



Gantrex Privacy Policy

1 Document owner and version history

Document owner: Angélique Lecomte (Privacy Officer)

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01	18/01/2024	Angélique Lecomte	Axel Boitel	First version
02	27/11/2024	Angélique Lecomte	Axel Boitel	Adding "My Gantrex" and "Gantrex EasyCheck"

2 Who are we?

2.1 Gantrex as data controller

With this statement (hereafter referred to as the 'Statement') we wish to inform you why and how your personal data are collected and processed by Gantrex, with registered office at Rue du Commerce, 19, 1400 Nivelles (Belgium) (hereafter collectively referred to as 'We' or 'Gantrex').

Our contact details can be found in point 11 of this Statement.

We are responsible for processing the personal data that We request and use. As the data controller, We take the measures that ensure that you:

- Continue to be informed about our processing of your personal data and your rights;
- Retain control of the personal data that We process;
- Are able to exercise your rights relating to your personal data. More information on your rights can be found in point 9 of this Statement.

3 What information do we collect about you?

3.1 Personal data

'Personal data' means all information relating to a given living natural person. The type of personal data We collect depend on the services you request and include, where applicable, data about you and/or your representatives, personnel, self-employed staff and/or directors (hereafter jointly also referred to as 'You' or 'Your').

If We receive your personal data from your representatives, personnel, self-employed staff and/or directors, you must inform them of the existence and content of this Statement, including our duties, their rights and the way in which they can exercise these rights.

In particular, we collect administrative data and contact details. This makes it possible for us to identify you or contact you, or We can do business with you if you are a customer, a supplier or a business partner. These personal data may be contact details such as your name, address, telephone number, email address, or your bank account number.

We collect and process none of the so-called sensitive data, namely:

- Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;
- Genetic or biometric data (e.g. facial images and fingerprints);

- Health-related information;
- Data relating to sexual behaviour or sexual orientation.

If such sensitive personal data were to be provided to us, we would not use them and we would delete them.

3.2 Minors

It is not our intention to process the personal data of minors.

4 Why do we need your data?

4.1 Because it is necessary to be able to function as a company

- What does this purpose entail?

This objective amounts to what is called a 'legitimate interest'. We do indeed still have a number of legitimate interests on which the processing of personal data is based. We may use your personal data to be able to create your account as a contact in the scope of our usual business.

For example, personal data are processed in various situations:

- Personal data used to support our business activities and transactions;
- Personal data can serve as proof (archives);
- Personal data may be used to establish, exercise, defend and indemnify our rights or those of the persons who my represent us, for example, in the event of disputes;
- Personal data can be used for the administration, (risk) management and monitoring of our organisation, including for matters relating to compliance (e.g. money laundering, fraud prevention and investigations and privacy), risk management, risk functions and inspection, complaint management and internal and external audits;

- Which personal data do we process to this end?

We collect and process your name, email address, phone number, employer/company details, job position.

This happens only after we have made the assessment that in any case the balance between our legitimate interests and the potential impact on your privacy will not be disturbed.

If you nevertheless have objections to this processing, you can exercise your rights to object as mentioned in point 10.3 of this statement.

4.2 Provision of additional services

- What does this purpose entail?

We may use your personal data to be able to create your account to carry out additional and optional services provided by our company:

- ✓ Downloading technical documentation from our website www.gantrex.com;
- ✓ "Contact us" form in our website;
- ✓ Portal "My Gantrex" to selected customers;
- ✓ Application "Gantrex EasyCheck" to selected customers;
- ✓ Customer Satisfaction Survey;

We request your express consent for above additional services.

- Which personal data do we process to this end?

We collect and process your name, email address, phone number, employer/company details, job position.

If you nevertheless have objections to this processing, you can exercise your rights to object as mentioned in point 10.3 of this statement.

4.3 Marketing communication

Your personal data are not used for direct marketing such as advertising campaign.

4.4 Profiling

Your personal data are not used for profiling purposes.

4.5 Cookies

Our website www.gantrex.com uses cookies, which are small text files stored on your device, and similar technologies. You can find more information about the use of cookies in our Cookie Policy.

5 Do we request your consent for processing?

Your personal data may only be lawfully used and processed by us if one of the following conditions is met:

- The use of your personal data is necessary to operate as a company of our legitimate interests, for the implementation of an agreement that you have concluded with us or, at your request, to take the necessary steps to conclude an agreement with us.
This forms the basis of the processing purposes stated in point 4.1 of this statement.
- We have your express and free consent to use your personal data for a particular purpose.
For example, we will request your permission to provide additional and optional services, as mentioned under point 4.2 of this statement.
- We may be required by law to process certain data and, in particular, to pass them on to the relevant authorities.

6 With which other persons do we share your personal data?

Only our employees who effectively need access to perform their duties have access to your data. These persons act under our supervision and responsibility.

We also call on external suppliers that carry out certain processing operations for us so that we can offer you our products and activities, such as, among other things, IT services, financial, accounting and similar other services. Since such third parties have access to personal data within the scope of the services we have requested. We have taken technical, organisational and contractual measures to ensure that your personal data are only processed and used for the purposes stated in point 4 of this Statement.

Only if We are legally obliged to do so can your personal data be provided to supervisory institutions, tax authorities and investigation services.

