cookie Policy

This Cookie Policy governs the use of cookies on the website <https://www.alfavision.be> (hereinafter: “**Website**”) by AlfaVision BVBA (hereinafter: “**AlfaVision**”, “**we**”, “**us**”, “**our**”).

Cookies are small text files which are stored on a device’s hard drive and which contain certain information and sometimes personal data.

Social media plugins are small pieces of software developed and provided by social media service providers (e.g. Facebook, LinkedIn, Google, YouTube, Pinterest, Instagram and Twitter), which add social media integration when built into a Website.

**NOTE:** If you want general information on how we process your personal data other than the processing through cookies, including in relation to your communication with us via e-mail, telephone, fax and social media and in relation to any order or purchase, please refer to our Privacy Policy: [add link].

**By continuing to use the Website after having been informed of the use of cookies and social media plugins, you acknowledge that you have read this Cookie Policy carefully and that you agree with it without reservation. You may at any moment change your cookie preferences through the cookie-settings.**

# In general

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| * 1. Your personal data are processed by AlfaVision, an entity acting as data controller.

AlfaVision can be contacted at: AlfaVision BVBA, Houtkaai 23/0202, 8000 Brugge, Belgium, registered under BE 0567.806.425. Questions regarding the processing of your personal data or as a result of our use of cookies or social media plugins can be directed at: info@alfavision.be.  |
| * 1. Where reference is made to certain laws or regulations, such reference shall also include any change, replacement or annulment of said laws or regulations, including any related executive decisions.
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| * 1. AlfaVision reserves the right to modify, change or amend the Cookie Policy at its own discretion and from time to time. Such modification, change or amendment shall be communicated via the Website.
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# COOkies

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| * 1. You can avoid cookies being placed by configuring your browser as such. Guidelines as to how to do this can be found here:
		+ Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
		+ Microsoft Edge: <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>
		+ Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
		+ Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
		+ Safari:<https://support.apple.com/kb/PH21411?locale=nl_BE&viewlocale=en_US>

However, not allowing cookies when visiting the Website may cause certain or all features of the Website to stop working properly. |
| * 1. When you visit the Website, AlfaVision places a number of cookies. Most data pertaining to these cookies, their placement and use allow to identify you, and AlfaVision uses them to gain insight in how you and other visitors use the Website by gathering statistical and usage data, enabling AlfaVision to provide a better user experience on the Website.
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| * 1. AlfaVision knows about the following cookies being used on the Website:
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| * Analytical and statistical cookies
* **Google Analytics**: AlfaVision uses Google Analytics cookies to determine how you and other visitors use our Website. With these insights AlfaVision is able to improve its services. The cookies AlfaVision uses are:
* \_gat cookie (1 minute lifespan);
* \_gid cookie (1 day lifespan), and
* \_ga cookie (2 year lifespan).
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| * Advertising cookies:
* **Google:** Google places the following cookies to collect user information and personalized settings and to place advertisements. This concerns the following cookies:
* 1P\_JAR, OTZ and OGPC cookie (1 month lifespan);
* CONSENT cookie (18 year lifespan);
* NID cookie (6 month lifespan);
* ANID (1 year lifespan) and
* DV cookie (session lifespan).
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| * 1. We ask for your consent for placing cookies on your device. You may at all times withdraw your consent with AlfaVision’s use of cookies. To exercise this right, it suffices to delete the cookies that have been placed on your device. To do so, you are kindly asked to refer to the appropriate instructions of your browser manufacturer, as listed above.
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# purposes for which AlfaVision uses your personal data

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| * 1. AlfaVision processes your personal data to perform statistical analyses so that we may improve our Website, products and services or to develop new products and services.
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| * 1. AlfaVision processes your personal data for commercial purposes.
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| * 1. AlfaVision may process your personal data for informing any third party in the context of a possible merger with, acquisition from/by or demerger by that third party, even if that third party is located outside the EU.
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| * 1. AlfaVision may also process your personal data for the preservation of the legitimate interests of AlfaVision, its affiliates and partners or a third party if and when your use of the Website can be considered (a) a violation of the general terms and conditions or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity the Website, c) a threat to the Website or to any of AlfaVision’s or its subcontractors’ underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.
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| * 1. AlfaVision processes your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities. AlfaVision may at its own discretion transfer your personal data to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you.
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# Legal basis for processing your personal data

