**AlfaVision**

**Privacy Policy**

This Privacy Policy governs the processing of your personal data by AlfaVision whenever you use our website, [www.alfavision.be](http://www.alfavision.be) (hereinafter: “Website”) and the associated services (hereinafter: “Services”).

When you use the Website, we will use cookies and comparable technologies. As a result, we process your personal data. If you want information on how we process personal data via cookies, you are kindly referred to our Cookie Policy [add link].

# In general

|  |  |
| --- | --- |
| **PROVISION** | **EXPLANATION** |
| * 1. Your personal data are processed by AlfaVision BVBA, Houtkaai 23/0202, 8000 Brugge, België, registered under BE 0567.806.425 (hereinafter: “AlfaVision”, “we”, “us”). You can contact us through info@alfavision.be.
 | This is the entity responsible for the processing of your personal data as covered in this Privacy Policy. |
| * 1. Any notion starting with a capital shall be defined by explicit reference in this Privacy Policy. Where possible given the context, singular words shall be interpreted as also including the plural and vice versa.
 | To make sure we have the same understanding of what is written here, it is important that certain notions are interpreted in the same way by you and by us. |
| * 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.
 | Laws tend to change from time to time, and we want to make sure that this Privacy Policy remains in line with any such changes. |
| * 1. AlfaVision reserves the right to modify, change or amend this Privacy Policy at its own discretion and from time to time. Such modification, change or amendment shall be communicated via the Website. If you do not accept the modifications, changes or amendments, you are to inform us by sending an e-mail the address mentioned in clause 1.1.

If we do not receive such an e-mail from you within three (3) business days after the changes to the Privacy Policy have been announced in a visible manner on our Website, you will be deemed to have unambiguously accepted all such changes. | As any company, changes in laws, market circumstances, interests etc. may require us to change our Privacy Policy from time to time to ensure that it remains accurate.If this happens, you are kindly asked to take note of the changes and to agree with them if you find them acceptable. |

# Types of personal data we process

|  |  |
| --- | --- |
| PROVISION | EXPLANATION |
| * 1. Whenever you use our Website and Services, we may collect:
		+ **technical information** associated with the browser and the device you use, such as your IP address, browser type, and part of the webpage you visited when you gained access to the Website.
 | Here we explain which types of personal data we collect in any case whenever you visit our Website. |
| * 1. When you use our Services, we may collect:
		+ **Iidentity information:** name, company name, date of birth and gender;
		+ **Payment information:** account number;
		+ **Contact data:** home address, company address, e-mail address and phone number. These include correspondence data to and from Alfavision, as well as communication preferences.
 | Here we explain which types of personal data we collect when you use our Services.  |
| * 1. Whenever you leave us your business card or interact with us at events at which we are present, when you use the contact form on the Website, or contact us through social media, we may collect:
		+ the **basic identity information**, as mentioned on your business card, including name, e-mail address, postal address, telephone number, the company you work for, and your function;
		+ the **content of your communication** and the **technical details of the communication** itself;
		+ **your preferences regarding receiving our e-mail communications**;
		+ **Any other information** you may share with us or is available through social media;
		+ your **image**.
 | Here we explain which types of personal data we collect when you actively seek to contact us. |

# Purposes for which AlfaVision uses your personal data

|  |  |
| --- | --- |
| PROVISION | EXPLANATION |
| * 1. AlfaVision processes your personal data to provide you with the Website and Services.

For this, we rely on the necessity of the processing in executing the contract between you and us.  | To provide you with our Website and Services, we have to process certain personal data. |
| * 1. AlfaVision processes your personal data mentioned under clauses 2.2 and 2.3 to communicate on commercial developments.

For this, we rely on your consent to this communication. You can at any time revoke your consent. **By consenting to the processing of your personal data for commercial purposes, you agree that these personal data are processed as described in this Privacy Policy.** | We would like to inform you on updates and new developments.  |
| * 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.

For this, we rely on the necessity of the processing for complying with our legal obligations. | In some cases, we may be legally required to process your personal data. |
| * 1. AlfaVision processes your personal data to perform statistical analyses in order to conduct research so that we may improve our Website, our Services or develop new products and services.

For this, we rely on the necessity of the processing for our own legitimate interests. The interests at stake here are the importance of continuing to offer services of a high quality and the importance of developing new products and services. | We may process personal data for research purposes and for the development of our Services. |
| * 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.

