



## PRIVACY POLICY

### 1. WHO WE ARE

“We”, “us” or “our” means Rekupp nv, with its registered office at Duboisstraat 50, 2060 Antwerp, Belgium and with company number BE 0438 171 467. We act as a controller for the personal data we gather through your use of our website.

This Privacy Policy is solely intended to provide you with information concerning the processing of personal data through your use of the website. For our privacy practices concerning our services, we refer you to the agreement as may be concluded between us.

Your privacy is important to us, so we’ve developed this Privacy Policy that sets out how we collect, disclose, transfer and use (“process”) the personal data that you share with us, and which rights you have. Please take a moment to read through this policy.

If you have any questions, concerns or complaints regarding this Privacy Policy or our processing of your data or you wish to submit a request to exercise your rights as set out in article 4, you can contact us:

- (a) Via-mail: [IT@remant.be](mailto:IT@remant.be);
- (b) By post: Duboisstraat 50, 2060 Antwerp, Belgium

This Privacy Policy was revised last on 25/05/2021.

### 2. HOW WE USE AND COLLECT YOUR PERSONAL DATA

Personal data is defined as any information relating to an identified or identifiable natural person. Identifiable refers to identifiers (such as name, identification number, location data, etc.), that can be used to directly or indirectly identify a natural person.

The personal data we collect is collected and used for the purposes as listed hereunder:

- (a) In the event you use the contact form on our website, we will use your personal data to reply to your query, via e-mail or telephone.
- (b) In the event you use the vacancy form on our website, we will use your personal data to reply to your application, via e-mail or telephone.
- (c) In the event you provide us with transaction data through our track & trace systems, we collect your personal information to save such information, to provide you with our services and permit us to send you your orders or to contact you.

- (d) We process your personal data to support the website and enhance your user experience, which includes ensuring the security, availability, performance, capacity and health of the website.
- (e) We process your personal data to enforce or exercise any rights that are available to us based on the applicable law, such as use for the establishment, exercise or defence of legal claims.
- (f) We may also use your personal data to fulfil our obligations as set out by the applicable law.

The following categories of personal data can be distinguished:

- (a) **Contact data:** in the event, you make use of the contact form, you will be asked to provide the following information: first name, last name, e-mail address, and any personal data that you choose to put in the designated blank field (please do not provide us with any sensitive information, such as health information, information on criminal convictions, or credit card/account numbers). This is information that is provided directly by you.
- (b) **Personal data:** in the event, you make use of the vacancy form, you will be asked to provide the following information: first name, last name, e-mail address, curriculum vitae and/or motivation letter, and any personal data that you choose to put in the designated blank field (please do not provide us with any sensitive information, such as health information, information about criminal convictions, or credit card/account numbers). This is information that is provided directly by you.

The legal basis for the processing of your personal data is to facilitate the recruitment selection and employment process.

- (c) **Usage data:** We collect personal data regarding your activities on our website: IP address, device ID and type, referral source, language settings, browser type, operating system, geographical location, length of visit, page views, or information about the timing, frequency and pattern of your service use. This information may be aggregated and used to help us provide more useful information regarding the use of our website. In the event, the usage data is completely anonymized (and can therefore not be traced back to you as an individual), this will not be considered personal data for this Privacy Policy. This is personal data that is automatically collected through your use of the website.

In the event the legal basis for the processing of your personal data is consent, you will, at all times, have the right to withdraw your consent. This will, however, not affect the lawfulness of any processing done before the withdrawal of consent.

Your personal data will solely be used for the purposes as set out in this article.

### 3. RETENTION OF YOUR DATA AND DELETION

Your personal data will be retained for a period of maximum of 2 years and will not be kept for longer than is necessary for a specific purpose.

In the event you withdraw your consent, or you object to our use of your personal data, and such objection is successful, we will remove your personal data from our databases. Please note that we will retain the personal data necessary to ensure your preferences are respected in the future.

The foregoing will, however, not prevent us from retaining any personal data if this is necessary to comply with our legal obligations, to file a legal claim or defend ourselves against a legal claim, or for evidential purposes.

### 4. YOUR RIGHTS

This article lists your principal rights under data protection law. We have tried to summarize them for you clearly and legibly.

To exercise any of your rights, please send us a written request following article 1 of this Privacy Policy. We will respond to your request without undue delay, but in any event within one month of the receipt of the request. In the event of an extension of the term to respond or in the event we do not take action on your request, we will notify you.

#### ***The right to access***

You have the right to confirmation as to whether or not we process your personal data and, in the event, we do so, you have the right to access such personal data, together with certain additional information that you also find listed in this Privacy Policy.

You have the right to receive from us a copy of your personal data we have in our possession, provided that this does not adversely affect the rights and freedoms of others. The first copy will be provided free of charge, but we reserve the right to charge a reasonable fee if you request further copies.

#### ***The right to rectification***

If the personal data we hold about you is inaccurate or incomplete, you have the right to have this information rectified or, taking into account the purposes of the processing, completed.

#### ***The right to erasure (right to be forgotten)***

In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- (a) The personal data are no longer needed concerning the purposes for which they were collected or otherwise processed;

- (b) You withdraw your consent, and no other lawful ground exists;
- (c) The personal data have been unlawfully processed; or,
- (d) Erasure is necessary for compliance with EU law or Belgian law.

There are certain exclusions to the right to erasure. Those exclusions include where processing is necessary,

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation; or,
- (c) for the establishment, exercise or defence of legal claims.

#### ***The right to restrict processing;***

You have the right to restrict the processing of your personal data (meaning that the personal data may only be stored by us and may only be used for limited purposes), if:

- (a) You contest the accuracy of the personal data (and only for as long as it takes to verify that accuracy);
- (b) The processing is unlawful and you request restriction (as opposed to exercising the right to erasure);
- (c) We no longer need the personal data for our processing, but you require personal data for the establishment, exercise or defence of legal claims; or,
- (d) You have objected to processing, pending the verification of that objection.

In addition to our right to store your personal data, we may still otherwise process it but only:

- (a) with your consent;
- (b) for the establishment, exercise or defence of legal claims;
- (c) for the protection of the rights of another natural or legal person; or,
- (d) for reasons of important public interest.

We will inform you before we lift the restriction of the processing.

#### ***The right to data portability***

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

You also have the right to have your personal data transferred directly to another company, if this is technically possible, and/or to store your personal data for further personal use on a private device.

### ***The right to object to processing***

You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- (a) The performance of a task carried out in the public interest or the exercise of any official authority vested in us;
- (b) The purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

### ***The right to complain to a supervisory authority***

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to complain about a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. In Belgium, you can submit a complaint to the Authority for the protection of personal data (Privacy Commission), Drukpersstraat 35, 1000 Brussel

[commission@privacycommission.be](mailto:commission@privacycommission.be)

<https://www.gegevensbeschermingsautoriteit.be/burger/acties/contact>

#### **5. INTERNATIONAL TRANSFERS**

We will not transfer your personal data outside of the European Economic Area

#### **6. COOKIES**

Our website makes use of cookies. For further information relating to our use of cookies, we refer you to our Cookie Policy:

<https://rekupp.be/assets/files/2021%20Rekupp%20website%20cookies.pdf>.

#### **7. AMENDMENTS TO THE PRIVACY POLICY**

From time to time, we have the right to modify this Privacy Policy. You will always be able to consult the most recent version of the Privacy Policy on the website.