
PRIVACY POLICY

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1. WHO ARE WE

We are Buysse & Partners Holding NV residing at Jan van Rijswijcklaan 162/1 2020 Antwerpen Belgium with company registration number BE 0636 780 056 .

We care about your privacy and every time we deal with your personal data we do so in accordance with the provisions of the general data protection regulation and the national law relating to the processing of personal data.

We are required under data protection legislation to make the information contained in this privacy policy accessible to you. This privacy policy sets out which measures are taken to protect your privacy when using our services or products, and what rights you have in this respect.

When processing your personal data we are in most cases the "data controller". This means that we determine the purpose and means of the processing.

By using our services and/or products, you agree to the collection and processing of some of your personal data in accordance with the purpose described in our privacy policy. You are invited to read this privacy policy carefully and familiarise yourself with its content.

Evi Vandenborne is our Privacy Coordinator and you can reach them at eva@buysse-partners.com for any questions or to exercise your rights. Future amendments to this policy cannot be excluded. We therefore ask that you read the privacy policy from time to time.

2. PROCESSING OF YOUR PERSONAL DATA

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We try to collect as little personal information as possible in order to achieve our goals.

We comply with data protection laws which require that the personal information we process about you must be:

- Collected only for valid purpose(s) that we have informed you about.
- Used lawfully, fairly and in a transparent way which means in a way that is relevant to the purpose(s) we informed you about, limited only to those purpose(s) and in no way incompatible with those purpose(s).

- Accurate and kept up to date, kept only as long as necessary for the purpose(s) we have told you about and handled securely.

We may request certain information from you in order to enable you to use or purchase our services or products. If you have any questions do contact our privacy coordinator.

More specifically we will collect any or all of the following data elements :

- Academic title
- Anti Money Laundering (AML) data
- Anti Terrorism data
- Bank account
- Birthday / Age
- Citizen Number
- Company Role
- Company address
- Company by-laws
- Company registration number
- Consent
- Contract
- Correspondence content
- Criminal convictions / offences
- Customer file
- Customer name
- DAC6 data
- Date & time
- Electronic identification data
- Electronic localisation data
- Essential cookies
- Family composition data
- Financial Profile
- Gender
- Home address
- ID card
- ID card number
- IP address
- Images from security camera
- Insurance data
- Insurance policy number
- Involved party name
- Know Your Customer (KYC) data
- Languages
- Marital status
- Marketing cookies
- Military rank

- Moniker
- Name tenant
- Nationality
- Nobility title
- Passport
- Payment History
- Payment balance data
- Performance cookies
- Personal email address
- Personal information about family
- Personal phone number
- Pictures / images
- Place of birth
- Private email usage data
- Profession
- Proof of registration
- Property Location Data
- Property deed or title
- Purchase financing data
- Purchase history data
- Read-receipt data
- Signature
- Survey data
- Third party cookies
- Title
- Travel visum
- Ultimate Beneficial Owner (UBO) data
- VAT number
- Voice recordings data
- Wage / remuneration data
- Work email address
- Work email usage data
- Work phone number

We rely on you to provide us with correct data. If the data changes, we invite you to let us know, so we can keep the data up to date.

We process the data to allow us to deliver the services/products, and to continually improve the services/products available to you and adapt them to your needs. More specifically we perform the below processing:

- **Client intake and dossier handling**

Description: Starting a client account and handling of the customer instruction

Purpose: To ensure execution of the service to the client

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Birthday / Age, Place of birth, Nationality, ID card number, Bank account, Marital status, Personal information about family, Gender , Family composition data, Private email usage data, Electronic identification data, ID card, Citizen Number, Work email address, Customer name, Involved party name, Customer file, VAT number, Company registration number, Payment balance data, Company address, Date & time, Correspondence content, Profession, Financial Profile, Know Your Customer (KYC) data, Anti Money Laundering (AML) data, Ultimate Beneficial Owner (UBO) data, Anti Terrorism data, Company Role, Signature, Consent, Purchase financing data, Company by-laws, Nobility title, Academic title, Title, Moniker, Proof of registration, Contract

Data is processed in the EU

- **Customer Newsletter / promotion**

Description: Newsletter or promotion of products or services in electronic or other form

Purpose: Keeping your clients up to date about what your company has to offer

Legal basis: Legitimate interests

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal email address, Languages , Gender , Pictures / images, Work email usage data, Private email usage data, Electronic localisation data, Voice recordings data, Work email address, Essential cookies, Customer name, Third party cookies, Company address, Correspondence content, Company Role, Marketing cookies, Signature, IP address, Survey data, Read-receipt data, Nobility title, Academic title, Title, Moniker

Data is processed in the EU

- **Security camera**

Description: Capturing and / or storing of security images or video

Purpose: To ensure security, prevent fraud or theft...

