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## **DATA PROTECTION NOTICE**

### **Acotec NV**

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#### **1. INTRODUCTION**

Acotec NV with registered office in Erembodegem (Belgium) and with company number BE 0448 964 401 attaches great importance to the safe, transparent and confidential collection and processing of your personal data. In particular, we want to protect the information of our customers, subcontractors and suppliers against loss, leaks, errors, incorrect accesses or unlawful processing.

We want to inform you about the collection and processing of your personal data by means of this Data Protection Notice.

We ask that you carefully read this Data Protection Notice, as it contains essential information about how your personal data are processed and for what purpose.

By communicating your personal data you explicitly declare that you have taken note of this Data Protection Notice and expressly agree to it as well as to the processing itself.

#### **2. SCOPE**

This Data Protection Notice relates to all services provided by us and in general to all activities that we carry out.

#### **3. CONTROLLER AND ITS COMMITMENTS**

Acotec NV, with registered office at Erembodegem (Belgium) and with enterprise number BE 0448 964 401, is the controller of your personal data.

We respect the Belgian regulations concerning the protection of personal data. The collection and processing of data will be executed in compliance with The General Data Protection Regulation.

#### **4. PERSONAL DATA**

Depending on your activities and your relationship with our company, you provide us with the following personal data: your identity and contact details (name, address, e-mail address, telephone and mobile phone number). For certain specific legal obligations (electronic attendance registration, 3obis declaration of work), it may be that you provide us with additional information to register your presences (such as E-ID data, Limo number).

We kindly inform you that you bear the responsibility for all information you provide us with and that we rely on its accuracy. If your details are no longer up-to-date, please inform us by return.

You are not obliged to communicate your personal data but you understand that the provision of certain services or cooperation becomes impossible if you do not agree with the collection and processing.

## **5. PROCESSING PURPOSES AND LEGAL BASIS**

### **5.1 Customer data**

In the context of our services and our activities, we collect and process the identity and contact details of our customers, their staff and other useful contacts. The purposes of these processing operations are the execution of agreements with our customers, customer management, accounting and direct marketing activities such as sending promotional or commercial information. The legal grounds are the execution of the agreement, the fulfillment of legal and regulatory obligations (such as, for example, the 3obis declaration of work) and/or our legitimate interest.

### **5.2 Suppliers and subcontractors data**

We collect and process the identity and contact details of our suppliers and subcontractors, as well as their (sub) subcontractor (s), their personnel, employees and other useful contacts. The purposes of these processing operations are the implementation of the agreement, the management of the suppliers/ subcontractors, accounting and direct marketing activities such as the sending of promotional or commercial information. The legal grounds are the execution of the agreement, the fulfillment of legal and regulatory obligations (such as the mandatory electronic attendance registration, the 3obis declaration of work, the attendance list or other obligations in public procurement, etc.) and/or our legitimate interest (such as direct marketing). For the electronic attendance registration, the E-ID data or the Limo number are also processed, if applicable. For direct marketing activities by e-mail (such as a newsletter or invitation for events), permission will always be requested and can also be withdrawn at any time.

### **5.3 Data of personnel**

We process the personal details of our employees in the context of our personnel management and payroll administration. In view of its specific nature, this processing is more extensively regulated in a Data Protection Policy for employees.

### **5.4 Other data**

In addition to the data of customers, suppliers/subcontractors and staff, we also process personal data of others, such as possible new customers/prospects, useful contacts within our sector, network contacts, contacts of experts, etc. The purposes of these processing operations are in the interest of our activities, direct marketing and public relations. The legal basis is our legitimate interest or in some cases the execution of an agreement.

## **6. DURATION OF THE PROCESSING**

The personal data is stored and processed by us for a period that is necessary in function of the purposes of the processing and in function of the (whether or not contractual) relationship that we have with you.

Customer data and data from suppliers or subcontractors will in any case be removed from our systems after a period of 10 years after the termination of the agreement or the project, except for these personal data that we have to keep for a longer period of time on the basis of specific legislation or in case of an ongoing dispute for which the personal data are still necessary.

## 7. RIGHTS

In accordance with and under the terms of the Belgian privacy legislation and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- 1) The right of access
- 2) The right to rectification
- 3) The right to erasure and to restrict processing - We may refuse the erasure and restriction of any personal data that are necessary for us to perform a legal obligation, the execution of the agreement or our legitimate interest, and this as long as this information is necessary for the purposes for which it was collected.
- 4) The right to data transferability
- 5) The right to object - Please note, however, that you cannot oppose the processing of personal data that is necessary for us to perform a legal obligation, the execution of the agreement or our legitimate interest, and this for as long as this information is necessary for the purposes for which they were collected.
- 6) The right of withdrawal of consent

You can exercise the aforementioned rights by contacting the CEO. The contact person for this is: Mr. Wim Schalley with contact details [info@acotec.be](mailto:info@acotec.be).

We understand that privacy is very important to you and we do our best to respect it. If, nevertheless, you are of the opinion that your rights have been violated you can file a complaint with:

Commissie voor de Bescherming van de Persoonlijke Levenssfeer  
Drukpersstraat 35, 1000 Brussel  
Tel. 02 274 48 00  
Fax. 02 274 48 35  
E-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)

You can also turn to a court if you believe that you would suffer damage as a result of the processing of your personal data.

## 8. TRANSFER TO THIRD PARTIES

Certain personal data collected by us will be transmitted to and possibly processed by third party service providers, such as our IT supplier, accountant, auditor, as well as by the government (for example, in the 3obis declaration of work, the electronic attendance registration or competing for public procurement).

It is possible that one or more of the above-mentioned third parties are located outside the European Economic Area ("EEA"). However, personal data will only be forwarded to third countries with an appropriate level of protection.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialist service providers appointed by them must respect the confidential nature of your personal data and can only use these data for the purposes for which they were provided.

If necessary, your personal data may be passed on to other third parties. This may be the case, for example, if we would be reorganized in whole or in part, if our activities would be transferred or if we would be

declared bankrupt. It is also possible that personal data must be passed on pursuant to a court order or to comply with a specific legal obligation. In that case, we will make reasonable efforts to inform you in advance about this communication to other third parties. However, you will recognize and understand that in certain circumstances this is not always technically or commercially feasible or that legal restrictions may apply.

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

#### **9. TECHNICAL AND ORGANIZATIONAL MEASURES**

We take the necessary technical and organizational measures to process your personal data according to an adequate level of security and to protect it against destruction, loss, forgery, modification, unauthorized access or notification by mistake to third parties, as well as any other unauthorized processing of this data.

In no case can Acotec NV be held liable for any direct or indirect damage resulting from incorrect or unlawful use by a third party of the personal data.

#### **10. ACCESS BY THIRD PARTIES**

In view of the processing of your personal data, we grant access to your personal data to our employees and appointees. We guarantee a similar level of protection by making contractual obligations, which are similar to this Data Protection Notice, binding for these employees and appointees.

#### **11. CONTACT DETAILS**

If you have further questions or comments after reading this Data Protection Notice regarding the collection and processing of your personal data, you can contact Acotec NV either by post to Industrielaan 8, Zuid III; 9320 Erembodegem (Belgium) or by e-mail to [info@acotec.be](mailto:info@acotec.be).