

# PRIVACY STATEMENT – Van Eenoo

# Version 24/12/2022

The website <u>www.v1o.law</u> (hereinafter: the "Website") is offered by:

Dominique Van Eenoo BV (hereinafter: **"Van Eenoo**", **"We**" and **"Us**") Torhoutsestraat 307 8020 Ruddervoorde Belgium VAT BE 0525.829.377

E-mail: <u>dominique@v1o.law</u> Mobile (WhatsApp): +32 (0) 485 81 57 49

#### 1 WHY THIS PRIVACY STATEMENT?

Every person who visits the Website (hereinafter the "Visitor") as well as anyone who uses our services (hereinafter the "Client"), almost inevitably discloses certain personal data. This personal data constitutes information that allows us to identify you as a natural person, regardless of whether we actually do so. You are identifiable as soon as it is possible to create a direct or indirect link between one or more personal data and you as a natural person. The Visitor and the Client are hereinafter also referred to jointly as the "Data Subject".

We use and process your personal data in accordance with the GDPR (General Data Protection Regulation) and other relevant legal provisions. Any reference in this Privacy Statement to the GDPR is a reference to the Regulation of the 27<sup>th</sup> of April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), which entered into force on the 25the of May 2018.

Through this Privacy Statement, each Data Subject is informed of the processing activities that Van Eenoo can carry out with his personal data. Van Eenoo reserves the right to amend this Privacy Statement at any time. Any substantial change will be clearly reported to the Data Subject. We advise the Data Subject to consult this document regularly on the website.

# **BV Dominique Van Eenoo**

Torhoutsestraat 307, 8020 Ruddervoorde



#### 2 WHO PROCESSES YOUR PERSONAL DATA?

#### 2.1. The Processing Officer

Van Eenoo determines alone or in cooperation with others which personal data are collected, as well as the purpose and means for the processing of this personal data. Consequently, Van Eenoo is a "Processing Officer" within the meaning of the GDPR.

Van Eenoo has taken appropriate technical, organizational and legal measures to protect the personal data of its Visitors and clients. Van Eenoo uses various adequate security technologies and procedures to protect your personal data from unauthorized access, use or disclosure. Van Eenoo ensures that the personal data provided is stored securely in a controlled environment.

In addition, the office of Van Eenoo is insured for damage as a result of cybercrime and its own mistakes that violate the GDPR (cyber insurance). And this amounting to EUR 200.000.

And this via the company AIG Europe Limited via Van Breda Risk and Benefits with policy number BFCE 000432, located at Pleinlaan 11, 1050 Brussels.

# 2.2. Processor(s)

Van Eenoo uses carefully selected "data processors" for the processing of the personal data of Visitors and Clients. A processor is a natural or legal person who processes personal data at the request of or on behalf of the processing officer. The processor is obliged to ensure the security and confidentiality of the personal data. The processor always acts according to the instructions of the processing officer.

Van Eenoo uses the following categories of "processors":

- Companies that we have engaged for ICT technical support and hosting purposes; Combell and Wix
- Companies that we have engaged for administrative purposes (e.g. CRM system); Repstor
- Companies that we have engaged for communication purposes (e.g. live chat on the website); WhatsApp; MS Office 365 with Teams and e-mail, Vectera online platform, Doc Send
- Companies we have engaged for payment purposes, Stripe and accounting firm Frank Lagae

In order to optimally protect the personal data of the Data Subjects, Van Eenoo has made the necessary contractual arrangements with the aforementioned data processors to ensure that they apply the same high standards as Van Eenoo, without Us being held somewhat responsible.



A transfer of personal data to a processor outside the European Economic Area (EEA) can only take place to countries of which the Data Protection Authority in Belgium (GBA) has determined that they offer the same adequate level of protection or, if this would not be the case, insofar as Van Eenoo has made the necessary contractual agreements with this processor, taking into account the standard provisions as imposed by the Data Protection Authority in Belgium.

# 3 ON WHAT LEGAL BASIS ARE YOUR PERSONAL DATA PROCESSED?

In accordance with the GDPR, we process personal data on the basis of the following legal grounds:

- On the basis of the execution of the agreement as agreed with the client, or the exercise of precontractual steps taken at the request of the Data Subject;
- On the basis of compliance with legal or regulatory provisions, relating to the management of the contractual relationship with the client, in particular invoicing;
- On the basis of our legitimate interest in responding to information requests from Visitors and Clients;

# 4 WHICH PERSONAL DATA ARE PROCESSED?

Van Eenoo commits to collect and process only those personal data that are relevant and necessary for the purposes for which they are processed.

