EXTERNAL PRIVACY POLICY

The protection of privacy and personal data is very important to VAN HEURCK. With this privacy policy VAN HEURCK wants to inform you about the processing of your personal data. VAN HEURCK shall process the personal data with respect for your privacy and in compliance with the applicable privacy legislation.

VAN HEURCK reserves the right to, at any moment, make updates to this privacy policy. To keep up to date with any changes, we ask you to regularly consult this privacy policy.

This privacy policy was last updated on: March 15th 2019

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1 **DEFINITIONS**

Processing of personal data: Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly.

A processor: A processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

A controller: A controller is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

2 FOR WHOM DOES THIS PRIVACY POLICY APPLY?

This privacy policy applies to all direct customers, visitors, suppliers, applicants and all other persons who are not employees of VAN HEURCK and of whom VAN HEURCK processes personal data as controller.

3 CONTACT DETAILS

Name	: VAN HEURCK	
Company number	: 0415.031.326	
Adress	: Eksterlaar 25, 2100 Anvers	
Email	: info@vanheurck.com	
Telephone number	: +32 (0)3 321 21 05	



4 <u>CONTROLLER</u>

Only when VAN HEURCK acts as data controller article 5 up to and including 10 of this privacy policy are applicable.

If you as data subject want to exercise your rights, always address the data controller (responsible for the processing)

5 WHAT PERSONAL DATA VAN HEURCK PROCESSES?

5.1 Based on the performance of a contract

VAN HEURCK processes personal data necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

When requesting a quote

When you request more info about the services or products of VAN HEURCK you can request a quote through different channels (telephone, website, email, ...). VAN HEURCK processes personal identification data (like name and email) to provide you with an adequate proposal.

When processing an order, following up on invoices and commercial agreements

When you order services or products at VAN HEURCK, VAN HEURCK processes personal identification data and professional data to correctly follow up the order or delivery.

• To produce tailored clothing or clothing with a name tag or by name

When VAN HEURCK produces clothing with a name tag or by name it processes personal identification data and personal characteristics (gender, general measures like S, M, L, XL). To make sure the clothing fits perfectly, it is sometimes needed to take detailed measurements of the data subjects. When the function of the data subject needs to be attached on the cloathing, Van Heurk also processes information about the current job function of the data subject.

When applying for a job

When VAN HEURCK seeks new enthusiastic and motivated employees to join our team, VAN HEURCK processes, during the job applicant procedure, the following categories of personal data: personal identification data, personal details (like birthdate, language, ...), professional career and training history, competences, curriculum vitae, images, work reference.

When creating a user account

Via a form on the website you can register yourself as a customer and you can log in with a userid and password. For this purpose VAN HEURCK processes personal identification and security data (password).

5.2 Based on consent

When processing personal data based on your consent, you always have the right to withdraw your consent. (see 10. what are my rights and how can I exercise them?)

When you subscribe to our newsletter

When you subscribe to our newsletter you give permission for sending a newsletter. VAN HEURCK gives you the opportunity to unsubscribe from the newsletter.

5.3 Based on the legitimate interest

VAN HEURCK processes personal data based on the legitimate interest in which VAN HEURCK has made a balancing test.

• When dealing with a question, offering help or offering information at your request



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You can contact VAN HEURCK through various channels (telephone, correspondence, email, contact form website). We only use the personal data you provide to answer your questions.

Sending direct marketing

VAN HEURCK sends direct marketing and processes personal identification data. VAN HEURCK respects related regulations, whereby only direct marketing is sent if there is a customer relationship, with regard to the same products or services that VAN HEURCK itself delivers. You have the opportunity as a data subject to unsubscribe from this direct marketing.

When improving the quality of the website

VAN HEURCK uses tools to gather statistics and gain insights about the use of the website. This information is anonymized and not linked to your personal information. Analytics tools use cookies. These are text files that are placed on your computer to collect standard internet logging information and behavioral information. You can read more info in our cookie statement.

6 WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

VAN HEURCK does not share your personal data with third parties, unless

- VAN HEURCK has received your prior consent.
- VAN HEURCK is obliged to do so in the context of a regulation or legal procedure.
- VAN HEURCK is requested to do so by legislative or judicial authorities.
- VAN HEURCK organizes an event together with partners or suppliers. The list of participants can/will also be communicated to the partners or suppliers.
- VAN HEURCK is taken over in whole or in part or split up. In this case, VAN HEURCK will impose on the third party the obligation to use the personal data only in accordance with the provisions of this Privacy Policy.

