

PRIVACY POLICY

1. Introduction

This privacy policy applies to all data that is collected and used by S.P.R.L. COMPANYWRITERS.BE, with the Belgian BCE number 0884.562.301 and head office located at 4600 VISE, Rue Basse-Hermalle 25/8, Belgium. The manager of this company is Mme Bernadette PÂQUES.

2. Definitions

Personal data: Any information relating to an identified or identifiable natural person (hereinafter referred to as “data subject”). Any natural person shall be deemed to be an “identifiable natural person” who can be identified, directly or indirectly, in particular by reference to an identifying element such as a name, an identification number, location data, an online identifier, or by one or more specific elements proper to his physical, physiological, genetic, psychic, economic, cultural or social identity.

Sensitive data: Personal data related to sensitive aspects such as racial or ethnic identity, political opinions, religion or any other belief, health or any medical condition, criminal history, trade union membership or sexual orientation. Sensitive data may be processed with the consent of the data subject. If the data subject communicates sensitive data, he/she thereby consents to the data processing controller’s processing of such data.

Customer: The natural or legal person who places an order with the data processing controller or who has access to his/her customer area on the site <https://www.companywriters.be/>.

Provider: A natural or legal person who usually provides certain products and services to the data processing controller.

Internet user: The natural or legal person who visits the web page <https://www.companywriters.be/> or who completes the contact form;

Privacy policy: This policy which concerns the protection of personal data.

Prospective customer: A person who could potentially become a new customer, that is, a person that the data processing controller seeks to reach in order to generate sales.

Data processing controller: S.P.R.L. COMPANYWRITERS.BE, the legal entity that determines the purposes and means of the processing.

Subcontractor: The natural or legal person, public authority, service or other body that processes personal data on behalf of the data processing controller.

Processing: Any operation or set of operations, whether or not they be performed using automated processes, applied to personal data or sets of personal data, such as collection, registration, organisation, structuring, storing, adapting or modifying, extracting, consulting, using, communicating by transmission, dissemination or any other form of provision, grouping or interconnection, limitation, deletion or destruction.

3. What information is collected?

3.1. Internet users

The first information collected via the **contact form** on the site <https://companywriters.be> is as follows:

- Personal identification data:
 - o Surname;
 - o First name;
 - o Company (not mandatory);
 - o Telephone number (not mandatory);
 - o E-mail;

- Any personal data that may be contained in the documents attached to the contact form.

The following data may also be collected:

- Electronic identification data:
 - o Location;
 - o IP address assigned during login;
 - o Connection time;
 - o Pages viewed;
 - o Type of browser used;
 - o Platform and / or operating system installed and used;
 - o Device used to connect (computer, tablet, smartphone etc.);
 - o Search engine and keywords used to access the website.

In the case of subscription to the **Newsletter**, the following data are used:

- Personal identification data:
 - o E-mail address.

3.2. Prospective customers

The database used for the **management of prospective customers and / or the Newsletter** contains:

- Personal identification data:
 - o Surname;
 - o First name;
 - o E-mail address;
 - o Other;

- Lifestyle;
- Media use.

3.3. Customers

In the event that a contract is concluded between the S.P.R.L. COMPANYWRITERS.BE and the data subject, the bank details of the data subject shall be added to the list of personal data held by the S.P.R.L. COMPANYWRITERS.BE. Any personal data contained in the documents sent for translation as part of the execution of the contract shall also be added.

3.4. Providers

For good management of relations with the providers and payment of their invoices, the following data are used:

- Contact person's identification data:
 - o Surname;
 - o First name;
 - o E-mail address;
 - o Telephone number;
 - o Position;
- Assessment;
- Financial data;
- Location.

4. Who collects the data?

The data are collected by the data processing controller, namely, the S.P.R.L. COMPANYWRITERS.BE.

The data may also be collected via the web host, the S.A. VOX TENEO, Belgian BCE number 0477.390.844, with head office at Rue Léon Deladrière, 15, 1300 WAVRE, Belgium.

The data are then passed on to the data processing controller.

5. How are the data collected?

The data are collected during exchanges with the data processing controller, face to face, or by telephone, e-mail or fax.

Data are also collected via the contact form on the site <https://www.companywriters.be>, completed by the data subject. Data may also be collected via cookies (see the specific information about the latter).

