

PRIVACY POLICY

1. General - what is the purpose of this privacy policy?

- 1.1. The website available at the address <http://capyx.be> (hereafter: the 'Website') is operated by and is the property of Capyx SA, with business number 0541 566 044 and with registered office at Square Eugène Plasky 92-94, 1030 Schaerbeek (hereafter: 'Controller', 'we' or 'our').
- 1.2. This privacy policy is intended to provide information about the processing of your personal details on or via the Website. This Privacy Policy is intended to safeguard the proper and transparent processing of your personal data.

We highly recommend that you carefully read this Privacy Policy.

- 1.3. This Privacy Policy is only applicable to the processing of your personal data on or via the Website by the Controller and/or by controllers (e.g. external service providers or subcontractors) which process your personal data on our behalf and which have concluded a controller contract with us in this regard.

This Privacy Policy does not in any way whatsoever cover the privacy policies of other websites or applications to which the Website refers via (permitted) hyperlinks or of companies or entities that advertise our services.

- 1.4. We are responsible for processing your personal data. As the Controller, we take all appropriate technical and organisational measures so that the processing is in compliance with Regulation (EU) 2016/679 of 27 April 2016 (hereafter: 'GDPR'). Our appointees or employees who have access to your personal data are also required to comply with the obligations of the GDPR.
- 1.5. This Privacy Policy can be made available to you electronically and can be viewed at any time under 'Privacy Policy' on the Website. If you have any requests or additional comments, please send an email to info@capyx.be. We shall reply to you with the steps that have been taken in this regard within one month after receipt of your request or question.
- 1.6. The Controller maintains the right to change this Privacy Policy at all times. This privacy policy was last updated on 21/02/2019.

- 1.7. a We must inform you that you must always have express permission from the relevant people before uploading to or placing information on the Website about these people.

2. Who are we and how can you contact us?

Legal form:	SA
Company name:	Capyx
Trade name:	Capyx
Registered office:	0541 566 044

VAT number: BE0541 566 044
Telephone number: 02 880 00 90
E-mail: info@capyx.be
Hyperlink(s) Website: <http://capyx.be>

3. Contact details Data Protection Officer

Isabelle De Prez
Square Eugène Plasky 92-94, 1030 Brussels
02/880 00 90
gdpr@capyx.be

4. For which purposes do we process your personal data?

We process your personal data that was shared on or via the Website solely for:

- Administratie van het personeel en de tussenpersonen
- Beheer van het personeel en de tussenpersonen
- Werkplanning
- Controle op de werkplaats
- Klanten beheer
- Beheer van betwistingen
- Leverancierbeheer
- Verzamelen van giften
- Public relations
- Technisch-commerciële inlichtingen
- Registratie van Aandeelhouders of vennoten
- Ledenadministratie
- Beveiliging
- Beheer van geschillen
- Bescherming van de maatschappij, eigen sector of organisatie

I.g.v. profilering - vermelden en speciëren

5. What are the legal grounds for processing your personal data?

5.1. We process your personal data if:

- The person has given his or her consent to the processing of his or her personal data for one or more specific purposes
- de verwerking is noodzakelijk voor de uitvoering van een overeenkomst waarbij de betrokkene partij is, of om op verzoek van de betrokkene vóór de sluiting van een overeenkomst maatregelen te nemen;
- de verwerking is noodzakelijk om te voldoen aan een wettelijke verplichting die op de verwerkingsverantwoordelijke rust

5.2. In all cases, from the moment that you approve of our privacy policy, by clicking on the button prior to using the Website and/or the processing of personal details on or via the Website, you provide us with free, specific, informed and unambiguous permission to process your personal data and you explicitly consent to the ways in which this is processed, as set forth in this privacy policy.

6. Which personal data do we process?

6.1. On or via the Website, we only process the following personal data if and insofar as you have provided your consent:

- Identification data (name, address, telephone number, ...)
- Electronic identification data (IP-address, cookies, ...)

6.2. Among other things, we process the following data: device data, log file data such as the IP address, browser, and operating system, the external website that brought you to our Website, and the pages that you visit on the Website (and the date and time you visited these pages). This data is automatically (without any sort of registration) only processed for statistical purposes and with a view to further improving the Website.

7. Who receives and/or process your personal data, in addition to the Controller?

Your personal data is also processed on our behalf by, among others, our IT supplier SKINN. This processing is arranged in a controller contract that we have concluded with them.