Legal basis: Legitimate interests

Retention period: Maximum 4 weeks, unless in case of evidence of the incident: until the incident has been handled

Data items: Images from security camera, Pictures / images, Date & time

Data is processed in the EU

- **Customer prospecting**

Description: Gathering of prospective customer information

Purpose: To communicate goods and services to prospective customers

Legal basis: Legitimate interests

Retention period: All prospects that have not converted to customers will be deleted after 2 years

Data items: Home address , Personal email address, Personal phone number, Work phone number, Birthday / Age, Place of birth, Nationality, Languages , ID card number, Bank account, Marital status, Gender , Family composition data, Work email usage data, Private email usage data, Electronic identification data, Voice recordings data, ID card, Citizen Number, Work email address, Customer name, Involved party name, Customer file, VAT number, Company registration number, Company address, Date & time, Correspondence content, Profession, Financial Profile, Know Your Customer (KYC) data, Anti Money Laundering (AML) data, Ultimate Beneficial Owner (UBO) data, Anti Terrorism data, Property Location Data, Company Role, Signature, Survey data, Read-receipt data, Company by-laws, Property deed or title, Nobility title, Academic title, Military rank, Title, Moniker, Contract

Data is processed in the EU

- **Customer appointments**

Description: Register customer appointments either on paper or on a computer

Purpose: To manage availability and calendar

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Images from security camera, Private email usage data, Work email address, Customer name, Company address, Date & time, Company Role, Title

Data is processed in the EU

- **Mandatory anti-fraud processing**

Description: Information regarding anti-fraud as required by law

Purpose: Ensure compliance with mandatory anti-fraud measures

Legal basis: Legal obligation

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Birthday / Age, Place of birth, Nationality, Languages , ID card number, Bank account, Marital status, Gender , Family composition data, ID card, Citizen Number, Work email address, Customer name, Involved party name, VAT number, Company registration number, Company

address, Financial Profile, Know Your Customer (KYC) data, Anti Money Laundering (AML) data, Ultimate Beneficial Owner (UBO) data, Anti Terrorism data, Company Role, Signature, DAC6 data, Company by-laws, Property deed or title, Title

Data is processed in the EU

- **Correspondence**

Description: Communication with interested parties in electronic or paper form

Purpose: To provide proper service

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Work email address, Customer name, Company address, Correspondence content

Data is processed in the EU

- **Sales of goods or services**

Description: Sales and / or delivery of goods or services to customers

Purpose: To ensure proper sales and or delivery of goods or service, enable track & trace and feedback

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Work email address, Customer name, Customer file, Company address, Signature

Data is processed in the EU

- **Customer invoicing & accounting**

Description: Calculating the fee owed, sending out invoices and ensuring payment

Purpose: To ensure proper payment

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Work phone number, Bank account, Purchase history data, Payment History, Work email address, Customer name, VAT number, Payment balance data, Company address, Signature

Data is processed in the EU

- **Corporate website**

Description: Corporate website for public consultation. May include customer login area.

Purpose: To inform interested and / or business parties

Legal basis: Legitimate interests

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal email address, Electronic identification data, Electronic localisation data, Work email address, Essential cookies, Customer name, Third party cookies, Performance cookies, Marketing cookies

Data is processed in the EU

- **Live stream and/or taping of event**

Description: Live stream and capture of event

Purpose: To preserve a memory of the event

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Personal email address, Pictures / images, Voice recordings data, Work email address, Date & time

Data is processed in the EU

- **International fact finding visits**

Description: Investor international fact finding visits (...)