For this, we rely on the necessity of the processing for our own legitimate interests. At stake here are our our corporate and commercial interests. | This provision is self-explanatory. |
| * 1. AlfaVision may process your personal data for the preservation of the legitimate interests of AlfaVision, its partners or a third party if and when your use of the Website or Services can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website or Services, or the underlying infrastructure, systems or services due to, but not limited to, viruses, malware, spyware, or any other form of malicious code, or (c) in any way hateful, discriminating, racist, slanderous, spiteful, hurtful or in some other way illegal.
 | When misusing our Website or Services, we may process personal data in our legitimate interests. |

# Location and transfer

|  |  |
| --- | --- |
| PROVISION | EXPLANATION |
| * 1. AlfaVision will share your personal data exclusively with the following categories of recipients”
* Subcontractors and partners of AlfaVision, with whom we have an agreement and who help us to offer the Website and associated functionalities, such as IT service providers;
* Third parties with whom we negotiate in the framework of fusions, takeovers, or other operations.
 | To offer our Services, some personal data must be communicated to third parties. |
| * 1. AlfaVision does not send your personal data to any third party without your permission to do so. You understand, however, that if you use our social media channels, your personal data is also processed by the social media providers. You can find more information on how these social media providers process your personal data in their respective privacy policies.
 | We do not share your personal data with third parties unless you consent to it or unless we have anonymized your personal data. You understand however that when you use Facebook for instance to communicate, Facebook also processes your personal data.  |
| * 1. Your personal data may be processed outside of the European Union. In case of such transfer, AlfaVision will ensure that it concerns a third country with adequate protection of personal data, or that the necessary contractual arrangements are in place between AlfaVision and the service provider in such third country.
 | This provision is self-explanatory. |

# Quality assurances

|  |  |
| --- | --- |
| PROVISION | EXPLANATION |
| * 1. AlfaVision does its utmost to process only those personal data which are necessary to achieve the purposes listed under clause 3.
 | We will not process more personal data about you than we really need for the purposes we have communicated to you. |
| * 1. Your personal data are only processed for as long as needed to achieve the purposes listed under clause 3. Afterwards, AlfaVision will de-identify your personal data, unless there is:
		+ an interest of AlfaVision or any other third party in keeping your personal data identifiable and when this interest overrides your fundamental rights;
		+ a legal or regulatory obligation or a judicial or administrative order that prevents AlfaVision from de-identifying them.
 | Here we explain how long we will keep your personal data in a way that allows us to identify you. |
| * 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 to your personal data will be limited to personnel of AlfaVision and its appointed processors that effectively require access to realize the purposes listed under clause 3. All personnel having access to your personal data are bound to a duty of confidentiality. You understand, however, that safety and security are best efforts obligations only, which can never be guaranteed.
 | We are committed to keeping your personal data safe. |

# Your rights

|  |  |
| --- | --- |
| PROVISION | EXPLANATION |
| * 1. You have the right to request access to all personal data processed by AlfaVision pertaining to you when using the Website or Services. AlfaVision reserves the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to AlfaVision.
 | In this article we explain which rights you have vis-à-vis the processing of your personal data. The rights themselves are self-explanatory. |
| * 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.
 |
| * 1. You have the right to withdraw your earlier given consent under clause 3.2 for processing your personal data.
 |
| * 1. You have the right to request that personal data pertaining to you will be deleted if they are no longer required in light of the purposes which are outlined under clause 3. However, a request for deletion will be evaluated by AlfaVision against:
		+ interests of AlfaVision or any other third party in keeping your personal data identifiable and when this interest overrides your fundamental rights;
		+ legal or regulatory obligations or administrative or judicial orders which may prevent AlfaVision from 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 under clause 3, but you need them to defend yourself in judicial proceedings. |
| * 1. You have the right to oppose the processing of personal data in the cases determined under clauses 3.4, 3.5 and 3.6, if you are able to prove that there are serious and justified reasons connected with his particular circumstances that warrant such opposition. However, if the intended processing qualifies as direct marketing, you have the right to oppose such processing free of charge and without justification.
 |
| * 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.
 |
| * 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 info@alfavision.be for all data subject rights matters.

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 and specify which right you wish to exercise and the reasons for it if such is required according to clauses 6.1 to 6.6. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card or other document proving your identity. AlfaVision will promptly inform you of having received this request. If the request proves valid, AlfaVision shall notify 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 mentioned in this clause. 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. For more information, visit <http://www.privacycommission.be>.  |