8. Do we pass your personal data to companies or entities in non-EU countries ?

No.

9. Where, how and for how long do we retain your personal data?

9.1. Your personal data is stored on a secure server OVH.

9.2. We shall not store your personal data for any longer than required to achieve the purposes specified in Article 4. In this context, we could therefore store your personal data for some time. We will store your personal data for a minimum of 5 years

10. What are your rights?

10.1. You have the right to request:

- a review of your personal data;
- improvement (rectification) or removal (deletion) of your personal data;
- a restriction of the processing that relates to you.

10.2. You have the right to appeal against the processing of your personal data. You can object to the processing of your personal data for direct marketing at all times and at no cost.

10.3. You have the right to have your personal data transferred to another controller.

10.4. If the processing of your personal data is based on your permission, you have the right to revoke this permission at all times. However, the revocation of your permission is not retroactive and the lawfulness of the processing based on your permission before the revocation thereof shall remain intact.

10.5. You have the right to submit a complaint to the Privacy Commission/Data Protection Authority.

10.6. The exercise of the aforementioned rights is dependent upon the requirements and conditions as stipulated in the GDPR.

10.7. In order to exercise these rights, you can send a simple request to gdpr@capyx.be, providing adequate proof of your identity.

11 What are our obligations?

- 11.1. We take all the appropriate measures to guarantee the security level that is aligned with the risks for and during the protection of your personal data.
- 11.2. We maintain a processing register in which the (category of) processing of your personal data is described.
- 11.3. [If applicable - We have appointed a Data Protection Officer who informs and advises us concerning our GDPR obligations, who supervises our compliance with the GDPR, and is the point of contact for the authorised privacy authorities.]
- 11.4. We cooperate with the authorised privacy authorities (at their request).
- 11.5. Where necessary and/or required, we shall immediately inform the Privacy Commission/National Data Protection Authority within 72 hours after detection of any security incidents or data leaks (including illegal processing, loss, unavailability, destruction, damage, or unauthorised distribution of your personal data).

We will also inform you under the terms and conditions specified in the GDPR if such a violation appears to entail a high risk for your rights.

If you become aware of a violation in relation to your personal data or that of others, you may contact us on the email address gdpr@capyx.be.

- 11.6. If we use new technologies or applications in order to process your personal data, which could correspond to high risks in relation to your data protection, we will conduct a so-called 'Data Protection Impact Assessment' (DPIA) under the conditions of GDPR and, if necessary, consult the Privacy Commission/Data Protection Authority in advance.

12. Cookies

- 12.1. The Website uses 'cookies' with a view to improving the user experience and for the collection of Website visitor statistics. Cookies are small data files that are saved by the browser on your computer when you visit a website and which facilitate the interaction between the visitor and the Website. Cookies do not contain any personal data.
- 12.2. From the moment that you approve our privacy policy, including our cookie policy, by ticking 'ok' prior to using the Website, you provide us with free, specific, informed and unambiguous permission to use cookies on the Website

The following types of cookies are used on the Website:

- i. Temporary cookies: these cookies are deleted once your browser closes and are vital for enabling you to navigate the Website..
 - ii. A Permanent cookies: these cookies are used to pass information to the webserver <https://policies.google.com/privacy?hl=nl> when somebody visits the website and remain stored on your computer. These cookies are activated each time you visit the Website.
 - iii. Functional cookies: these cookies are used in order to ensure the Website functions effectively.
 - iv. Non-functional cookies: these cookies can be used for more statistical purposes, among other things.
- 12.3. You have the right to object to the previously permitted use of the aforementioned cookies upon request and at no charge. You can submit this request at any time to gdpr@capyx.be
 - 12.4. The Website uses Google Analytics, a web analytics service provided by Google Inc. ('Google'). Google Analytics uses cookies in order to help the Website analyse how users use the site. The information generated by the cookie about your use of the Website (including your IP address) is transmitted to Google and is stored by it on servers in the United States. Google uses this information to track how you use the Website, to compile reports on website activity for the benefit of website operators, and to offer other services relating to website activity and Internet usage. Google may also provide this

information to third parties if Google is legally mandated to do so, or where such third parties process the information on Google's behalf. Google will not combine your IP address with other data it has in its possession.

- 12.5. The use of cookies can be deactivated via your computer or another device (your web browser settings). However, it is possible that the Website will no longer function correctly.

Questions? Feel free to contact us: gdpr@capyx.be