

## **Reacfin external privacy statement (website)**

This Privacy Statement describes how Reacfin SA with registered offices at 25 Place de l'Université, B-1348 Louvain-la-Neuve, company number 0862.986.729 processes your personal data.

Personal data is information that relates to an identified or identifiable natural person.

As a controller, we endeavour to process your personal data in compliance with the European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation or "GDPR").

### **How do we use your personal data?**

We collect personal data for the following purposes:

#### **1. Contact via our website**

We process the following personal data when you contact us via our website, only for the purpose of responding to your requests and communicating with you as follow-up:

- Identification data and contact details (surname, first name, e-mail address, professional information, telephone number)
- Personal characteristics (language)

The legal basis is contractual necessity, including follow-up of (precontractual) requests made by you. Personal data must be provided to enable us to respond to your request.

Unless a legal retention period applies, the data shall be retained for a period 3 years after the last meaningful contact between us and you.

#### **2. Client management**

We process the following personal data to provide our services to you, including when you subscribe/register to the e-learning services and webinars organized by Reacfin Academy:

- Identification data and contact details (surname, first name, address, professional information, telephone number)

- Financial data (for example, data relating to payment)
- Personal characteristics (language)

The personal data may be supplemented by information obtained through public sources (e.g. social networks, such as LinkedIn and “Banque-Carrefour des entreprises” database) and, where you work for a client, through your employer.

Unless stated otherwise, the legal basis is contractual necessity. Personal data must be provided to enable the performance of the contract.

Unless a legal retention period applies, data will be retained for a period of 10 years after the end of the contractual relationship.

### **3. Supplier management**

In the context of supplier management, we process the following personal data:

- Identification data and contact details (surname, first name, address, telephone number)
- Identity card or other identifying document
- Financial data (for example, data relating to payment)
- Personal characteristics (language)
- Data relating to occupation and career
- Data relating to education and training
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The personal data may be supplemented by information obtained through public sources (e.g. social networks, such as LinkedIn and “Banque-Carrefour des entreprises” database) and, where you work for a supplier, through your employer.

Unless stated otherwise, the legal basis is contractual necessity. Personal data must be provided to enable the performance of the contract.

Unless a legal retention period applies, data will be retained for a period of 10 years after the end of the contractual relationship.

### **4. Direct marketing**

For this purpose, we process the following personal data:

- Identification and contact details (surname, first name, professional information, e-mail address)

- Personal characteristics (language)
- Data relating to occupation and career (position, name of society)

The personal data may be supplemented by information obtained from public sources (e.g. social networks, such as LinkedIn).

If you are a client of Reacfin the legal basis is our legitimate interest (in particular freedom of entrepreneurship). If you are not a client of Reacfin, the legal basis is your consent.

Unless a legal retention period applies, the data shall be retained for a period 3 years after the last meaningful contact between us and you.

## **5. Improvement of our services (Google analytics)**

To improve our website and services, we use Google analytics to collect statistical information about the use of our website (to know for example how many people visit our website, which pages are more popular, or from which countries our users come from). For this purpose, we process the following personal data in joint controllership with Google:

- Personal characteristics (language, country)
- User behavior
- IP address

The legal basis is your consent.

The personal data shall be retained for a period of 14 months.

## **6. Legal obligations**

In the context of our legal obligations, we process the following personal data:

- Identification and contact details (surname, first name, address, telephone number)
- Financial data (for example, payment data)
- Identity card or other identifying document
- Data relating to occupation and career

The personal data may be supplemented by information obtained from public sources (e.g. social networks such as LinkedIn and “Banque-Carrefour des entreprises” database).

The legal basis is Reacfin’s legal obligation.

The personal data will be retained for the duration of the legal retention period.

### **Who are the recipients of your personal data?**

We might share your personal data with other recipients such as:

- Processors which provide us with services
- Google (Google Analytics for statistics on our website)
- National and European authorities when we are legally required to disclose personal data
- Banks, insurance companies and payment service providers
- Our professional advisers, such as accountants and lawyers

We do not transfer your personal data outside the European Economic Area.

### **What rights do you have regarding the processing of your personal data?**

According to the General Data Protection Regulation (GDPR), you have the rights:

- to access and receive a copy of your data;
- to rectify your data if it is inexact;
- to object to the processing for direct marketing purposes and for reasons related to your particular situation;
- to erase (“right to be forgotten”) or restrict your data;
- when the processing is based on consent, to retract your consent at any time;
- to data portability when the processing is based on consent or contractual obligation.

You have the right to lodge a complaint with the competent supervisory authority (for Belgium, this is the Belgian Data Protection Authority).

To exercise these rights, you must respect the conditions provided by the GDPR. Alternatively, to make things easier, you can contact us at the address below. In case of reasonable doubt about your identity, we reserve the right to ask for proof of identity.

### **Implementation of security measures**

According to the applicable law, we have implemented an adequate system of protection of your personal data. These measures include technical and organisational measures required

to protect your personal data against the accidental or unauthorised destruction, loss, alteration, unauthorized disclosure or access to your personal data.

Nevertheless, no security system can guaranty 100% of security. You also have a role to play regarding the security of your data, which may include (if relevant) protecting your user account data and choosing a strong password. We remain at your disposal should you have any questions relating to the confidentiality and the safety of your personal data.

### **How to contact us**

To exercise your data protection rights or if you have any question relating to the processing of your personal data, do not hesitate to send an email to [gdpr@reactfin.com](mailto:gdpr@reactfin.com) or to contact:

Reactfin SA  
25, place de l'Université  
B-1348 Louvain-la-Neuve

You may contact our data protection officer at the address above or at [gdpr@reactfin.com](mailto:gdpr@reactfin.com).

### **Updates**

Please note that we reserve the right to update this document from time to time.

This document was last updated on May 2020.