

# PRIVACY STATEMENT OF PAPILIUM CVBA

This Privacy policy applies to any user of the website <https://papilium.com> and any of its sub-sites (hereinafter referred to as “the Website”) is provided by the limited partnership Papilium, with its registered office at 9830 Sint-Martens-Latem, Molenstraat, 2, registered on the crossroads bank for enterprises under number 0832.277.321. The cvba Papilium is the owner and administrator of the Website.

## Why a privacy policy?

Your privacy is of great importance to Papilium cvba. We therefore adhere to the privacy laws. This means that your data is safe with us and that we always use them correctly.

This privacy statement informs visitors of <https://papilium.com> about how we collect and process personal data.

What means that we intend to process personal data in a transparent manner, in accordance with the General Regulation.-(AVG / GDPR (General Data Protection Regulation)).

We pay particular attention to the protection of the private life of visitors and users of the website and therefore undertake to take all necessary, reasonable and within our possible measures to protect personal data against loss, theft, dissemination and any other unauthorized use.

'Personal information' refers to: all information about an identified or identifiable person; 'identifiable' means a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more elements characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

If the visitor / user wishes to respond to one or more of the following conditions, you can contact us at the following address: Molenstraat 2, 9830 Sint-Martens-Latem, or via the following e-mail address: [hello@papilium.com](mailto:hello@papilium.com)

This privacy statement applies to all information transferred to us through electronic means or as a result of a direct visit to our offices or contact with an employee on site. This information can be collected both by filling in the forms on our Website and via the information you provide us by email or directly following a visit.

Please note that when you contact us through another electronic medium (such as Facebook or Twitter), the privacy policy of those websites takes precedence in case of any conflict with this privacy statement.

## 1. Why personal data are processed

For all processing operations, we ask you, as a future or current customer of Papilium cvba, your consent to the processing of personal data or we process it when necessary for the execution of the agreement between you and Papilium cvba.

In case we obtain information from you through the Website, all processing of personal data will be done on the ground of the legal basis 'consent'. In-case we obtain information from you following an agreement you conclude with us, the processing ground for this information is then "the execution of a contract".

In some cases, other legal grounds may form the basis for the processing of personal data.

Below we explain the purposes of data processing as well as any personal data relating to this purpose.

We collect and process the following personal data for the following purposes:

### **1. To get in touch with you:**

Because you have filled out a contact form we need to be able to contact you. For this we process the following data:

- Your name
- Your e-mail address
- Your telephone number

### **2. In order to comply with a sales contract:**

We need information to meet our legal and contractual obligations. For this we process the following data:

- Your name and First Name
- Your address details
- Your telephone number your email address
- Your CBE number

### **3. For marketing purposes:**

In order to better tailor our services to the needs of our customers, we collect personal data. For marketing purposes we process:

- Localization data
- IP addresses
- Address data

## **New objectives**

We can use your data for new purposes, which are not yet provided in our privacy Policy. In that case, we will contact you by e-mail or through the website before using your data for these new purposes, to inform you of any changes to our privacy rules and to allow you to refuse your consent.

## **Statistics and profiling**

We keep statistics on the use of our website. With these statistics we improve our website to show only relevant information, for example. We can combine your personal data to

learn more about you. Of course we will respect your privacy at all times. If you don't want this, you can always report this to us.

For this we use the following data:

- Your IP address
- Your localization details
- A- ddress details

## **2. Who has access to your data?**

We have access to your data when this is necessary to perform a processing as described above.

We will not pass your data on to third parties without your consent.

Your data is stored on the hard drive to which access is restricted and the necessary technical and organisational measures have been taken to ensure safety. Persons who have access to site storage dates shall be bound by confidentiality.

We can share your information with the following parties:

- With our staff to carry out their assignment.
- With companies and external service providers associated with us that provide services or process data on our behalf, or for data centralization and / or logistical purposes. They only act as a processor and only use your data under our strict conditions. We concluded a processing agreement with each of them. They only act as processors, and use your data only under our strict conditions. We made a processing agreement with each of them.
- With suppliers, consultants, marketing partners and other service providers who need access to such information to work on our behalf. They, too, only act as processors, and thus use your data only under our strict conditions. We concluded a processing agreement with them.
- With the competent authority in response to a request for information if we believe that disclosure is in accordance with, or otherwise required by, any applicable laws or regulations or legal process.
- We will not transfer your data to processors outside the EEA (European Economic Area) without your explicit consent.