Purpose: Investor international fact finding visits

Legal basis: Legitimate interests

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Passport, Travel visum

Data is processed in the EU

- **Verhuur woningen**

Description: Verhuur woningen

Purpose: Verhuur woningen

Legal basis: Contract

Retention period: As from termination of contract, retention during the legal period and/or period relevant for legal action

Data items: Home address , Personal email address, Personal phone number, Nationality, Bank account, Wage / remuneration data, Insurance data, ID card, Citizen Number, Criminal convictions / offences , Property Location Data, Name tenant, Insurance policy number

Data is processed in the EU

In the above processing we are the data controller.

Where you provided consent, you have the right to revoke it. You have the right to withdraw your consent at any time.

In case you object to the processing of your data, please contact us so we can evaluate together if a contractual relationship is possible and a continuation of the use of our services is possible.

We also handle supplier data. When we collect, process and store supplier data, we want to make sure we only collect, process and store data we really need and are entitled to handle in this way. In dealing with our suppliers we typically collect, process and store the name, work email and work phone of the person(s) interacting with us. We also collect, process and store the VAT number of our suppliers.

3. PROCESSING OF PERSONAL DATA ON YOUR BEHALF

The specific nature of the work that we perform for you means that we may have to make declarations, filings, notifications, etc. for you based on personal data of others that you provide to us. In that case we are the processor and you are the controller. We will carry out your instructions for the processing, possible subcontracting, the fate of the data at the end of the agreement and the possible transfer of data. We will also take the necessary security measures and assist you in fulfilling your obligations under the GDPR.

4. TRANSFER OF PERSONAL DATA

In order to provide certain services or products we might work with third parties such as IT partners, insurance partners, accounting partners, legal advisors. More specifically we reserve the right to transfer your personal data to our partners.

- Staff remuneration

Purpose: To ensure correct remuneration of all company stakeholders

Legal basis: Legal obligation

Data items: Gender , Staff member name, Work permit data, Attendance data, Work phone number, Company Role, Signature, Insurance data, Contract, Citizen Number, Wage /

remuneration data, Family composition data, Marital status, Personal email address, Working conditions, Place of work, Member Name, Personal phone number, Drivers license , ID card, Staff Performance data, Home address , Profession, CV / resume, Insurance policy number, Labour union membership, Retirement data, Leave / holidays data, Driver Profile, License plate number, Nationality, Education level / diplomas, Bank account, Birthday / Age, Work email address, Sick days, Training during employment, Date of entry into service

Data is processed in the EU

Acerta Sociaal Secretariaat receives the data

- Bookkeeping

Purpose: To ensure correct bookkeeping and/or tax and VAT returns

Legal basis: Legal obligation

Data items: Gender , Staff member name, Work phone number, Signature, Citizen Number, Payment History, Wage / remuneration data, Purchase financing data, Payment balance data, Purchase history data, Personal email address, VAT number, Home address , Customer name, Profession, Company registration number, Consent, Company address, Anti Terrorism data, Electronic identification data, Anti Money Laundering (AML) data, Bank account, Birthday / Age, Work email address, Involved party name, Name tenant

Data is processed in the EU

Exact Holding B.V receives the data

- Social media - Facebook / Instagram

Purpose: To promote the company and its services

Legal basis: Legitimate interests

Data items: Customer name, Electronic identification data, Pictures / images, Date & time, Electronic localisation data

Data is processed in the EU

Facebook Ireland Ltd. (joint controller) receives the data

- Legal support

Purpose: To ensure proper legal support

Legal basis: Legitimate interests

Data items: Company Role, Customer file, Signature, Contract, Citizen Number, Payment balance data, Marital status, Ultimate Beneficial Owner (UBO) data, Claim specific information, VAT number, ID card, Customer name, Know Your Customer (KYC) data, Company address, Anti Terrorism data, Electronic identification data, Financial Profile, Company by-laws, Anti Money Laundering (AML) data, Bank account, Proof of registration, Birthday / Age

Data is processed in the EU

Argo Law BV receives the data

- Social media - LinkedIn

Purpose: To promote the company and its services

Legal basis: Legitimate interests

Data items: Staff member name, Electronic identification data, Pictures / images, Date & time, Electronic localisation data