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| * 1. For processing your personal data under the conditions outlined in clauses 3.1 and 3.2 AlfaVision as the responsible party asks for **your consent**.
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| * 1. The processing of your personal data for the purposes outlined in clauses 3.3 and 3.4 is necessary for the purpose of the **legitimate interests** of AlfaVision, which are:
		+ Informing a third party in the context of a possible merger, acquisition, or other similar transactions;
		+ To ensure security.
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| * 1. The processing of your personal data for the purposes outlined in clause 3.5 is necessary to allow AlfaVision to comply with its **legal obligations**.
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# Recipients

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| * 1. With the exception of the situations described under 5.2 and 5.3, AlfaVision does not send your personal data in an identifiable manner to any third party without your explicit permission to do so. However, you understand that the use of analytical and statistic cookies and advertising cookies may imply that the external providers of these cookies may gain some information about you, including about your browsing habits.
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| * 1. AlfaVision may share your personal data with other entities within the AlfaVision group if necessary for one of the purposes outlined above.

However, we will ensure that all AlfaVision group entities will take due care that all processing of your personal data is in line with what is set out in this Cookie Policy. |
| * 1. AlfaVision relies on third party processors to provide you the Website as well as to process your personal data on our behalf. These third-party processors are only allowed to process your personal data on behalf of AlfaVision upon explicit written instruction of AlfaVision. AlfaVision warrants that all third party processors are selected with due care and are obliged to observe the safety and integrity of your personal data.

In principle, your personal data will only be processed within the European Economic Area (this includes the EU, Norway, Iceland, and Liechtenstein).Should for the purposes outlined above a transfer outside of the EEA be needed, AlfaVision will ensure that your personal data will be protected as much as possible. |

# Quality assurances

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| * 1. AlfaVision does its utmost best to process only those personal data which are necessary to achieve the purposes listed above.
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| * 1. Your personal data are only processed for as long as needed to achieve the purposes listed above or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Website or that we have to terminate the provision of certain services. AlfaVision will de-identify your personal data when they are no longer necessary for the purposes outlined above, unless there is:
		+ an overriding interest of AlfaVision or any other third party in keeping your personal data identifiable;
		+ a legal or regulatory obligation or a judicial or administrative order that prevents AlfaVision from de-identifying them.
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| * 1. AlfaVision will take the appropriate technical and organizational measures to keep your personal data safe from unauthorized access or theft as well as accidental loss, tampering or destruction. Access by personnel of AlfaVision or its third-party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only which can never be guaranteed.
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# Your rights

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| * 1. You have the right to request access to all personal data processed by AlfaVision pertaining to you. You will be required to specify with regard to which processing activity you wish to exercise your right of access.

AlfaVision reserves the right to deny certain requests for access, if those requests are clearly only intended to cause nuisance. AlfaVision reserves the right to deny your request if granting it would cause disproportionate negative consequences to the rights and freedoms of others, including AlfaVision itself. |
| * 1. You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.
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| * 1. You have the right to withdraw your earlier given consent for processing your personal data.
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| * 1. You have the right to request that personal data pertaining to you be deleted if they are no longer required in light of the purposes outlined above or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by AlfaVision against:
		+ overriding interests of AlfaVision or any other third party;
		+ legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion you can also ask that AlfaVision limits the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate or (c) the data are no longer needed for the purposes listed above but you need them to defend yourself in judicial proceedings. |
| * 1. You have the right to oppose the processing of personal data if you are able to proof that there are serious and justified reasons connected with his particular circumstances that warrant such opposition. In such case, you must inform us of those reasons so that we may assess your request in a correct manner. However, if the intended processing qualifies as direct marketing, you have the right to oppose such processing free of charge and without justification.
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| * 1. You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us in the circumstances described under clause 4.1 and if the processing was conducted via automated means.
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| * 1. If you wish to submit a request to exercise one or more of the rights listed above, you can send an e-mail to AlfaVision. An e-mail requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such request should clearly state which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card proving your identity. If you use the contact form, AlfaVision may ask you for your signed confirmation and proof of identity.

AlfaVision will promptly inform you of having received this request. If the request proves valid, AlfaVision shall honour it as soon as reasonably possible and at the latest thirty (30) days after having received the request.If you have any complaint regarding the processing of your personal data by AlfaVision, you may always contact AlfaVision via the e-mail address info@alfavision.be. If you remain unsatisfied with AlfaVision’s response, you are free to file a complaint with the competent data protection authority, i.e. the Belgian Data Protection Authority. |