

PRIVACY NOTICE CONCERNING THE PROTECTION OF THE PERSONAL DATA OF WEBSITE VISITORS

ORIZIO understands the importance of personal data. This Privacy Notice (hereinafter referred to as “the Notice”) describes how the personal data collected through our website www.ORIZIOgroup.com and by signing up for news alerts are handled and processed.

In this Notice:

“**ORIZIO**” refers to ORIZIO, Avenue Emmanuel Mounier 2, B-1200 Brussels (Belgium).

“**Data controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the processing purposes and means.

“**Subcontractor**” means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.

“**Personal data**” means any information relating to a natural person who can be identified or is identifiable directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data or online identifier (...);

1. Scope

The website www.ORIZIOgroup.be is managed by ORIZIO. It is important for us to create and maintain an environment in which visitors feel comfortable that their information will not be misused.

Pursuant to the applicable personal data protection legislation, including the General Data Protection Regulation 2016/679 and the relevant national legislation, ORIZIO wants to explain to you which data we collect about you and how they will be used when you browse our website and when you sign up for “news alerts”, but also to assure you that they will be properly processed.

2. Personal data collected

2.1. When you visit our website, we collect the following personal data:

- IP address, and
- cookies

We use “cookies” (and similar technologies) on our websites and applications. These small files that store information on your computer’s browser enable us to remember certain information about you (e.g. choice of language).

We store them in order to adapt our sites and applications to your needs and to keep your preferences for future visits. In this way, we can quickly improve your ease of use and offer you relevant services.

2.2. To sign up for the “About ORIZIO” news alert, ORIZIO may collect and process the following categories of personal data about you:

- surname, first name, title;

- address;
- contact details (email, telephone number, fax);
- company;
- choice of language.

2.3. You may also decide to provide additional/optional information when you fill in the form on our website or when we get in touch with you (by phone, e-mail or at trade fairs or events).

2.4. ORIZIO may also collect publicly accessible information in order to verify the information we have collected and to manage and expand our business.

3. Why do we collect information?

ORIZIO collects the aforementioned information for the following purposes:

3.1. Information and communication

We may use your personal data to inform you about our activities, services or news alerts, or to contact you if you have asked us a question.

We also collect your data to provide you with information about the company, including financial and company law information (Annual Report, etc.), as well as to comply with legal, regulatory and compliance obligations and requirements.

3.2. Website security

Due to our legitimate interest in securing our website, we collect and process your IP address.

3.3. Use of cookies

When you browse our website, we install “cookies”:

- which are necessary for the proper functioning of our website, on the basis of our legitimate interest in providing you with a functioning website, and
- for the purpose of analysing your browsing behaviour on our website, but only if you have given your prior consent.

If you would like more information about our use of cookies, their retention period, etc., please refer to our [Cookie policy](#).

3.4. Use of social media

In order to increase our visibility on the Internet and ensure proximity to our current and future customers, we also have a presence on social media such as Facebook, LinkedIn and YouTube.

By visiting these sites, you can choose to share some of your personal data with us directly by contacting us, commenting on and/or sharing our posts.

In addition, we recommend that you read the privacy Notice posted by these third parties on their sites in order to find out how your personal data are processed by these third parties in their capacity as data controllers.

4. Legal basis for processing personal data

We are only authorised to use and process your personal data if one of the following conditions is met:

- The use of your personal data is necessary for the performance of a contract you have entered into with us or to take the necessary measures to enter into this contract at your request.
- We have your free and explicit consent to use your personal data for a specific purpose.

For example, by signing up to “About ORIZIO” news alerts and sharing your personal data, you are giving us your consent to process your personal data as described in this Notice. Insofar as we process personal data based on your consent, we would inform you that you have the right to withdraw your consent at any time by contacting us (see below).

- Your personal data are used in line with our legitimate interests and in accordance with your interests and rights (collecting and saving your IP address in order to secure our website).
- We are legally required to process and communicate certain data to the competent authorities, such as the data protection authority.

5. How will your information be used and shared?

5.1. In general, your data will only be processed by the competent department within ORIZIO. If necessary, ORIZIO may share your personal data with group companies.

5.2. For technical purposes, we may also share your personal data with third parties performing tasks on our behalf and providing services, such as professional advisors or IT consultants performing tests and development work on our business technology systems.

5.3. Insofar as ORIZIO has to comply with its legal obligations or in the interests of security, the public interest or the application of the law, we may have to disclose your personal data. We may also disclose data in connection with current or potential disputes or to protect our assets, our security, our staff and other rights or interests.

