



## **PRIVACY POLICY**

In the context of our business activities, including the operation of our website, we process personal data about the visitors of our website (<http://www.innovad-global.be>), and we are committed to protecting those personal data and maintaining the accuracy, confidentiality, and integrity thereof.

This data protection and privacy policy explains:

- who we are;
- what personal data we collect and how we process it; and
- our online information practices.

You will also find herein all relevant information about your rights and how to exercise these rights.

### **1. WHO ARE WE?**

We are **Innov Ad NV/SA**, a limited liability company incorporated under Belgian law with registered office in 2910 Essen, Postbaan 69, and registered with the Crossroads Bank for Enterprises under number 0831.523.491.

We are the data controller in relation to the personal data processed in accordance with this policy.

Our contact details are:

Postbaan 69  
2910 Essen  
Belgium

Contact: J Braes  
Phone: +32(0)36700500  
Email: [data-protection@innovad-global.com](mailto:data-protection@innovad-global.com)

## **2. COLLECTION OF PERSONAL DATA**

### **2.1 What categories of personal data do we collect?**

We collect the following categories of personal data from you and about you:

- your domain name but not your full e-mail address if you visit our website;
- your e-mail address if you provide it to us directly or by communicating this to us in any way or if you follow us on social media;
- all navigation and web search information concerning pages from other websites through which you had browsed or had been redirected to in order to arrive at our website; and
- all information that you voluntarily provide to us.

## **2.2 How do we collect personal data about you?**

Personal data is collected either (i) directly (through you when you provide us with your personal data) or (ii) indirectly (through our collection of your personal data when you use our website). When you use our website, our webserver will automatically recognize your internet domain name and, if possible, your e-mail address. But as mentioned in section 3.1 above, we collect the data on the domain name of your e-mail address only but not your full e-mail address.

Through our website, we do not seek to collect personal data pertaining to your racial or ethnic origin, political opinions, religious or philosophical beliefs or membership of a trade union. If we wish to collect such types of personal data, we will seek your prior consent hereto.

## **3. PROCESSING OF YOUR PERSONAL DATA**

### **3.1 For what purposes of and on the basis of what legal grounds do we process personal data?**

#### **3.1.1 The purposes and legal grounds that apply now**

We process your personal data for the following purposes:

- to handle your enquiry and to contact you (by e-mail or otherwise);
- to help us understand your needs and interests better so that we can serve you better;
- to help you and us complete a transaction or order you placed with us;
- to provide you with other relevant information from time to time;
- to conduct an analysis on website visitor;
- to increase the functions and user-friendliness of our website and to improve the design, content, and user experience thereof;
- to conduct research such as analyzing how visitors use and navigate our website, etc.; and
- to protect our legitimate interests.

We will not use your personal data for purposes other than those listed above for which you provided the data to us. This means we will not send you information about our products, services, promotions, events unless you request that we send those information to you.

In addition, in the event you no longer wish to receive information that you previously requested, you may opt out by contacting us at [data-protection@innovad-global.com](mailto:data-protection@innovad-global.com)

Also, we can make your personally identifiable data not personally identifiable, either by aggregating your information with information about other persons, or by de-personalizing it by removing certain elements, such as your name, that could indicate your identity. Given the nature of this information, there are no restrictions under this policy on our right to aggregate or de-personalize your personal data and to use and/or share with third parties the resulting non-personally identifiable information in any way.

We process personal data only with your consent or for the purposes of our legitimate interests.

#### **3.1.2 Future purposes**

If we consider processing your personal data for other purposes than those mentioned under 3.1.1, we will inform you thereof before we start processing your personal data for the new purpose.

### **3.2 How long will your Personal Data be retained?**

Your personal data will be retained for a maximum of 3 years after your last action (inquiry, request, transaction, ...) on our website.

### **3.3 To whom will your Personal Data be disclosed?**

Your personal data may be accessed for the purposes outlined above - only if it is necessary - within the company by these individuals:

- the general manager; and
- the members of staff who need to obtain access to your personal data for the purposes outlined above.

And if necessary, your personal data may be accessed for the abovementioned purposes by other companies of the group.

We do not sell or rent your personal data to third parties.

We do not disclose your personal data to third parties except to companies that are affiliated with us and/or to unaffiliated third parties working on our behalf, for us, or with us, but only for the purpose listed above.

All of those affiliated and unaffiliated parties, which have access to your personal data, are required to keep your personal data confidential and may not use it for any purpose other than to carry out the services they are performing for us (which are services pertaining to the purposes listed above) or otherwise required by law.

Unless otherwise stated in this policy, we will not disclose your personal data to third parties without your permission unless the disclosure is to (i) comply with any law, orders from authorities or a court order; (ii) respond to requests from governmental authorities; or (iii) help prevent fraud or to protect the safety, rights, property or security of us or third parties.

## **4. LINKS TO THIRD-PARTY WEBSITES**

While using our website, you could encounter links to third-party websites. Please note that such third-party websites are not related to us, and we assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third-party websites. We encourage you to read the privacy policies and the terms and conditions of such websites carefully.

## **5. OUR COMMITMENT TO INFORMATION SECURITY**

Information security is important to us. Therefore, we undertake physical, electronic, and administrative measures and safeguards and review them periodically to protect your personal data from unauthorized or inappropriate access and use.

## **6. YOUR RIGHTS**

### **6.1 What are your rights with regard to data processing?**

You have the right to request:

- access to your personal data at any time;
- that inaccurate, outdated, or no longer necessary information be corrected, erased, or restricted; and

- in certain circumstances, the erasure of your personal data, especially if the personal data concerned have been collected directly from you and that those personal data are no longer necessary for the purpose for which we collected it, the processing of the personal data concerned was based on your prior consent and you have withdrawn such consent or if you object to the processing of the personal data.

If we are processing personal data relating to you based on your prior consent, you may withdraw your consent at any time.

You may object to the processing of your data at any time on condition that your objection is justified on your own grounds, and such justification is within the limits of applicable data protection regulations.

If you object to the processing of your personal data, or if you challenge the legality of the processing of your personal data or the accuracy of your personal data, you may request that we restrict the processing of your personal data for the time necessary for us to verify the basis of your request.

You may also request such restriction if the processing of your personal data is considered illegal but you do not want your personal data to be deleted.

## **6.2 How can you exercise your rights?**

You can exercise the rights described above by:

- sending an email to [data-protection@innovad-global.com](mailto:data-protection@innovad-global.com)
- sending us a letter to the address above (see 2.).

Upon receipt of your request, we will answer you as soon as possible.

If you are not satisfied with our response to your request with regard to your exercise of those rights, you may file a complaint with the data protection authority in the country where you have your habitual residence, your place of work or where the alleged infringement of your rights occurred.

## **7. CHANGES TO THIS POLICY IN THE FUTURE**

We might bring changes to this policy from time to time in order to comply with any changes in the applicable laws, regulations and practices, as well as to reflect possible changes in the way we collect and process personal data.

Any changes we make to this policy will be posted on our website and, if appropriate, you will be notified about them by e-mail.

We encourage you to check our website regularly to see if any updates or changes have been made to this policy.

## **8. HOW TO CONTACT US**

If you have any questions about this policy, your personal data or the processing thereof, or if you have concerns about a potential data breach by us, you can contact us via e-mail [data-protection@innovad-global.com](mailto:data-protection@innovad-global.com)