## **3. Advertising**

We would like to send you advertising about offers and new products or services. We do this in the following ways:

- by post
- by e-mail
- Through social media
- by telephone

You can object to this advertising at any time in the following way:

- Every letter says how to do that.
- Each e-mail contains a unsubscribe link.
- You can block us or use the unsubscribe option.
- You can indicate this when you get a call.

#### **4. Advertisements**

Our website does not display any general ads.

#### **5. Provision to other organizations or institutions**

We do not give your personal data to other companies or organizations, unless this is necessary for the proper functioning of the website except for the advertising of partners which you provide under the heading "provide data to other parties and partners" or when we are confronted with a legal obligation. An example is that when we suspect fraud, we can report it to the police.

#### **6. Cookies**

The cookies used on our website are session cookies and third-party cookies, and allow us to store and access information regarding the language, the type of browser used, and other general features used by the user and to track and analyze the activity that is being carried out to make improvements and deliver our services in a more efficient and personalized way.

Papilium cvba does not use advertising or behavioral advertising cookies.

The use of cookies offers advantages when offering services; it facilitates user navigation and access to the various services offered by this website; prevents the user from having to configure the predefined common features every time he visits the website it promotes the improvement of the functioning and services offered via this website, after the corresponding analysis of the information obtained through the installed cookies.

#### **Such cookies include:**

- user input cookies (session id): tracking user input when completing online forms;

- user interface to use cookies such as language preferences, for the duration of a session.

We use **strictly necessary cookies** that are essential to enable the user to use the Website and its functions, such as access to secure areas of the Website. They are generally used to identify the user as unique to other users currently viewing the Website. As well as to provide a consistent and accurate service to the user, for example by remembering previous actions (eg entered text) when returning to a page in the same session or maintaining tokens for the implementation of secure parts of the Website.

We use **performance cookies** to gather information about how visitors use a website, for example which pages visitors visit most often and whether they receive error messages from web pages. These cookies did not in principle contain information that identifies a visitor. All the information these cookies collect is aggregated and therefore anonymous. It is only used to improve the operation of a website. Can be used for webanalyses, response rates, error management

We use **targeting (marketing) cookies** to deliver ads that are relevant to the user. They are also used to measure the number of times the user sees an advertisement and the effectiveness of the advertisement campaign. They were present that users have a website - set up and sell surf injuries to find relevant ads for the user. Such cookies can also be used to increase functionality, such as videos in chess, sharing with social media, delivering car parks, etc.

For an overview of our cookies, see our cookie policy.

We ensure that the files and technologies that we use do not contain viruses or other harmful applications. These files and technologies are sometimes temporary (session cookies, these are deleted when you close the browser), sometimes permanent (persistent cookies, which remain until they expire or until you delete them) or sometimes both.

Some of these cookies, files and technologies are placed and managed by third parties and are, among other things, required to share information via social media and / or to enable certain applications on our applications. When third parties use such files and technologies via our website to collect, process and possibly enrich automated data, we are not responsible for this.

Some of the files and technologies used described here contain data that can identify you directly or indirectly. For more information and your rights with regard to the processing of personal data, please refer to the chapter on your rights.

Certain cookies cannot be disabled. Please note that deleting our cookies or turning off future cookies may prevent you from accessing certain areas or functions of our site.

You can also change the settings of your web browser to enable or disable cookies. Please note that if you use your browser settings to block all cookies, you may not be able to access parts of our Websites. These are the links to the cookie settings of the most popular browsers:

- Google Chrome \* Internet Explorer \* Mozilla
- Opera
- Safari
- Mobile app Safari

## **7. Security**

Security of personal data is very important to us. We ensure that your data is properly secured with us. Papilium cvba takes the appropriate technical and organizational measures to guarantee a level of security with regard to the processing of the collected data, in accordance with the risks that may arise with regard to the processing of the data and adapted to the nature of the data to be protected. given

Papilium cvba takes into account the state of knowledge, the costs and the nature, scope, context and purpose of the processing as well as the risks to the rights and freedoms of data subjects.

In the event that the personal data that Papilium cvba processes are violated, Papilium cvba will act quickly to find out the cause, limit the damage and remedy the situation.

Papilium cvba informs those involved when the law requires it to do so.

## **8. Changes to the Privacy Statement**

When our website changes, we must of course also adjust the privacy statement. So always pay attention to the date at the top and check regularly for new versions. We will do our best to announce changes separately.

