

This Data Protection Notice was drawn up by BelgaBrew.

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**DATA PROTECTION NOTICE**  
**BelgaBrew**

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**1. INTRODUCTION**

The head office name of BelgaBrew is Koen Avet & Co BVBA with registered office in Ingooigemplaats 68, 8570 Ingooigem (Belgium) and registered with the Crossroads Bank of Enterprises with enterprise number BE 0405 387 645 attaches great importance to the safe, transparent, confidential collection and processing of your personal data. In particulier, we want to protect the data from our customers, subcontractors and suppliers against loss, leaks, errors, unjustified accesses of unlawful processing.

Via this Data Protection Notice, we want to inform you about the collection and process of your personal data.

We use multiple cookies and we want to inform you by this Data Protection Notice about the collection and process of your personal data.

We urge you to read this Data Protection Notice carefully, as this contains important information about the process of your personal data and usage.

By providing us your personal data, you explicitly state that you have read this Data Protection Notice and clearly agree with this and also the process of it.

**2. FIELDS OF APPLICATION**

This Data Protection Notice concerns all services, that are provided by us and in generally all activities, that we execute.

**3. COMPANY RESPONSIBLE FOR PROCESSING AND ITS COMMITMENTS**

BelgaBrew, with its headquarters located in Ingooigemplaats 68, 8750 Ingooigem and with company number BE 0405 387 645, is responsible for processing your personal data.

When collecting and processing your personal data, we respect the Belgian law regarding protection of your personal data as well as General Data Protection Regulation ("GDPR") coming into force on 25<sup>th</sup> of May 2018.

**4. THE PERSONAL DATA**

As long as your activities and your relation with our company, you provide us the following personal data: your identity-and contact data (name, last name, title, address, e-mail address, telephone-and cell phone number). For certain specific legal obligations, it is possible that you will need to provide us additional data (such as E-ID-data, VAT-number, account number) and these are needed for customer- and order management (such as customer administration, follow up of orders/deliveries, invoicing,

follow up of the solvency, profiling (for example a subdivision in a certain sector and certain sectors of which the data are irrelevant, are therefore erased) and by submitting of marketing and personalised publicity.

We kindly point out that you bear the responsibility for all the data that you provide us and we trust that the data is correct. If your data is not up-to-date anymore, we urge you to inform us about this.

You are not obliged to provide us your personal data, however you do understand that it will be impossible for us to provide certain services or to cooperate when you do not agree with the collection and processing of it.

## **5. PROCESSING PURPOSES AND LEGAL BASES**

### **5.1 Customer data**

In the context of our service and our activities, we collect and process the identity- and contact data, account numbers, VAT-numbers of our customers, their staff, employees, appointees and other useful contact persons. The purposes for the processing are the completion of our agreements with our customers, customer management, the accountancy and direct marketing activities such as sending promotional or commercial information. The legal bases are the completion of an agreement, the fulfilment of legal and regulatory obligations and/or justified importance.

### **5.2 Data from suppliers and subcontractors**

We collect and process the identity- and contact data, bank accounts and VAT-numbers from our suppliers and subcontractors, just as their possible (sub)contractor(s), their personnel, employees, appointees and other useful contact persons. The purposes of these processing operations are the completion of these agreements, the management of the suppliers/subcontractors, the accountancy and direct marketing activities like sending of promotional or commercial information. The legal bases are the completion of the agreement, the fulfilment of legal and regulatory requirements and/or our legitimate interest (such as direct marketing). Permission will always be asked when sending direct marketing activities via e-mail (such as a newsletter or an invitation for events), this can always be withdrawn.

### **5.3 Data from employees**

We process the personal data from our employees in the context of our human resources management and payroll administration. In view of its specific nature, this processing is more extensively regulated in a Data Protection Policy for Employees.

### **5.4 Other Data**

In addition of the data of customers, suppliers/subcontractors and staff, we also process the personal data from others, such as possible new customers/prospects, useful contacts within our sector, network contacts, contacts of experts, etc. The purposes of these processing operations are in the interest of our activities, direct marketing and public relations. The legal basis is our legitimate interest or in some cases

the execution of an agreement.

## 6. DURATION OF THE PROCESSING

The personal data is stored by us and processed for a period that is necessary in function of the purposes of the processing and in function of the (whether or not contractual) relationship that we have with you.

Customer data and data from suppliers or subcontractors will be in any case be removed from our system after a period of 10 years after the termination of the agreement or the project, except for these personal data that we have to keep for a longer period of time on the basis of specific legislation or case of an ongoing dispute for which the personal data are still necessary.