5.4. Your personal data will not be sold or leased to third parties.

6. Place of data retention and processing

Personal data will not in principle be transferred outside the EU. If it is nevertheless planned to retain and/or process them outside the EU, we will notify you explicitly and ensure that the same level of protection is guaranteed.

If we use subcontractors, the data will be transmitted to the countries where the data centres of these subcontractors are located.

We enter into an agreement with these subcontractors based on a model approved by the European Commission whereby these subcontractors guarantee the same level of protection as that guaranteed by ORIZIO for data stored within the EU.

7. Personal data retention period

We will only retain your information to the extent necessary to achieve the objectives specified in point 3 of this Notice.

Given that the need to retain data depends on the type of data and the purpose of the processing, retention periods may vary considerably. Here are the criteria we go by to determine retention periods:

- How long do we need the data to provide the service requested?
- Have we established and announced a specific retention period?
- Have we obtained consent to extend the retention period?
- Are we subject to a legal, contractual or other obligation?

As soon as we no longer need your data and are no longer legally required to retain them, we permanently delete them or, if this is not possible, we anonymise them in our system.

In principle, your personal data will be retained and used for as long as necessary to comply with our legal obligations, or to settle disputes or enter into contracts.

Personal data processed for the subscription to the e-mail alerts will be retained until you exercise your right of erasure (*see below*) or will be retained for a maximum of 3 years if no exchange will have been established. Please note that this withdrawal will have effect only for the future.

8. Data security

Your data are considered to be strictly personal. To this end, we have taken all the appropriate technical and organisational measures to protect them from any accidental destruction, loss or alteration as well as from any damage, accidental or unlawful access or other unwarranted data processing.

9. Rights of data subjects

9.1. You have certain rights relating to the personal data we hold about you:

- **Right to be informed:** You have the right to be informed, no later than when your data are collected, about the processing we carry out, your rights relating thereto and the exercise of these rights. This being the case, we have drawn up this Notice.
- **Right of access:** You have the right to view the information concerning you and to obtain a copy of the information we hold.
- **Right of rectification:** If your personal data have changed, you may ask us to rectify, supplement or delete any out-of-date, incorrect or incomplete data we hold about you.
- **Right of erasure:** Under certain circumstances, you have the right to have the personal data that we hold about you erased, for example where such personal data are no longer necessary for the purposes for which they were collected or where you have withdrawn your consent and there is no other legal basis for the processing.
- **Right of objection and restriction:** In addition, under certain circumstances you have the right to restrict the processing of your data and to object to the processing of your personal data.
- **Right of portability:** You also have the right to receive the personal data about you that you have provided to SABCA and to transfer them to another data controller.

9.2. We may ask you to provide proof of your identity to ensure that you have a legitimate right to make a request and to check that we are responding to the person who has the legitimate right to send us one of the aforementioned requests and to obtain the information.

Please note that in certain circumstances provided for by law, we may deny access to your information or not accept your request where we are permitted to do so by applicable data protection legislation.

9.3. If you would like further information about the processing of your personal data or if you want to exercise your rights, please contact us using the following e-mail address: dataprotectionofficer@sabca.be.

9.4. You have the right to file a complaint with the Belgian Data Protection Authority, Rue de la Presse, 35, B-1000 Brussels, T: +32 (0)2 274 48 00; F: +35 (35)2 274 48 35; [E: contact@apd-gba.be](mailto:contact@apd-gba.be).

10. Exercising your rights

10.1. How to exercise your rights

To exercise the aforementioned rights, send us a written, signed and dated request as well as proof of your identity (e.g. photocopy of your identity card, etc.):

- By e-mail: dataprotectionofficer@sabca.be.
- By post to the following address:
Avenue Emmanuel Mounier 2, B-1200 Brussels (Belgium).

We ask that you clearly state the right you want to invoke, which processing you wish to object to or restrict, or which consent you wish to withdraw.

10.2. Conditions for exercising your rights

When you exercise your rights, you will not be charged unless we consider it to be a patently unfounded or excessive request (this will be the case, for example, if it is a repeated request). However, we may ask you to pay a reasonable sum not exceeding our copying costs for any request for an additional copy.

For any request relating to your rights as explained in point 9 of this Notice, we will respond to your request within one month. Nevertheless, this period may be extended to two months if the request proves to be complex and/or due to the number of requests that we have to deal with. If this period is extended, we will inform you of this by telling you the reason for this decision.

11. Amendment of this Notice

We reserve the right to amend or supplement this Notice if necessary.

In the event of significant amendments, the amendment date will be updated and a copy of the new Notice will be posted on our website www.oriziogroup.be

We encourage you to review this Notice periodically to learn how we process and protect your data.