

PRIVACY CHARTER - COHERSA BRUSSELS srl - Platform accessible to customers

In force since : [28/09/2023]

Last modified: [09/28/2023]

We make it a point of honour to respect the privacy of the people whose personal data we process (Internet users, employees, customers, suppliers, etc.) and to treat such data in the strictest confidence and in accordance with current legislation.

The purpose of this Privacy Policy is to inform you, in a transparent manner, about the data we collect, the purpose for which we collect it, how we use it and the rights you have concerning the processing of your personal data.

Please read this privacy policy carefully. Should you have any further questions, please do not hesitate to contact us at the following address: ZMedia@luctiseurope.eu

GENERAL DISCLAIMER

1.1 COHERSA BRUSSELS SRL (hereinafter “ We” or “COHERSA”) respects the privacy of its customers (hereinafter, the or “ Data Subject ‘ or ’ You ”)

1.2 We process the personal data transmitted to us in accordance with current legislation, and in particular with Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, applicable since 25 May 2018 (hereinafter, the “ RGPD ”) as well as the Belgian law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (hereinafter, the “ Law ”).

1.3 Access to our COHERSA platform (hereinafter, the “ Platform ”) or the use of our services implies your full and unreserved acceptance of this privacy charter (hereinafter, the “ Charter ”), as well as our general terms of use (hereinafter, the “ Terms of Use (TOU)”) and the cookie policy (hereinafter, the “ Cookie Policy[PGG1] ”). With regard to the Platform, the Charter is valid for all pages hosted on the Platform and for Platform registrations. It does not apply to pages hosted by third parties to which we may refer and whose privacy policies may differ. We cannot therefore be held responsible for any data processed on or by these sites.

1.4 You acknowledge that you have read the information below and authorize us to process, in accordance with what is specified in the Charter, the personal data that you communicate to us in the context of the services offered to you.

2. DATA CONTROLLER AND DATA PROTECTION OFFICER

2.1 In the course of our activities, you may be required to provide us with some of your personal data. In this case, we are, within the meaning of the RGPD, the Data Controller and here are our contact details:

COHERSA BRUSSELS SRL

Postal address: Rue Robert Scott 28, 1180 Uccle

VAT: BE 0504.865.303

[e-mail address: Zmedia@luctiseurope.eu]

2.2 We have appointed a Data Protection Officer (more commonly referred to as “ DPO ”) as a single point of contact within our organization, whose contact details are as follows:

DPO / [Marc Vandewalle]

[Route de Lennik 451 1170 Brussels

[BE0504.865.303]

Any questions or requests concerning the processing of your data can be sent to the following address: [Zmedia@luctiseurope.eu].

3. DATA COLLECTED

By registering or filling in a form made available by COHERSA on the Platform or in paper format, you allow us to record and store, for the purposes mentioned in this Charter, the following information:

- your identification data (particularly in the context of our services requiring authentication) such as your first and last name, title, e-mail address, user account, account password, date of birth, telephone numbers and postal address;
- your professional data, such as the company you work for, your job title, your business telephone number and the company's postal address;
- your bank details if applicable (credit card number, IBAN and BIC/SWIFT);
- your communications with COHERSA;
- the type of domain you use to connect to the Internet;
- the IP address assigned to you;
- the date and time of access to the Platform and other traffic data;
- location or other communication data;
- the pages you visit on the Platform;
- the type of browser, platform and/or operating system you use;
- your browsing preferences. In order to facilitate your navigation on the Platform and to optimize technical management, our Platform may use “cookies”. All information relating to cookies can be found in our Cookie Policy available here[PGG2];
- information that you voluntarily transmit to us for a purpose defined in the Charter, the GCU, the Cookie Policy, on the Platform or on any other communication medium used by COHERSA;
- additional information that we may request from you in order to identify you.

We also collect some of your data through third parties. This is particularly the case when in the context of the contractual relationship established with COHERSA or in the context of our promotional activities organized in accordance with the applicable regulations on e-privacy and the protection of personal data.