How much and which personal data Van Eenoo collects about you depends on your use of the Website and/or our services and only with your explicit consent. The collection of personal data is further expanded as more intensive use is made of our Website and our services. In general, clients will disclose more personal data than Visitors. Specifically, we process the following categories of personal data:

# Category 1 - Classic personal data such as:

- Personal identification data: (surname, first name, address, national register number or passport number, driving license number, retirement number, etc.)
- Genetic data: (gender, age, date and place of birth, marital status, nationality, etc.).
- Digital or technical contact details: (phone number, WhatsApp number, email address, cookies and IP address);
- Financial identification data: (bank account numbers under money laundering legislation, income, assets, total income, professional income, savings, debts, expenses and benefits, etc.)

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IBAN of our Office BE17 0016 9200 2221 IBAN of Third Parties (Escrow) BE36 0016 9556 8181



The personal data under the aforementioned Category 1 may be collected partially or in full when a Client or a Visitor visits our Website and/or possibly fills in the contact form and/or at our request at a later date.

After all, both the Client and the Visitor have the opportunity to consult and accept or refuse our Cookie Policy, Privacy Statement, Disclaimer, General Information and General Terms and Conditions.

# Category 2 - Special categories of personal data such as:

- Racial or ethnic origin
- Political affiliation
- Religious or philosophical preference
- Memberships of associations, trade unions, charitable or voluntary organizations, clubs, groups, etc.
- Genetic data (gender, age, date and place of birth, marital status, nationality, etc.).
- Biometric data for identification purposes (such as copy of electronic identity card, photo, any fingerprints and any DNA data).
- Data on health (in particular on physical and mental health with regard to the medical file, medical report, diagnosis information, treatment, analysis result, disability or disability, diet, etc. as well as the data on the care for this (data on the means and procedures used for the (para)medical patient approach, etc.).
- Data relating to sexual behavior or sexual orientation.
- Judicial data (suspicions and indictments, convictions and penalties, judicial measures, such as guardianship, provisional administrator, internment, placement, etc. as well as administrative sanctions).
- Data relating to education and training (academic curriculum with an overview of the schools, institutions, universities visited, type of courses taken, diplomas envisaged, examination results, other diplomas obtained, professional competence on the basis of certificates and vocational training, special licenses, etc., and professional experience such as professional interests, research interest, academic interests, etc.).
- Data relating to occupation and employment (current employment, termination of employment, career, etc.)

The personal data under the aforementioned Category 2 may be collected partially or in full when a Client or a Visitor fills in the contact form and/or at our request at a later date.

After all, both the Client and the Visitor have the opportunity to consult and accept or refuse our Cookie Policy, Privacy Statement, Disclaimer, General Information and General Terms and Conditions.



#### 5 WHY WE COLLECT YOUR PERSONAL DATA?

All personal data will only be used for the following purposes, in particular for legal advice and assistance.

The processing of your personal data is essential for the proper functioning of the Website and for the related services. In accordance with the GDPR, this corresponds to "Legitimate interest of the processing officer". The collection of personal data is further expanded as the Data Subject makes more intensive use of our Website and our services.

The processing takes place exclusively for the following specific purposes:

- Clients:
  - Professional contacts in person or by telephone, e-mail, via a social platform or via our contact form on our website
  - Legal assistance
  - Personalized or general targeting and follow-up communication. In this case, the Client always has the right to unsubscribe from it.

#### - Visitors:

- Answering requests for information via the contact form on the Website;
- Personalized or general targeting and follow-up communication. In this case, the Visitor, who has given his explicit permission, always has the right to unsubscribe or withdraw his consent.

Furthermore, the personal data of Clients and Visitors can also be used for the following purposes:

- Dispute management.
- Protection against fraud and violations.

In addition, we use cookies to recognize (the IP address of) Visitors and to offer them a personal user experience, to remember their technical choices and to detect and correct any errors on the Website. Please see our <u>Cookie</u> <u>Policy via this link</u> for more information on how we use cookies.

When visiting the Website, some data is collected for statistical purposes. Such data is necessary to optimize the use of our Website. These data are: probable place of consultation, time and day of consultation, which pages were visited, etc. In order to optimally protect your privacy, this data is always anonymized.



The Data Subject always provides the personal data himself to Van Eenoo and can thus exercise a certain control. Van Eenoo reserves the right to suspend or cancel certain operations if the required personal data are missing, incorrect or incomplete.

