

## **Privacy policy with regard to the processing of personal data of customers, prospects and suppliers of HighCo Data**

*HighCo Data Benelux processes your data in a transparent manner in accordance with the provisions of the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data and - as from 25 May 2018 - the provisions of Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of said data (hereinafter referred to as "privacy legislation").*

### **Controller:**

**HighCo Data Benelux NV**, with registered office in 1730 Asse at Kruiskouter 1  
Brussels Register of Legal Entities – Company number: 0427.027.949  
Hereinafter referred to as "HighCo"

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### **1. To whom is this privacy policy addressed?**

This privacy policy applies to the processing of personal data of our customers (manufacturers and retailers), suppliers and prospects or persons who request information about HighCo's products and/or services.

This privacy policy also applies to the processing of personal data of former HighCo customers and suppliers.

### **2. What personal data do we process?**

#### **Categories of personal data the can be stored by us**

##### ***General information***

- *Name, first name, gender, language(s), function*
- *Postal address (or just postcode) telephone (fixed and/or mobile), e-mail, fax*
- *Company details: name, legal form, postal address, telephone (fixed and/or mobile), e-mail, fax, VAT number or company number, bank account number.*

As far as possible, we also record the date on which this data was communicated to us or on which a change to the data was made.

## **Specific information that relates to your contract**

If your company has concluded a contract with HighCo for the provision of products or services, then we also process the information that relates to the contract.

## ***Information stemming from external sources***

When you were contacted by HighCo within the context of marketing campaign and you have not personally communicated your personal data to HighCo, then it comes from external partners. HighCo may also use data from external partners to rectify or complement your personal data, either to keep its own database up to date, or to use for direct marketing purposes or for drawing up a marketing profile.

If you would like to know from which specific source HighCo has come into possession of your personal data, do not hesitate to contact us, according to the procedure set out above in this privacy policy.

## ***Recording of telephone conversations with our call center employees***

We can record the content of telephone conversations with our call center employees for the purpose of monitoring services provided and training call center employees.

## ***3. What do we use your personal data for and what is the legal basis for these processing operations?***

With your permission (legal basis: Art. 6a. of the privacy legislation)

- To be able to handle your question when you ask us questions via our website or our contact center. In this context, and always after you have been informed in advance, certain conversations with our contact center employees may be recorded. This in order to improve the quality of our services and to train our employees..
- In order to be able to send you the newsletters to which you subscribed
- To monitor the quality of the service provided by the call center that works on our behalf and for the training of call center employees.

In the context of a request for an offer or the performance of your contract (legal basis: Art. 6b. of the privacy legislation)

- For the carrying out, acceptance and follow-up of your order, general customer management, after-sales service and collection (including any assignment of claims to third parties).
- For accounting purposes
- For combating any fraud, infringements and crimes and for managing legal disputes and legal proceedings

In the context of our marketing activities, when we have a legitimate interest to do so. In this case, we always take care to maintain a balance between this legitimate interest and respect for your private life (legal basis: Art. 6f. of the privacy legislation).

- To inform you or to send you personalized offers, possibly on the basis of a profile analysis, via all possible channels
- To create customer profiles, centralize personal data, link them together and enrich them with useful information
- To process your participation in contests organised by us
- To improve our products or services, to inform you about new products or services
- To measure our performance (e.g. through market research)
- For the collection of statistical data and execution of market research, for financial purposes, management, marketing or reporting
- For combating any fraud, infringements and crimes and for managing legal disputes and legal proceedings

To comply with the statutory obligations which we are subject to (legal basis: Article 6c. of the privacy legislation):

In certain cases, statutory obligations, such as tax and accounting obligations, may require the processing, retention and/or transmission of data to the competent authorities.

#### **4. Cases in which your personal data may be disclosed to third parties**

**In the following cases, your personal data may be transmitted to third parties:**

- To our legal successors, if any, for the same purposes as stated in this privacy policy.
- To external companies, HighCo subcontractors, when we ask them to perform certain services on our behalf, such as cloud or other IT services, accountancy services, p other consultants who provide certain services for us .... In such a case, these third parties may only use your data within the strict limits of the instructions they receive from us and in accordance with this privacy policy.
- To certain government agencies within the context of compliance with legal obligations

#### ***Transfer of personal data outside the European Union***

Your personal data will not be passed on to recipients outside the European Economic Area.

#### **5. How long does HighCo retain your personal data?**

##### ***- Marketing en operational data:***

We retain your personal data for a maximum of 10 years from the date of termination of the last contract/contact with HighCo. However, you can always request us to delete your personal data from our database.

If you subsequently enter into a new contract/contact with HighCo, this 10 year period will start again from that date.

- ***Data recorded for the purpose of training our call center employees:***

This data is retained for a maximum of 30 days after recording and can only be used for this specific purpose.

## **6. How do we protect your personal data?**

HighCo makes every effort to protect your personal data as well as possible and to protect your privacy as much as possible. We take all necessary technical and organizational measures. For example, our network, our infrastructure and our IT systems are strictly secured. Only our employees who must have access to this information in order to be able to carry out their assignment are granted access to your personal data. Our employees are trained to handle personal data with care.

## **7. What rights do you have? How can you exercise these rights?**

### **Your right to access and rectification:**

Pursuant to the provisions of the privacy legislation, you have a right of access to your personal data. You also have the right to ask us to rectify inaccurate data about you or to supplement information.

### **Your right to object:**

Without needing to give reasons, you can always object, to the use of your personal data for direct marketing purposes (i.e. to send you promotional offers), as well as to its use for the creation of marketing profiles (i.e. to send you promotional offers that we consider to be the most interesting for you, based on your marketing profile)..

### **Your right to be forgotten, to restriction of processing and to transferability of your data:**

You have the right to request that your data be completely deleted from our database (right to be forgotten) in the cases provided for by law.

In case of dispute regarding the processing of your data, you may request to restrict its processing. Finally, you have the right to transferability of your data

### **Exercising your rights**

In order to exercise your rights, you must send us a written request. If we deem it appropriate, we may ask you to prove your identity (e.g. by providing us with a copy of your identity card).

You can send your request to the following address:

- By post : HighCo Data Benelux NV, Kruiskouter 1, 1730 Asse, attn: Privacy Controller (DPO)
- By e-mail : [dpo@highco.be](mailto:dpo@highco.be)

Requests sent to us by e-mail will also be answered by e-mail, unless otherwise requested by you.

In accordance with the provisions of the privacy legislation, we process your request within 30 days from the moment we receive all the elements that are required for processing your request. If your application is complex, this period can be extended by a maximum of 2 months, in which case you will be informed in advance.

For additional information regarding our privacy policy or complaints regarding the protection of your privacy, please contact our Privacy Officer at the above-mentioned address.

You can also always contact the Data Protection Authority (DPA), Rue de la Presse 35, 1000 Brussels, or by e-mail at [commission@privacycommission.be](mailto:commission@privacycommission.be).