4. PURPOSES OF PROCESSING

4.1. We process your data for various purposes. For each processing operation, only the data relevant to the purpose in question is processed. Processing consists of any operation (manual or automated) on personal data. We collect, store and use your personal data for the following purposes:

- To provide you with our services in accordance with the contract we have entered into with you;
- To set up your account on the Platform or personalize your account;
- To understand, diagnose and resolve problems encountered on the Platform;
- To respond to your requests and questions, in particular when you contact our customer service department;
- To carry out statistical surveys;
- For marketing, promotional and advertising purposes, where you have consented or on the basis of our legitimate interests where permitted by applicable law;
- To comply with a legal obligation to which we are subject;
- To comply with a request from the competent authorities;
- To establish, exercise or defend our rights;
- To detect and prevent fraud;
- For any other purpose for which you have expressly given your consent.

4.2 The legal basis for the processing of your personal data is :

- Your consent:

In particular, we subject the processing of your data to your consent when you subscribe to a COHERSA promotional service (e.g. sending Newsletters).

If the legal basis for our processing is your consent, you have the right to withdraw your consent at any time without prejudice to the lawfulness of the processing carried out prior to the withdrawal.

- Fulfilment of your request:

We need to collect some of your data to respond to any request from you. If you choose not to share this data with us, it may make it impossible for us to perform our contract.

- A legal obligation imposed on us:

We need to collect and retain some of your data to meet various legal obligations, including tax and accounting.

- Our legitimate interest, insofar as it is consistent with your interests, freedoms and fundamental rights:

We do indeed have a legitimate interest in processing certain information and exchanging with you, in particular to respond to your requests or improve our services, prevent abuse and fraud, monitor the regularity of our operations, exercise, defend and preserve our rights, for example in the event of disputes, as well as build up evidence of any violation of our rights, manage and improve our relationship with you, continuously improve our Platform as well as our services, unless these interests are overridden by your interests or your fundamental freedoms and rights requiring the protection of your personal data. In any event, we will maintain a proportionate balance between our legitimate interests and respect for your privacy.

5. RIGHTS OF THE DATA SUBJECT

5.1 In accordance with the RGPD, you have the following rights:

- Right to be informed of the purposes of the processing and on the identity of the data controller (COHERSA) ;
- Right to access your data; you may at any time access the data we hold on you or check whether you are included in COHERSA's database;
- Right to rectify your data: we take all reasonable steps to ensure that the data we hold is up to date. We nevertheless encourage you to access your account from time to time or to consult us to check that your data is up to date. If you find that your data is inaccurate or incomplete, you have the right to ask us to rectify it;
- Right to object to the processing of your data: you may at any time object to the use of your data by COHERSA and our active partners;
- Right to delete your data: you may request the deletion of your personal data at any time, with the exception of data that COHERSA is legally obliged to retain;
- Right to limit the processing of your data: you may obtain the limitation of processing when you have objected to the processing, when you dispute the accuracy of your data, or when you consider that the processing is unlawful;
- Right to the portability of your data: you have the right to receive the data that you have communicated to COHERSA and may also ask us to transmit this data to another data controller.

5.2 In order to exercise these rights, we invite you to send us a written request, accompanied by a copy of your identity card or passport:

by e-mail: [Zmedia@luctiseurope.eu].

by post to

COHERSA BRUSSELS SRL

Postal address: Rue Robert Scott 28 1180 Uccle

VAT : BE 0504.865.303

5.3 We will then do our utmost to satisfy your request as quickly as possible and in any event within one month of receipt of your request. If necessary, this period may be extended by two months, depending on the complexity and number of requests.

6. COMPLAINTS TO THE DATA PROTECTION AUTHORITY

You also have the right to lodge a complaint with the Belgian Data Protection Authority at the following contact address:

Data Protection Authority

Rue de la Presse, 35, 1000 Brussels

Tel : +32 (0)2 274 48 00

E-Mail : contact@apd-gba.be

7. RETENTION PERIODS

7.1 We retain the personal data of Data Subjects for as long as is necessary for the purposes set out in this Charter.

7.2 Retention periods may vary from one processing operation to another, depending on the purpose and the legal basis for such retention periods.

7.3 We may also continue to hold personal data relating to you, in particular when you unsubscribe from the Platform and our services, including any correspondence or requests for assistance addressed to COHERSA, in order to be able to respond to any

questions or complaints addressed to us subsequent to the processing, in order to guarantee the smooth running of our activities and in order to comply with all applicable laws, in particular in tax matters or within the framework of other legal requirements.