## **9. Access to and changes to your data**

The General Data Protection Regulation provides you as a user of this website with a number of rights that may be invoked under certain conditions. Below you will find a list of these with a brief explanation.

## **10. What are your rights?**

The General Data Protection Regulation provides you as a user of this website with a number of rights that may be invoked under certain conditions. Below you will find a list of these with a brief explanation.

### **10.1. Right of access**

Right of access means first and foremost that we must inform you about what happens to your data and that we must describe your rights. You will find this under "what information do we collect and what do we use it for?"

In addition, we must provide you with a copy of your personal information upon your request. We have a month to do this unless this is (technically) impossible for us. You will receive a copy on simple request through one of the aforementioned channels. Please note that only the first copy is free. We reserve the right to request that you provide us with proof of your identity (to prevent us from passing on your personal data to other persons). We will send you the information by e-mail, unless you specifically request the information by mail or when an e-mail is not possible due to technical circumstances.

It is possible that certain documents may contain personal data of other persons who have the same protection as you. We therefore have to anonymize certain documents, which may take some time. We will always inform you if we cannot meet the request within a month

### **10.2. Right of rectification (right to correction)**

If we are in possession of incorrect or no longer up-to-date data, we will modify it on simple request. In case we ourselves suspect that your information is no longer up to date, we can contact you to verify this.

### **10.3. Right to erasure**

If you meet any of the criteria below, we will delete your data. Your email address and/ or phone number and/ or address and / or name will be kept on a blacklist so that our system will recognize that you do not wish to be contacted again.

Circumstances in which we can delete your data:

- We no longer process or need your data. You withdraw your consent for a processing that was based solely on consent.
- You invoke your right to appeal (see below).

- Your data has been processed unlawfully.
- There is a legal obligation to delete the data.
- Your information has been collected on the provision of services of the information society.

There are some specific situations where the request for deletion cannot be complied with. Most of these situations are common in our sector. The reasons for not being able to comply with your request are one of the following::

- For compliance with a legal obligation.
- For archiving, research or statistical purposes in accordance with Article 89 of the AVG.
- For establishing, exercising or defending legal claims.
- Processing is necessary to exercise the right to freedom of expression and information.

#### **10.4. Right to limitation of processing**

We will suspend or discontinue processing in case of that:

- We are in possession of incorrect data.
- When our processing is considered illegal.
- We do no longer need the data but you ask us to not erase them because you still need them.
- You object to the processing unless we consider to have compelling legitimate grounds that outweigh your interests, rights and freedoms. If you do not agree, we will suspend processing until this is clarified.

If the restriction of processing no longer exists, we will inform you of the reasons for canceling the restriction.

#### **10.5. Right of notification**

When you invoke the above-mentioned rights, with the exception of the right of access, we will pass this on to each recipient to whom the personal data has been provided, unless this proves impossible or involves disproportionate effort. We will inform you of those recipients at your request.

#### **10.6. Right to data portability**

All data that you have provided to us, that we process on the basis of permission and that we process by automated means, is sent on request to you or another controller (if



technically possible) in "readable format". This way we can hand over an Excel file of your data or transfer it to another party that you indicate.

### **10.7. Right to object**

When we process data on the basis of legitimate interest or on the basis of performing a task in the public interest, you may object. We will investigate your objection and continue processing only after investigation if we can prove that we have a legal reason to continue processing. You will be notified of the conclusion of the investigation.

If you object to direct marketing based on a legitimate interest, we will no longer send you direct marketing from the moment we receive your request.

## **11. Can you withdraw your permission?**

Yes, at any time you can withdraw your permission to process your data.

However, there are two exceptions.

1. If there is an other legal basis for the processing your data, we will still process your data within that legal basis.
2. Withdrawal of your consent cannot be used to avoid contractual obligations. If you withdraw your consent, it will only work towards the future and all previous processing will be considered legal. If the need to perform a contract is present, your data will be further processed on that basis.

You can withdraw your consent by contacting us through one of the contact details:

- Telephone: +32 475 71 11 24
- E-mail: [hello@papilium.com](mailto:hello@papilium.com)
- Address: Papilium cvba, 2 Molenstraat, 9830 Sint-Martens-Latem
- Website: <https://papilium.com>

## **12. To file a complaint**

If we were unable to handle your request in the best possible way, you are always entitled to complain to the Data Protection Authority.

This can be done via <https://www.dataprotectionauthority.be/>

## **13. Changes in our policies**

This privacy policy replaces all previous versions and applies from January 6, 2020. We reserve the right to change and/or update this policy at any time.