VAN HEURCK may call on certain subcontractors and this in order to outsource some of our services to them, for instance related companies, laundrie companies, IT provider. These subcontractors are not considered as third parties. We ensure that these subcontractors take the necessary technical and organizational measures to process your personal data legally and lawfully and also under no circumstances make it known to third parties.

7 SECURITY OF YOUR PERSONAL DATA

VAN HEURCK recognizes that the security of personal data is part of data protection. Therefore, VAN HEURCK takes appropriate technical and organizational measures to protect your personal data against unauthorized processing or unauthorized access in order to prevent misuse.

With each transfer of personal data to a processor outside the European Economic Area (EEA), VAN HEURCK always complies with the terms of this privacy statement and VAN HEURCK follows applicable data protection laws and regulations to ensure adequate safeguards.

8 STORING YOUR PERSONAL DATA

VAN HEURCK will only keep your personal information for the minimum period necessary to fulfill the purposes set out in this privacy statement. Unless required to resolve disputes or if a longer storage period is required by law. Non-personal information can be kept in time without restriction for statistical purposes.



9 <u>COOKIES</u>

Cookies are text files that are placed on your computer to collect standard internet logging information and behavioral information. This information is used to keep track of the visitor behavior of the website and to compile statistical reports about the website.

Most internet browsers are configured to automatically accept cookies. You can however change these settings. The way to do this can differ per browser. You can consult the "help" function of your browser or consult the following website http://www.aboutcookies.org/Default.aspx?page=2

This website uses Google Analytics, a web analytics service offered by Google Inc. Google Analytics uses "cookies" to analyse how visitors use the website.

Cookie	Туре	Description	Retention period
pll_language	Functional cookie	Bijhouden van de taal voorkeur	1 jaar
_ga	Non functional cookie	Google analytics cookie voor bijhouden van statistieken	2 jaar
_gat, _gid	Non functional cookie	Google analytics cookie voor bijhouden van statistieken	1 dag
cfduid	Non functional cookie	This cookie is placed by CloudFlare to identify trustful traffic. More info can be found <u>here</u>	1 jaar

Google Analytics information: Privacy policy - Opt-out

10 WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

10.1 HOW CAN YOU EXERCISE YOUR RIGHTS?

You can exercise your rights by sending an e-mail to info@vanheurck.com. To prevent any unauthorized disclosure of your personal information VAN HEURCK may request more information to verify your identity.

VAN HEURCK has one month to answer your request. This period starts when VAN HEURCK has received your request and has all the information required to fulfill your request.

The one month period can be extended after a message and explanation of VAN HEURCK.

VAN HEURCK will provide the requested information free of charge. If requests are unfounded or excessive, in particular because of their repetitive nature, VAN HEURCK may charge a reasonable fee or VAN HEURCK may refuse the request.

If for any reason you assume that VAN HEURCK did not handle your request correctly, you can contact VAN HEURCK again and we will look for a solution together with you.

For the sake of completeness, we inform you that if VAN HEURCK does not respond to your request, it refuses or if our response does not meet your expectations, you always have the right to file a complaint with the Data Protection Authority (GVA), Drukpersstraat 35, 1000 Brussel, Tel +32 (0)2 274 48 00, or <u>contact@apd-gba.be</u>.

10.2 WHAT ARE YOUR RIGHTS?

Right of access: You can ask us which personal data we process from you, for which we process it, which categories of
personal data we process, with which categories of third parties we share your personal data, the origin of the processed
data and - when application - which logic we use when processing personal data automatically.



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- Right to rectification: If information is not correct, you can ask us to correct it
- Right to delete your data: If data is not processed lawfully or if your data is no longer needed than the purpose for which it was collected, you can ask us to delete your data.
- Right to limit processing: By restricting the processing of your personal data, your personal data can still be kept but its
 use is limited. When you have requested a processing restriction, we may only store your data. This means that no other
 transactions can happen with your data.
- Right to object: You have the right to object to the fact that your data is processed if that processing is based on a general
 interest or the legitimate interest of the person who processes your data. Moreover, you can also exercise this right of
 objection if your personal data are processed for direct marketing purposes. This right of appeal also applies to profiling
 that forms the basis for processing for direct marketing purposes.
- The right to withdraw consent: If the processing of your personal data is based on the basis permission, you have the right to withdraw this permission at any time.
- The right to transfer data: You have the right to obtain your personal data in a standard, structured and machine-readable form and you have the right to transfer this personal data to another controller with the processing based on the data. legal grounds permission or contractual relationship.