# 6 WHO RECEIVES YOUR PERSONAL DATA?

Your personal data will only be processed for internal use within Van Eenoo. Your personal data will not be sold, transferred or communicated to third parties, unless you have given us your explicit permission in advance or if the transfer is necessary for the execution of the agreement or is legally required.

The transfer of data to third parties only takes place as legally defined, but is not limited to:

- Immigration Office
- Commissioner General for Refugees and Stateless Persons
- Guardianship Service
- Department of Economic Migration
- Local authorities
- Belgian Diplomatic Missions and Consular Posts abroad
- Federal, Community or Regional Public Services
- Justice, Police, Intelligence Services
- Social Security Authorities
- Social assistants
- The employer of the person concerned
- Office for Legal Assistance
- Interpreters/translators
- Court bailiffs or notaries
- Family of the person concerned
- The Bar Association
- Doctors
- Guardians

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#### 7 HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Some personal data is kept for 7 years for as long as this is necessary to pursue the stated goals. They will be removed from our database when they are no longer necessary to pursue these purposes or if the Data Subject exercises his/her right to delete the personal data in a valid manner.

# 8 WHAT ARE YOUR RIGHTS?

# 8.1 Guarantee of lawful and secure processing of personal data

Your personal data will always be processed for legitimate purposes, as set out in Article 5. They are collected and processed in an appropriate, relevant and proportionate manner, and are not kept for longer than 7 years than necessary to achieve the intended purposes.

# 8.2 Right of access and copy

If you can prove your identity, you acquire the right to obtain information about the processing of your personal data. Thus, you have the right to access the purposes of the processing, the categories of personal data, the categories of recipients to whom the personal data are sent, the criteria that determine the period of data retention and the rights you can exercise with regard to your personal data.

# 8.3 Right to rectification of personal data

Inaccurate or incomplete information can be corrected. It is first and foremost the responsibility of the User to provide Van Eenoo with the correct information. You can also contact us with a request for change.

# 8.4 Right to erasure of your personal data

You also have the right to obtain the erasure of your personal data in the following cases:

- Your personal data are no longer necessary for the intended purpose;
- You revoke your consent to the processing of your personal data and there is no other legal basis for processing your personal data;
- You have lawfully lodged an objection to the processing of your personal data;
- Your personal data are processed unlawfully;
- Your personal data must be deleted on the basis of a legal obligation.

The erasure of personal data is mainly related to visibility; it is possible that the deleted personal data will remain temporarily stored.

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# 8.5 Right to restriction of processing

In some cases, you have the right to request restrictions on the processing of your personal data. This certainly applies in the event of a dispute regarding the accuracy of personal data, if the personal data are necessary in the context of legal proceedings or during the time necessary for Van Eenoo to determine that you can validly exercise your right to erasure.

# 8.6 Right to object

You have the right to object at any time to the processing of your personal data for 'direct marketing' purposes, profiling purposes or purposes arising from the legitimate interests of the processing officer. Van Eenoo will stop processing your personal data unless Van Eenoo can demonstrate that there are compelling legal reasons to process your personal data that override your right to object.

# 8.7 Right to data portability

You have the right to obtain the personal data provided to Van Eenoo in a structured, common and machinereadable form. In addition, you have the right to transfer this personal data to another processing officer, unless this is technically impossible.

# 8.8 Right to withdraw your consent

You have the right to withdraw your consent at any time, for example if you have given it as a Visitor for direct marketing purposes.

# 9 How to exercise your rights?

If you wish to exercise your rights, you must send a written request and proof of identity by registered letter to Van Eenoo, Torhoutsestraat 307, 8020 Ruddervoorde or by e-mail to <u>dominique@v10.law</u>. We will respond as soon as possible, no later than one (1) month after receiving your request. This period can be extended by 2 months if it concerns a complex request.

# 10 POSSIBILITY TO SUBMIT A COMPLAINT

If you have any comments or complaints about the way in which we handle your personal data, we ask you to report them to us first. In this way we can come to an amicable solution in mutual consultation.



If, after this notification, you are still not satisfied with the processing of your personal data by Van Eenoo, you have the right to file a complaint with the competent supervisory authority (for Belgium it is the Data Protection Authority: see: <u>https://www.gegevensbeschermingsautoriteit.be/)</u>:

Drukpersstraat 35, 1000 Brussels

Tel.: +32 227 44 800

contact@apd-gba.be

You can also bring civil proceedings against Us in court.

Criminal sanctions are also possible, and this after complaint to the police, public prosecutor's office or the investigating judge.

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