## **ACCIRCULATE - PRIVACY POLICY**

Accirculate SPRL, having its registered office at Avenue de Hinnisdael, 14B, Woluwe-Saint-Pierre 1150, company number 0719.715.848 (the "Company") is a strong advocate of data privacy. We recognize and value the trust that individuals place in us when they provide personal information and are committed to maintaining the privacy and security of that information.

# 1. Purpose of the Privacy Policy

This privacy policy ("Privacy Policy") sets out our approach to the personal data that we collect from you, or that has been collected about you from a third party, and the purposes for which we process your personal information.

This Privacy Policy informs you of the nature of the personal information we process and how you can request the deletion, update, transfer or access to that personal data.

#### 2. How to Contact Us

If you have any questions about this Privacy Policy or wish to exercise any of the rights set forth herein, please contact us at the following coordinates:

- By email at: <a href="mailto:info@accirculate.com">info@accirculate.com</a>

## 3. What personal data we collect

We may collect and process various types of personal data in the course of operating our business and providing our services. This data includes:

- First and last name:
- E-mail address;
- Address;
- Company, business division, department;
- Title, Role and Responsibility;
- Phone number, social media;

# 4. Purpose of processing

We process personal data to answer requests, send communications, exchange information, to negotiate or conclude contracts and subsequent services and solutions provision. We process this personal data only when you, the data subject, enter into contact with us for any given purpose.

This processing will generally be based on the following legal bases, depending on the exact circumstances and quality of the person contacting us: i) performance of performance of a contract the data subject is party to or measures to conclude such a contract (6.1.b of the GDPR), and/or ii) Accirculate or the client's legitimate interests to carry out its business activities, conclude agreements, and generally respond to direct requests (6.1.f of the GDPR).

#### 5. Cookies

We do not collect any personal data information about you on our website through the use of cookies or other tracking devices.

# 6. How long do we store your personal data

We will not store personal data that we process for any purpose for longer than is necessary for that purpose. After our partnership has ended, your personal data are deleted, unless retention is necessary:

- to ensure compliance with a legal obligation to which we are subject,
- to protect your vital interests or the vital interests of another natural person, or
- for the purpose of any other legitimate interest we pursue that is not overridden by your fundamental rights and freedoms as data subject.

# 7. Sharing of your data

We work with several strategic and trusted partners with whom personal information is shared. Parties we may share your personal data with include our members, service providers engaged by us to perform services in the framework of our relationship with you, such as providing professional advice, managing risks, insurance and legal disputes, or to public authorities if required by law or court order.

## 8. How we protect your data

We follow strict security procedures in the way your personal information is stored and used. We have implemented state-of-the-art data storage methods and security measures to protect your personal information from unauthorized access, misuse or accidental loss. We ensure that all third parties involved in the processing of your personal data are, where appropriate, properly instructed and subject to strict confidentiality obligations.

## 9. Your rights

Under European data protection legislation, you can ask us to:

- to provide you with access to the personal data we process in respect of you and to send you a copy of your personal data we process (right of access) and in case of use of such data elsewhere, to request us to transfer it to a third party of your choice (right of portability);
- to erase the personal data we process about you (right to erasure);
- to modify your personal data if it is no longer correct or complete (right of rectification);
- to restrict the processing of your personal data, which means that we can only store this data without using it for other purposes (right to restrict processing);

- to restrict the processing of your personal data on the basis of a legitimate interest (right of objection);
- to withdraw your consent at any time if we rely on your consent as the legal basis for processing your personal data (right to withdraw consent); and
- to report a concern about any aspect of our privacy practices to the relevant supervisory authority (right to lodge a complaint with the supervisory authority).

# 10. Governing law and jurisdiction

The content of this website, any dispute arising out of the website, and your relationship with us are governed by Belgian law and shall be subject to the exclusive jurisdiction of the courts of Brussels, Belgium.