

# PRIVACY POLICY

Last revision on February 18<sup>th</sup>, 2019

## 1. GENERAL

VENN, with registered office at Mechelsesteenweg 277, 1800 Vilvoorde, Belgium, incorporated under Belgian law and registered with the Crossroad Bank of Enterprises under number BE 0555.735.368 (“VENN”, “we”, “us”), collects data when make use of VENN’s (customized) communication connections (the “**Services**”) and/or when you send us any communication (the “**Communications**”).

You may not always be aware of it, but using our Services and providing us with Communications implies sharing personal data. According to the legal definition, personal data means any information relating to an identified or an identifiable natural person (“**Personal Data**”). It is sufficient to be regarded as Personal Data if the data allows us to make a direct or indirect link between one or more data on the one hand and a natural person on the other hand.

We believe the protection of your privacy is very important and would like to provide clarity, and, hence, we have prepared this privacy policy (“**Privacy Policy**”). We will only use your Personal Data for the purposes stated in this Privacy Policy and we will not disclose your Personal Data to any natural person, legal person, or entity other than VENN and its affiliates (“**Third Party**”), unless as set out in section 5 of this Privacy Policy.

The collection and processing of Personal Data is subject to strict legal conditions to give you, as a user of our Services, and we guarantee that your Personal Data will not be publicly disclosed in an unauthorized manner.

Each processing will therefore always be done in compliance with the applicable privacy legislation, more specifically the European Regulation on the protection of personal data (the “**Privacy Legislation**”).

This Privacy Policy applies to the relationship between you and VENN. VENN will only process, store and use your Personal Data in accordance with this Privacy Policy and in accordance with the provisions of the Privacy Legislation.

We assume that you have read this Privacy Policy before using our Services or providing us with Communications, as well as given your consent to the collection and processing of the Personal Data by VENN in accordance with this Privacy Policy.

## 2. PERSONAL DATA THAT WE COLLECT

We may collect various types of Personal Data and keep it on our servers, including among others:

- First and last name;
- Office or residential address;
- Telephone number;
- E-mail address;
- Data on your use of the Services (e.g. browser and IP address); and
- Data of e-mails (e.g. number of times the e-mail was opened).

### **3. WHAT ARE THE PURPOSES OF DATA COLLECTION AND PROCESSING?**

Your Personal Data may be used for the following purposes (collectively, the “**Purpose**”):

- Providing you with access to the Services;
- To respond to your Communications;
- To improve our level of service;
- For our own administrative and quality assurance purposes.

Furthermore, VENN has free access to your Personal Data, and may freely save and publish your Personal Data in the following cases:

- to comply with applicable laws or regulations;
- if a law enforcement authority or other government agency so requests;
- to maintain its general Terms and Conditions;
- for investigating suspicious or fraudulent or illegal activities; and/or
- to protect security and/or your rights or VENN’s rights.

### **4. SECURITY OF YOUR PERSONAL DATA**

VENN shall take reasonable administrative, technical and organizational measures, in accordance with the applicable Privacy Legislation, against unauthorized or illegal processing of Personal Data or unintentional loss, destruction or damage, unauthorized or illegal access, disclosure or use of Personal Data. In some cases, your Personal Data will be shared with Third Parties, which must also take reasonable administrative, technical and organizational measures to protect the Personal Data.

Personal Data collected may be transferred to, stored and processed in your country of residence or any other country in which VENN (including its affiliates), subcontractors or agents maintain facilities,

including the United States and countries outside the European Economic Area (EEA). In the event that the Personal Data is transferred outside the European Economic Area, appropriate measures will be taken.

In the event and as a result of the discovery or notification of an infringement on the safety of the Personal Data, or access thereto by an unauthorized person, VENN is legally obliged to notify you, if the infringement is likely to violate your privacy.