7 Where are the data stored and processed?

Your data will not be transported outside the EU and, in any case, we will ensure that the minimum legal requirements and security standards are respected at all times. If we suspect that your data will

be stored and processed outside the EU, we will explicitly inform you of this and ensure that the same level of protection is used as is applicable within the EU.

Apart from these cases, your personal data will never be transferred to or made available to third parties and will only be used for our purposes. Other companies can therefore not use your data, e.g. to send you advertising.

8 How long do we retain your personal data?

We only store your data for as long as this is necessary for the purposes for which the data are to be used as stated in point 3 of this Statement. Any deviations or clarifications of this principle are explicitly stated under the various purposes mentioned in item 4 of this Statement.

Since the need to retain data may vary by the type of data and by the purpose of the processing, the actual retention periods may vary considerably.

We can hereby inform you that We take the following criteria, among others, into account when determining the retention periods:

- How long are the personal data needed for the requested service to be provided?
- Have we established and announced a specific retention period?
- Have we been given permission for a longer retention period?
- Do we have a legal, contractual or similar obligation to retain the data?

As soon as your data are no longer required and we do not have a legal obligation to retain them, we will permanently erase them or, if this is not possible, anonymise them in our systems.

Your personal data will be retained and used for as long as necessary to comply with our legal obligations, to settle disputes or to enforce our agreements.

9 How do we protect your personal information?

Your personal data are considered to be strictly confidential. We take the appropriate technical and organisational measures to protect the provided and collected personal data from destruction, loss, unintended alteration, damage, accidental or unlawful access or any other unauthorised processing.

10 What are your rights?

10.1 The rights of access, rectification, erasure and transferability of data and of objection

- **The right to access your personal data**

You have the right at all times to access and inspect your personal data processed by us. We will provide you with a copy of your personal data in this connection free of charge if you so request.

To exercise your rights, please refer to point 10.2 of this Statement.

- **The right to rectify your personal data**

You have the right at any time to have incorrect, incomplete, inappropriate or outdated personal data erased or rectified.

To exercise your rights, please refer to point 10.2 of this Statement.

- **The right to withdraw your consent**

If the processing is based on your consent as set out in point 5.1., then you have the right to withdraw this consent at any time.

To exercise your rights, please refer to point 10.2 of this Statement.

- **The right to object to certain processing**

If your personal data are processed for statistical purposes, then you have the right to object to the processing of your personal data for reasons relating to your specific situation.

To exercise your rights, please refer to point 10.2 of this Statement.

- **The right to have Your personal data erased**

You are entitled to have your personal data deleted. Based on this, if you no longer wish to have a relationship with us you can ask us to stop using your personal data. However, we may keep personal data that are required for purposes of proof.

Under this right of erasure, you also have the right to ask us at any time to stop using your personal data that are processed on the basis of your consent or our legitimate interest. Due to legitimate interests, we may still continue to process your personal data after weighing your interests against ours, unless you decide to terminate your relationship with us.

To exercise your rights, please refer to point 10.2 of this Statement.

- **The right to transfer personal data**

With respect to the processing of your personal data based on your consent or because it is necessary in order to provide the requested products or services, you may ask us to forward your personal data to you - in a structured, commonly used and digital form - so that you can keep your data for personal (re)use, or to forward your data directly to another data controller, to the extent that this is technically feasible for us.

To exercise your rights, please refer to point 10.2 of this Statement.

- The right to limit certain processing operations

You may request that we limit the processing of your personal data in any of the following cases:

- if you dispute the accuracy of your personal data, you may request a limitation of its processing for a period that enables us to verify the accuracy of your personal data;
- if the processing is unlawful and you object to the erasure of the personal data and you request us instead to limit their use;
- if we no longer need your personal data for the processing purposes referred to in point 3, but you still need your data for the establishment, exercise or substantiation of a legal claim;
- if you objected to a processing operation, we will continue processing pending an answer to the question as to whether our legitimate grounds more heavily outweigh yours.

If you have obtained the right to have the processing of your data limited, we will no longer perform any operations with the personal data concerned, other than the storage of these data.

10.2 How you can exercise your rights

To exercise the rights mentioned above you may send us a written request:

- By email: privacy@gantrex.com

When exercising your right, we request that you clearly state the right to which you wish to appeal and any processing operation(s) you oppose or which consent you wish to withdraw.

10.3 Issues to consider when exercising rights

We wish to inform you that the objection to certain processing operation(s) or the withdrawal of your consent for certain processing operations involving your personal data may result in you no longer being informed of, or being able to use, activities or services that we offer.

11 How can you submit questions or complaints?

If you have a question or complaint about our processing of personal data please contact us through the following channels:

- By email: privacy@gantrex.com

If at any time you believe that GANTREX is infringing on your privacy, you have the right to lodge a complaint with the Belgian Data Protection Authority: Data Protection Authority, Rue de la Presse 35, 1000 Brussels, tel. +32 (0)2 274 48 00, e-mail: contact@apd-gba.be.

12 Amendments to this Statement

We may amend or supplement this Statement as we deem necessary.

If significant changes are made to this Statement the date of amendment of the Statement will be provided and we will also notify you accordingly and provide you with a copy of the amended Statement.

We also encourage you to review this Statement periodically to find out how we process and protect your personal data.