

5. PURPOSES OF PROCESSING AND LEGAL BASIS

5.1 Customer data

As part of our services and activities, we collect and process our customers' identity and contact details. The purposes of this processing are the performance of contracts with our customers, customer management, accounting and direct marketing activities such as sending promotional or commercial information and our newsletters. The legal bases are the performance of the contract, compliance with legal and/or regulatory obligations and/or our legitimate interest.

5.2 Data relating to suppliers and subcontractors

We collect and process the identity and contact details of our suppliers and subcontractors, as well as any of their (sub)subcontractors, their staff, employees, appointees and other relevant contacts. The purposes of this processing are the performance of this agreement, the management of suppliers/subcontractors, accounting and direct marketing activities such as sending promotional or commercial information and our newsletters. The legal bases are the performance of the agreement, compliance with legal and/or regulatory obligations and/or our legitimate interest.

5.3 Staff data

We process the personal data of our employees, as well as that of potential employees/job applicants, in the context of our human resources management and payroll administration. Given the specific nature of this processing, it is regulated in greater detail in an Employee Data Protection Policy.

5.4 Other data

In addition to the data of customers, suppliers/subcontractors and staff, we also process personal data of others, such as potential new customers/prospects, useful contacts within our sector, network contacts, etc. The purposes of this processing are in the interests of our business activities, direct marketing and public relations. The legal basis is our legitimate interest or, in some cases, the performance of a contract.

6. DURATION OF PROCESSING

We retain and process personal data for a period necessary to fulfil the purposes of the processing and in accordance with the (contractual or non-contractual) relationship we have with you.

Customer data and data relating to suppliers or subcontractors will, in any event, be deleted from our systems seven years after the termination of the contract or project, except where we are required by specific legislation to retain such personal data for a longer period, or in the event of an ongoing dispute for which the personal data is still necessary.

7. RIGHTS

In accordance with and subject to the conditions of Belgian data protection legislation and the provisions of the GDPR, we hereby inform you that you have the following rights:

- Right of access and inspection: you have the right to access, free of charge, the data we hold about you and to check the purposes for which it is used.
- Right to rectification: you have the right to have your inaccurate personal data rectified (corrected), as well as to have incomplete personal data completed.
- Right to erasure or restriction of processing: you have the right to request that we erase your personal data or restrict its processing in the circumstances and subject to the conditions set out in the GDPR. We may refuse to erase or restrict any personal data that is necessary for us to comply with a legal obligation, to perform the contract or to pursue our legitimate interests, for as long as such data is necessary for the purposes for which it was collected.
- Right to data portability: you have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format. You have the right to transmit this data to another data controller.
- Right to object: you have the right to object to the processing of your personal data on serious and legitimate grounds. Please note, however, that you cannot object to the processing of personal data that is necessary for us to comply with a legal obligation, to perform a contract or to pursue our legitimate interests, provided that such data is necessary for the purposes for which it was collected.
- Right to withdraw consent: if the processing of personal data is based on prior consent, you have the right to withdraw that consent. This personal data will then only be processed if we have another legal basis for doing so.
- Automated decision-making and profiling: we confirm that the processing of personal data does not involve profiling and that you are not subject to fully automated decision-making.

You may exercise the aforementioned rights by contacting our company, in particular our contact person: Mr Stefaan Vandenbussche, who can be reached via info@erabenelux.be.

We make every effort to handle your personal data in a careful and legitimate manner, in accordance with the applicable regulations. If, nevertheless, you believe that your rights have been infringed and your concerns have not been addressed within our company, you are free to lodge a complaint with the Data Protection Authority, Drukpersstraat 35, 1000 Brussels, T: +32 (0)2 274 48 00, E: [contact\(at\)apd-gba.be](mailto:contact(at)apd-gba.be)

8. DISCLOSURE TO THIRD PARTIES

Certain personal data collected by us will be transferred to and may be processed by third-party service providers, such as our IT supplier, payroll service providers, accountant or other financial service providers, etc.

It is possible that one or more of the aforementioned third parties are located outside the European Economic Area ("EEA"). However, personal data will only be transferred to third countries that offer an adequate level of protection.

The employees, managers and/or representatives of the service providers or institutions mentioned above, and the specialist service providers appointed by them, are required to respect the confidential nature of your personal data and may only use this data for the purposes for which it was provided.

If necessary, your personal data may be disclosed to other third parties. This may be the case, for example, if we were to undergo a full or partial reorganisation, if our business were to be transferred, or if we were to be declared bankrupt. It is also possible that personal data may need to be disclosed pursuant to a court order or to comply with a specific legal obligation. In such cases, we will make reasonable efforts to inform you in advance of this disclosure to other third parties. However, you acknowledge and understand that, in certain circumstances, this may not always be technically or commercially feasible, or that legal restrictions may apply.

Under no circumstances will we sell your personal data or make it commercially available to direct marketing agencies or similar service providers, unless we have your prior consent.

9. TECHNICAL AND ORGANISATIONAL MEASURES

We take the necessary technical and organisational measures to process your personal data in accordance with an adequate level of security and to protect it against destruction, loss, falsification, alteration, unauthorised access or accidental disclosure to third parties, as well as any other unauthorised processing of this data.

Under no circumstances shall NV Era Benelux be held liable for any direct or indirect damage resulting from the incorrect or unlawful use of personal data by a third party.

10. ACCESS BY THIRD PARTIES

For the purposes of processing your personal data, we grant access to your personal data to our employees, staff and appointees. We guarantee a similar level of protection by imposing contractual obligations on these employees, staff and appointees that are consistent with this Privacy Statement.

11. ANY QUESTIONS?

If, after reading this Privacy Statement, you have any further questions or comments regarding the collection and processing of your personal data, please contact our data protection officer: Mr Stefaan Vandenbussche, who can be reached at info@erabenelux.be.