Data is processed in the EU

LinkedIn Ireland Unlimited Company receives the data

- IT Support

Purpose: To ensure proper running of the IT environment

Legal basis: Legitimate interests

Data items: Work phone number, Signature, Contract, Payment History, Payment balance data, Property Location Data, Personal email address, Personal phone number, VAT number, ID card, Home address , Customer name, Know Your Customer (KYC) data, Company address, Private email usage data, Electronic identification data, Nationality, Bank account, Work email address, Involved party name, Name tenant

Data is processed in the EU

EASI - Adfinity NV receives the data

- IT Support

Purpose: To ensure proper running of the IT environment

Legal basis: Legitimate interests

Data items: Customer name, Personal email address, Electronic identification data

Data is processed in the EU

DocuSign International (EMEA) Ltd receives the data

- Marketing platform - Mailchimp

Purpose: Promotion of the company and its services

Legal basis: Legitimate interests

Data items: Personal email address

Data is processed in the EU

The Rocket Science Group LLC (Mailchimp) receives the data

If we receive personal data from a third party referring you to us, we assume this data is obtained directly from you or with your consent. If this is not the case, please advise us immediately.

These third parties will generally act as data processor. Please do note that social media platforms, commerce platforms and structural sales partners are often regarded as joint controllers.

If you participate in an online call, meeting, conference,... do note that any data you choose to share will be visible and/or audible to the other participants. Please consider this before sharing your personal details, video, audio or any other data.

In case you object to the transfer of your data, please contact us so we can evaluate together if a contractual relation is possible and a continuation of the use of our services is possible.

Please do note that we may be required by law to process certain data and, as the case may be, to transmit them to the relevant authorities. As this is a legal obligation you can not object this transfer.

5. SECURITY & CONFIDENTIALITY

We undertake to keep your personal data secure & confidential and have established security procedures to avoid any loss, abuse or alteration to this personal data in line with industry best practices.

6. WEBSITE & COOKIES

Navigation on our website may result in cookies being saved to your computer. They simplify the visit and improve your experience. When visiting our website you will be informed of the cookies being used and we will ask you for your consent. Furthermore, each time you visit our website, the webserver automatically processes your IP address and/or your domain name.

We may publish links to websites owned and operated by third parties. If you click on such a link you will navigate to another website. Please make sure you read and understand the privacy policy of that website, as it may differ from our policy and is outside of our control. If you feel unsure or cannot agree with the policy, we suggest you leave that website.

7. SOCIAL MEDIA

If you use the social media functions such as eg “like” or “share” button that may be on our website, or if you visit our social media page, please know that your personal data will be processed by the social media platform. In this processing, the European regulator considers us and the social media platform

both to be joint data controllers, which means that we jointly determine why and how your personal data is processed. You can find out how we process your personal data in this privacy statement. You can find information about the processing by the relevant social media platform in their privacy statement. We ask you to read the privacy statement of the social media platform carefully before visiting the social media items on our page or our page on the social media platform.

If we hold an event such as a network event, opening event, premiere etc. we might have photographers or videographers present. The photos and videos they shoot are purposed to be used in marketing materials and / or published on our social media pages. When you are not the main subject of these materials the data protection authority's guidance is that your GDPR explicit consent is not required. However, should you oppose to us using materials where you are depicted, please let us know.

8. EXERCISING YOUR RIGHTS

In accordance with the general data protection regulation you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Withdraw your prior consent to processing at any time.
- The right to object to a decision based solely on automated processing, including profiling.
- The right to receive your personal data in a structured, commonly used and machine-readable format and have transmit those data to another controller (commonly known as a "data portability request").

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You can exercise your rights by contacting our Privacy Coordinator Evi Vandenborne via eva@buisse-partners.com or at the below company address:

Buysse & Partners Holding NV

c/o Evi Vandenborne

Jan van Rijswijklaan 162/1 2020 Antwerpen Belgium

9. DATA PROTECTION AUTHORITY

You can direct any complaints and comments to the competent data protection authority at the below address:

Gegevensbeschermingsautoriteit / Autorité de protection des données

Drukpersstraat 35, 1000 Brussel / Rue de la Presse 35, 1000 Bruxelles

<https://gegevensbeschermingsautoriteit.be> <https://autoriteprotectiondonnees.be>