8. SECURITY

8.1 We take appropriate organizational and technical measures to ensure a level of security appropriate to the risk and to ensure that the servers hosting the personal data processed prevent, as far as possible :

- unauthorized access to or modification of such data ;
- inappropriate use or disclosure of such data;
- unlawful destruction or accidental loss of such data.

8.2 In this respect, members of our staff who have access to such data are subject to a strict obligation of confidentiality.

8.3 You undertake not to commit any act that may be contrary to this Charter, the GCU, the Cookie Policy or, in general, to the law. Violations of the confidentiality, integrity and availability of computer systems and of the data stored, processed or transmitted by these systems, or attempts to commit any of these violations, are punishable by imprisonment of between three months and five years and a fine of between twenty-six euros and two hundred thousand euros or one of these penalties only, without prejudice to any other legal provisions applicable to such violations.

9. DISCLOSURE TO THIRD PARTIES

9.1 We regard personal data as confidential information. We do not disclose it to third parties under conditions other than those specified in the Charter, for the purposes intended or as required by law.

9.2 Access to data, in addition to that reserved for COHERSA and members of our staff, may, in certain cases, be granted to certain categories of external recipients, such as our technical service providers, our hosting providers, our IT business partners, our legal advisors and the communications agencies with which we work. The updated list of these recipients may be requested from COHERSA at any time.

9.3 The communication of this information to the aforementioned persons must, in all circumstances, be limited to what is strictly necessary or required by the applicable regulations.

10. TRANSFER TO A COUNTRY OUTSIDE THE EUROPEAN ECONOMIC AREA

10.1 We will only transfer data to a country outside the European Economic Area where that country provides an adequate level of protection within the meaning of the applicable legislation and, in particular, within the meaning of the RGPD (for more information on countries offering an adequate level of protection, see the European Commission's page: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_fr), or within the limits permitted by the applicable legislation, for example by ensuring data protection through appropriate contractual provisions.

10.2 The information we process will be transferred or transmitted, or stored and processed, for example in other countries outside the one in which you live, for the purposes described in this Charter. These data transfers are necessary to provide the services or to carry out the processing operations set out in the Charter. We use standard contractual clauses approved by the European Commission and rely on European Commission adequacy decisions concerning certain countries, where applicable, for data transfers outside the European Economic Area. If you have any questions in this regard, please do not hesitate to contact us at the following address: Zmedia@luctiseurope.eu

11. UPDATES AND MODIFICATIONS TO THE CHARTER

We may modify and adapt the Charter, in particular in order to comply with any new applicable legislation and/or regulations, the recommendations of the Belgian Data Protection Authority, the guidelines, recommendations and best practices of the European Data Protection Committee, and the decisions of the relevant courts and tribunals, by informing the Data Subjects via the Platform, by e-mail or in any other way. We therefore recommend that you consult the Privacy Policy regularly, referring to the date of the last modification indicated at the top of this document. If you object to any modification of the Privacy Policy, we invite you to immediately stop using the Platform or COHERSA's services and you may ask us to delete your personal data in compliance with the legal provisions.

12. VALIDITY OF CLAUSES

12.1 Our failure to avail ourselves, at a given moment, of a provision of the Charter, may not be interpreted as a renunciation to subsequently assert our rights by virtue thereof.

12.2 The nullity, lapse or unenforceability of all or part of any of the preceding or following provisions shall not invalidate the Charter as a whole. The provision which is wholly or partially null, void or unenforceable shall be deemed unwritten. We undertake to replace any such provision with another that pursues, as far as possible, the same objective.

13. APPLICABLE LAW AND JURISDICTION

13.1 The validity, interpretation and/or execution of the Charter are subject to Belgian law, to the fullest extent permitted by applicable rules of private international law.

13.2 In the event of any dispute relating to the validity, interpretation or execution of the Charter, the French-speaking Courts and Tribunals of the judicial district of Brussels shall have exclusive jurisdiction, to the fullest extent permitted by applicable rules of private international law.

13.3 Before taking any steps towards the judicial resolution of a dispute, we undertake, together with the Person concerned, to attempt to resolve it amicably. To this end, we

undertake first to contact each other, before resorting, where appropriate, to mediation, arbitration or any other alternative dispute resolution method.