## 7. RIGHTS

In accordance with and under the terms of the Belgian privacy legislation and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- Right of access and inspection: you have the right to take cognizance of the data that we have about you free of charge and to determine what it is used for.
- Right of rectification: you have the right to obtain rectification (correction) of your incorrect personal data, as well as to complete incomplete personal data.
- Right of data change or restriction: you have the right to request that we delete your personal data or limit its processing in the circumstances and under the conditions as determined by the General Data Protection Regulation. We can refuse the data change or limitation of any personal data that is necessary to perform a legal obligation, the execution of the agreement or our legitimate interest, and this as long as this information is necessary for the purposes for which it was collected.
- Right to transfer data: you have the right to obtain the personal data you have provided us in a structured, standard and machine-readable form. You have the right to transfer this data to another person responsible for the processing.
- Right of objection: you have the right to object to the processing of your personal data for serious and legitimate reasons. Please note, that you cannot oppose the processing of the personal data that is necessary for us to perform a legal obligation, the execution of the agreement or our legitimate interest, and this as long as this information is necessary for the purposes for which they were collected.
- Right of withdrawal of consent: If the processing of the personal data is based on previous consent, you have the right to withdraw this permission. These personal data will then only be processed if we have a different legal basis for this.
- Automatic decisions and profiling: we can confirm that the processing of personal data does not include profiling and that you are not subjected to fully automated decisions. You can exercise

You can exercise the above mentioned rights by contacting the company BelgaBrew. The contact person for this is: Mr Koen Avet with contact details: +32(0)56 77 72 86.

We do our utmost to handle your personal data in a careful and legitimate manner in accordance with the applicable regulations. If, nevertheless, you are of the opinion that your rights have been violated and you did not comply with your concerns within our company, you are free to file a complaint with:

Commission for the Protection of Privacy  
Drukpersstraat 35  
1000 Brussels  
Tel. +32(0)2 274 48 00  
Fax. +32(0)2 274 48 35  
E-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)

You can also turn to a court if you believe that you have suffered damage as a result of the processing of your personal data.

## **8. TRANSFER TO THIRD PARTIES**

Certain personal data collected by us will be transferred to and possibly processed by third-party service providers, such as our IT supplier, accountant, auditor, as well as by government (for example customs formalities).

It is possible that one or more of the above-mentioned third parties are located outside the European Economic Area ("EEA"). However, only personal data will be transferred to third countries with an appropriate level of protection.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialist service providers appointed by them must respect the confidential nature of your personal data and can only use this data for the purposes in which they were provided.

If necessary, your personal data can be passed on to other third parties. This can be the case, for example, if we were reorganized in whole or in part, if our activities were passed on or if we were declared bankrupt. It is possible that personal data must be passed on pursuant to a court order or to comply with a specific legal obligation. In that case, we will make reasonable efforts to inform you in advance about this communication to other third parties. However, you will recognize and understand that in certain circumstances this is not always technically or commercially feasible or that legal restrictions apply.

We will under no circumstances sell your personal data or make it commercially available to direct marketing agencies or similar service providers, unless with your prior consent.

## **9. TECHNICAL AND ORGANIZATIONAL MEASURES**

We take the necessary technical and organizational measures to process your personal data according to an adequate level of security and to protect against destruction, loss, forgery, modification, unauthorized access or notification by mistake to third parties, as well as any other unauthorized processing of this data.

In no case can the company BelgaBrew be held liable for any direct or indirect damage resulting from incorrect or unlawful use by a third party of the personal data.

#### 10. **INTELLECTUAL PROPERTY RIGHTS**

The website of BelgaBrew, complete content, function and functionality of that website (such as text, pictures, video, brand names, audio and design) are property of the designer "Stijn Avet" of BelgaBrew and are protected by other proprietary rights and copyrights.

You can use the website of BelgaBrew for your purposes in accordance with our terms. It is allowed to take copies from our website for personal use with the approval from us. Without the approval in writing from us, you cannot take a single copy from our website for other purposes.

#### 11. **INDEMNIFICATION**

We cannot guarantee that our website will run flawlessly and continuously. We are not responsible for damage by electronic means of communication, by slow and delayed delivery or by persons or computer programs that are used for electronic communication or transfer of viruses.

Although our website was made with the utmost attention and care, it is possible that certain characteristics of the products (such as product appearances or product information) are presented or displayed incorrectly. Therefore only the characteristics on the packaging of the product apply.

#### 12. **ACCESS BY THIRD PARTIES**

With a view to the processing of your personal data, we grant access to your personal data to our employees, employees and appointees. We guarantee a similar level of protection by making contractual obligations enforceable against these employees and appointees, which are similar to this Data Protection Notice.

#### 13. **ANY QUESTIONS?**

If after reading this Data Protection Notice you have further questions or remarks regarding the collection and processing of your personal data, you can contact the company BelgaBrew by post to Ingooigemplaats 68, 8570 Ingooigem (Belgium) or by e-mail via the contact form on the website [www.belgabrew.com](http://www.belgabrew.com) or by phone +32(0)56 77 72 86.