

## **DATA PROTECTION NOTICE**

### **1. INTRODUCTION**

Arthur Vandendorpe NV, with registered office at Molendamstraat 4, B-8210 Zedelgem and registered with the Crossroads Bank for Enterprises with company number BE0417.029.625 (hereinafter the “**Company**”), sets great store by the safe, transparent and confidential collection and processing of your personal data. In particular, we want to protect the data of, among others, our customers, subcontractors and suppliers against loss, leaks, errors, unauthorised access or unlawful processing.

We want to inform you about the collection and processing of your personal data by means of this Data Protection Notice.

We ask you to read this Data Protection Notice carefully, as it contains essential information about the way your personal data are processed and for what purpose.

By communicating your personal data, you expressly declare that you have read and expressly agree to this Data Protection Notice, as well as to the processing itself.

### **2. SCOPE**

This Data Protection Notice covers all services provided by us and, in general, all activities we carry out.

### **3. CONTROLLER AND ITS COMMITMENTS**

The Company is the controller of your personal data.

When collecting and processing your personal data, we shall comply with Belgian data protection regulations as well as the General Data Protection Regulation (GDPR) as of its entry into force on 25 May 2018.

### **4. PERSONAL DATA**

Depending on your activities and your relationship with our company, you will provide us with the following personal information: your identity and contact details (name,

title, address, e-mail address, telephone and mobile phone number). For certain specific legal obligations (electronic attendance registration, 30bis declaration of works), you may provide us with additional data to register your presences (such as E-ID data, Limosa number).

We remind you that you are responsible for all the data you provide to us and that we rely on their accuracy. If your data are no longer up to date, please inform us immediately.

You are not obliged to provide us with your personal data, but you must realise that it becomes impossible to provide certain services or collaborate if you do not consent to their collection and processing.

## **5. PROCESSING PURPOSES AND LEGAL BASIS**

### **5.1 Customer data**

As part of our services and activities, we collect and process the identity and contact details of our customers and clients, their staff, employees, appointees and other useful contacts. We process these data with a view to executing agreements with our customers, customer management, accounting and direct marketing activities, such as sending commercial information. The legal grounds are the execution of the contract, the fulfilment of legal and regulatory obligations (such as, for example, the 30bis declaration of works) and/or our legitimate interest.

### **5.2 Data of suppliers and subcontractors**

We collect and process the identity and contact details of our suppliers and subcontractors, as well as any (sub)subcontractor(s), their personnel, employees, appointees and other useful contacts. We process these data with a view to executing this agreement, managing suppliers/subcontractors, accounting and direct marketing activities, including sending commercial information. The legal grounds are the execution of the agreement, the fulfilment of legal and regulatory obligations (such as the mandatory electronic attendance registration, the 30bis declaration of works, the attendance list or other obligations in public procurement, etc.) and/or our legitimate interest (such as for direct marketing). For the electronic attendance registration, the E-ID data or the Limosa number shall also be processed where applicable. For direct marketing activities by e-mail (such as a newsletter or invitation to events), permission will always be requested and can also be withdrawn at any time.

### **5.3 Personnel data**

We process the personal data of our employees and service providers in

the framework of our personnel management and payroll and remuneration administration. Given its specific nature, this processing is more comprehensively regulated in a Staff Data Protection Policy.

#### 5.4 Other data

In addition to the data of customers, suppliers/subcontractors and personnel, we also process personal data of other third parties, such as possible new customers/prospects, useful contacts within our industry, network contacts, expert contacts, etc. We process these data in the interest of our activities, direct marketing and public relations. The legal basis is our legitimate interest or, in some cases, the execution of a contract.

### 6. DURATION OF PROCESSING

The personal data will be stored and processed by us for a period of time that is commensurate with the purposes of the processing and depending on the (contractual or non-contractual) relationship we have with you.

Customer data and data of suppliers or subcontractors will in any case be deleted from our systems after a period of ten years after the termination of the contract or project, except for these personal data which we are required to retain for a longer period on the basis of specific legislation or in the event of an ongoing dispute for which the personal data are still necessary.

### 7. RIGHTS

In accordance with, and subject to, the conditions of Belgian privacy law and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- Right of access and inspection: you have the right to inspect, free of charge, the data that we hold about you and to check what use is made of these.
- Right of rectification: you have the right to have incorrect personal data rectified (corrected), and have incomplete personal data completed.
- Right of data deletion or limitation: you have the right to request us to delete your personal data or limit the processing thereof in the circumstances and under the conditions defined by the General Data Protection Regulation. We may refuse to delete or limit any personal data which are necessary for us to fulfil a legal obligation, execute the contract, or our

legitimate interest, as long as these data are necessary for the purposes for which they were collected.

- Right to data transfer: you have the right to obtain the personal data you have provided us with in a structured, common and machine-readable form. You have the right to transfer these data to another data controller.
- Right of objection: you have the right to object to your personal data being processed for serious and legitimate reasons. Please note, however, that you cannot object to personal data being processed that are necessary for us to fulfil a legal obligation, execute the contract or in our legitimate interest, and this for as long as these data are necessary for the purposes for which they were collected.
- Right of withdrawal of consent: If the processing of personal data is based on prior consent, you have the right to revoke this consent. These personal data will then only be processed if we have another legal basis for doing so.
- Automatic decisions and profiling: we confirm that the processing of personal data does not include profiling and that you will not be subjected to fully automated decisions.

You can exercise the aforementioned rights by sending a request to the company either by letter for the attention of Ms Natalie Verheyden or by email to the following email address: [nve@vanlaere.be](mailto:nve@vanlaere.be).

We make every effort to handle your personal data in a careful and legitimate manner in accordance with applicable regulations.

## **8. TRANSFER TO THIRD PARTIES**

Certain personal data collected by us will be transferred to, and possibly processed by, third-party service providers, such as our IT supplier, accountant, auditor, as well as by the government (e.g. in the 30bis declaration of works, electronic attendance registration or the competition for public contracts).

It is possible that one or more of the aforementioned third parties may be located outside the European Economic Area ("EEA"). However, only personal data will be transferred to third countries with an adequate level of protection.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialist service providers appointed by them must respect the confidential nature of your personal data and may only use these data for the purposes for which they were provided.

If necessary, your personal data may be passed on to other third parties. This may be the case, for example, if the Company were to be reorganised in whole or in part, if its activities were to be transferred or if it were to be declared bankrupt. It is also possible that personal data may have to be transmitted pursuant to a court order or in order to comply with a certain legal obligation. In that case, we will make reasonable efforts to inform you in advance of this communication to other third parties. However, you will understand that in certain circumstances, this may not always be technically or commercially feasible or that legal restrictions may apply.

Under no circumstances will we sell or make your personal data commercially available to direct marketing agencies or similar service providers, except with your prior consent.

## **9. TECHNICAL AND ORGANISATIONAL MEASURES**

We take the necessary technical and organisational measures to process your personal data to an adequate level of security and to protect them against destruction, loss, falsification, alteration, unauthorised access or accidental notification to third parties, as well as any other unauthorised processing of these data.

Under no circumstances shall the Company be held liable for any direct or indirect damage resulting from the erroneous or unlawful use of personal data by a third party.

## **10. THIRD-PARTY ACCESS**

For the purpose of processing your personal data, we provide our employees, collaborators and appointees access to your personal data. We guarantee a similar level of protection by making contractual obligations similar to this Data Protection Notice legally binding on these employees, collaborators and appointees.