6. Why do we collect your data?

Data are collected mainly in order to execute the contract properly.

In particular, data may be used for:

- management of providers and contracts;
- management of customers and contracts;
- marketing by the data processing controller.

They may also be used in order to:

- respond to requests for information and ensure their follow-up;
- supply information about any changes in the services offered and / or the applicable texts (such as the general terms and conditions or the privacy policy).

Data are also collected to meet legal requirements, including accounting, to comply with a court order, respond to a request from public authorities, protect the interests of the data processing controller as well as those of its partners and its customers and to protect its services, enforce the terms and conditions, the privacy policy and any applicable text, make any recourse or limit any prejudice that the data processing controller may suffer.

7. With whom will the data be shared?

It is possible that data may be communicated to third parties in direct relation with the data processing controller, when necessary and in particular to the entities listed below:

- A. service providers chosen by the data processing controller, who are in charge of web hosting, provision of infrastructure, IT services, e-mail services, audit services and all other similar services to enable them to provide these services;
- B. commercial partners for marketing purposes;
- C. a potential buyer, in case of total or partial transfer of the activities of the data processing controller (merger, sale, transfer of assets, judicial reorganisation etc.);
- D. in the event of a dispute, the data may be forwarded to a third party in charge of litigation management (law firm, debt collection company etc.), which will also ensure compliance with applicable legislation regarding this information;
- E. accountant, public authority, social secretariat etc., in order to respect the legal obligations of the data processing controller (communication of data to his/her accountant, response to a request from the public authorities, compliance with a court order etc.).

The list of these providers can be communicated on request.

8. How do we ensure data security?

Appropriate technical and organisational measures have been put in place to ensure a level of security corresponding to the risk including, inter alia, as may be required:

- ways to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- means to restore the availability of and access to personal data in good time in the event of a physical or technical incident.

The details of these security measures can be communicated on request.

9. How long do we keep the data?

The S.P.R.L. COMPANYWRITERS.BE keeps data as long as required by its legal and contractual obligations.

A. The following data are kept for 3 months:

Procedure	Duration	Basis
Translated documents	3 months after sending these documents to the data subject	Policy established by the S.P.R.L. COMPANYWRITERS.BE

B. The following data are kept for 7 years:

Procedure	Duration	Basis
Management of invoices and expense reports	7 years as from 1 January of the year following the end of the financial year	Article III.86 of the Belgian Code de Droit Economique (CDE – Code of Economic Law)

C. The following data are kept for a certain period following a specific event:

Procedure	Duration	Basis
Management of customer data sheets	3 years after the execution of the last services for the customer (or after the expiry of a possible guarantee period if the latter is longer)	Policy established by the S.P.R.L. COMPANYWRITERS.BE
Management of provider data sheets	3 years after the execution of the last services by the provider in question (or	Policy established by the S.P.R.L. COMPANYWRITERS.BE

	after the expiry of a possible guarantee period if the latter is longer)	
Sending a newsletter	10 years after the last newsletter sent to prospective customers	Policy established by the S.P.R.L. COMPANYWRITERS.BE
Customer management	10 years after the expiry date of the contract in order to guarantee the rights of the company regarding possible legal action	Article 2262bis of the Belgian Civil Code
Contact form	10 years after the date on which the message was sent in order to guarantee the rights of the company regarding possible legal action	Article 2262bis of the Belgian Code
Management of the prospective customers database	10 years since the last interaction with the prospective customer in question	Policy established by the S.P.R.L. COMPANYWRITERS.BE

10. What rights do you have?

A. Right to information

Every data subject has a right to information concerning the data collected. In particular, it is through this privacy policy that the S.P.R.L. COMPANYWRITERS.BE wants provide this.

B. Right to access

Every data subject has the right to access his/her personal data.

To do this, the data subject must make a request to the data processing controller so that the latter can give him/her details of the data it holds about him/her, subject to the rights and freedoms of others that must not be infringed.

An answer must be given within one month following the request made by the data subject. However, this period may be extended by one additional month depending on the complexity and the number of requests. In the latter case, the data subject shall be informed within one month of applying for the right to access.

The data processing controller shall be entitled to demand payment of “reasonable expenses” to cover the administrative costs borne in order to issue these documents in the event that this request is excessively recurrent, unjustified or clearly intended to abuse this right to access.