## **5. NOTIFICATION TO THIRD PARTIES**

Unless otherwise specified in this Privacy Policy, we will not sell, rent or in other manner disclose your Personal Data to Third Parties, except in the event that the business of our Services or a part of it including the Personal Data connected with it is sold, assigned or transferred. Sometimes we use selected Third Parties to provide support services in connection with the Services or in the normal course of business. Such Third Parties may, from time to time, have access to your Personal Data to enable them to provide those services to VENN. We require all companies providing such support services to meet the same standards of data protection as our own. They are prohibited from using your Personal Data for their own purposes. For the avoidance of doubt, we do not allow these Third-Party service providers to use your Personal Data for their own marketing activities.

## **6. WHAT ARE MY RIGHTS AS A DATA SUBJECT?**

We want to guarantee a safe and lawful processing of Personal Data, and we assure you that your Personal Data will be processed in a straightforward and lawful way. This implies that the Personal Data will only be processed for the aforementioned, explicitly stated and legal Purpose. VENN furthermore assures that the Personal Data will always be processed in an adequate, relevant and non-excessive manner.

### **Right for information and access**

If you have questions or suggestions with regard to the processing of your Personal Data, and provided you are able to prove your identity, you have the right to request information and/or access to the Personal Data which is processed or held by VENN. We will then provide you with information and/or access to your Personal Data that we process as well as the source of these Personal Data.

### **Right of rectification and right of erasure**

You have the right to have your Personal Data rectified, erased or amended, free of charge, and to correct inaccuracies, in the event these Personal Data is incomplete or incorrect, or is being processed in an unlawful manner. You have the right to request the erasure of incorrect data or data that is not relevant in such manner.

You have the right to have your Personal Data erased without undue delay, free of charge, unless the Personal Data has to remain stored in accordance with a legal provision. The erasure is related to visibility, which entails the possibility that the erased Personal Data will remain stored temporarily. However, VENN will take any and all reasonable measures to erase all your Personal Data as fully and extensively as possible.

#### **Right of transferability of Personal Data**

You have the right to request your Personal Data in a structured format.

#### **Right to object or restrict the processing**

You can, at all times, object to the processing of your Personal Data, request to restrict the processing of your Personal Data and/or withdraw your consent given in accordance with the Privacy Policy.

#### **Right to Data Portability**

Within the limits set forth in the Privacy Legislation, you may request the portability of your Personal Data, *i.e.* by obtaining that the Personal Data you have provided to VENN will be returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format.

These rights may be exercised by contacting us Mechelsesteenweg 277, 1800 Vilvoorde, Belgium, Belgium.

#### **Right to file a complaint with the competent authority**

If you are not satisfied with the way we process your Personal Data, please let us know and we will investigate your concern using the above communication means. You also have the right to make a complaint to the competent data protection authority with the following contact details:

Privacy Commission/ Commission de la protection de la vie privée

Rue de la Presse 35, 1000 Bruxelles

02 274 48 00 of 02 274 48 79/ Fax: 02 274 48 35

<https://www.privacycomission.be/fr>

[commission@privacycommission.be](mailto:commission@privacycommission.be)

## **7. STORAGE AND REMOVAL OF DATA**

We may retain information regarding you and your use of the Website, including Personal Data, for as long as reasonably needed taking into consideration (i) our need to answer queries and resolve problems,

(ii) to provide you with improved and new services and (iii) to comply with legal requirements under applicable law(s). This also implies that we shall be entitled to retain your Personal Data until we receive your request to unsubscribe through an opt-out sent by e-mail at support@venntelecom.com or by writing to VENN, Mechelsesteenweg 277, 1800 Vilvoorde, Belgium. In any event we ensure that any and all of your Personal data will be deleted within thirty (30) calendar days following such opt-out request.

## **8. UPDATES OR CHANGES TO OUR PRIVACY POLICY**

If required, this Privacy Policy may be modified or updated to allow VENN to process your previously collected Personal Data for new purposes. In such case, you will be informed about this via a notification on our Website that the Privacy Policy has been amended and you will be requested to agree to this.

### **Responsible for processing:**

VENN, with registered office at Mechelsesteenweg 277, 1800 Vilvoorde, Belgium.