C. Right of rectification

The data subject shall have the right to obtain from the S.P.R.L. COMPANYWRITERS.BE, as soon as possible, the rectification of his/her personal data that are inaccurate.

The data subject may also request that his/her incomplete data be completed, particularly by supplying a supplementary declaration.

The S.P.R.L. COMPANYWRITERS.BE shall notify the data subject of the completion of this operation.

D. Right to deletion

The data subject may demand the right of deletion of his/her data for any of the following reasons:

- the data are no longer necessary for the purposes for which they were collected or processed by the data processing controller;
- the data subject wishes to withdraw his/her consent and there is no other legal basis for this processing;
- the data have been processed unlawfully;
- the data must be deleted pursuant to a legal obligation in European Community law or the law of the Member State to which the data processing controller is subject.

In response to such a request, S.P.R.L. COMPANYWRITERS.BE shall take reasonable steps to delete such data within the month following the request.

The S.P.R.L. COMPANYWRITERS.BE shall notify the data subject of the completion of this operation.

In the event that S.P.R.L. COMPANYWRITERS.BE does not wish to grant this request, reasons for its refusal shall be justified.

The right to deletion shall not apply insofar as the processing of these data is necessary:

- for the exercise of the right to freedom of expression and information;
- to comply with a legal obligation that requires the processing provided by the law of the European Union or by the law of the Member State to which the data processing controller is subject, or in order to carry out a task that is in the public

interest or that derives from the exercise of public authority conferred upon the data processing controller;

- to ascertain, exercise or defend rights in court.

E. The right to limit processing

The data subject shall have the right to obtain from the S.P.R.L. COMPANYWRITERS.BE the limitation of the processing in any of the following cases:

- the accuracy of the personal data is disputed by the data subject, for a period of time allowing the S.P.R.L. COMPANYWRITERS.BE to verify the accuracy of these personal data;
- the processing is unlawful and the data subject objects to the deletion of his/her data and instead requires limitation of their use;
- the data processing controller no longer needs these personal data for processing purposes, but they are still necessary for the data subject to ascertain, exercise or defend rights in court;
- the data subject has objected to the processing by virtue of his/her right of objection, during the verification process as to whether the legitimate grounds pursued by the S.P.R.L. COMPANYWRITERS.BE override those of the data subject.

This request for limitation shall imply that the personal data may, with the exception of retention, be processed only with the consent of the data subject, or in order to ascertain, exercise or defend rights in court, or for the protection of the rights of another natural or legal person, or for important reasons of public interest of the European Union or of a Member State.

The S.P.R.L. COMPANYWRITERS.BE shall notify the data subject of the completion of this operation.

F. Right to portability

If the processing of the personal data of the data subject is based on the consent given by the latter, or on a contract, and if such processing is performed with the help of automated procedures, the data subject may ask to receive these data in a structured format that is commonly used and machine readable.

The data subject may transmit these data to another data processing controller, without the S.P.R.L. COMPANYWRITERS.BE being able to obstruct the same.

G. Right of objection

The data subject shall have the right to object at any time, for reasons relating to his/her particular situation, to the processing of his/her personal data based on the public interest

or the legitimate interest of the S.P.R.L. COMPANYWRITERS.BE, including profiling based on these interests.

The S.P.R.L. COMPANYWRITERS.BE shall no longer process such data unless it demonstrates that there are legitimate and compelling reasons for such processing that prevail over the interests and rights and freedoms of the data subject, or for the ascertainment, exercise or defence of rights in court.

11. How can you claim your rights?

Your request can be filed internally with Mme Bernadette PÂQUES via the email address bpa@companywriters.be or by post to the company office.

In the event that you are not satisfied by the follow-up given to your complaint, you can always exercise one of the rights provided for above, or file a complaint with the Data Protection Authority.

You can contact it in the following ways:

- by telephone: (+32) (0)2 274 48 00;
- e-mail: commission@privacycommission.be;
- on-line contact form at: <https://www.privacycommission.be/en/contact-form>;
- by post: Commission de la protection de la vie privée (Belgian Privacy Commission), Rue de la Presse 35, 1000 Brussels, Belgium;
- fax: (+32) (0)2 274 48 35.