

## **GENERAL**

We find the protection of your privacy extremely important. We want to inform, respect and give you as much information as possible about what happens to your personal data. Below is information about what information we collect, why we do it, how long we store it, what your privacy rights are and how you can exercise them.

### **1. WHO IS PROTECTED BY THIS PRIVACY POLICY?**

This privacy policy only applies to the personal data that we process as controller (see point 2B of this privacy policy). It applies to the processing of personal data of our customers in relation to our products and services, as well as to the personal data of the end-users who - through their relationship with our customer (for example: employees) - make use of these dONUS services and products. This privacy policy also applies when you visit our offices or websites, use our applications, participate in market research, survey, contest, action or event, log in to our wireless access for visitors or use them in other ways. of our products and services. The personal details of former customers and prospects will also be treated and secured as carefully and carefully as possible, in accordance with this privacy policy.

### **2. WHAT DOES 'PROCESSING OF DATA' MEAN AND WHO IS RESPONSIBLE FOR THIS?**

#### **A. DEFINITION.**

By 'processing personal data' we mean any processing of data that you can identify as a natural person. You can read more about what data is involved in point 3 of this privacy policy. The term 'processing' is broad and covers, among other things, collecting, recording, organizing, storing, updating, modifying, retrieving, consulting, using, distributing or making available in any way, bringing together, combining, archiving, erasing or eventually destroying of that data.

For the sake of clarity, a processing of personal data of customers is only relevant if the customer is a natural person; if the customer is a legal person, then the privacy policy only applies to the personal data of the natural persons that we process in the context of their relationship with the customer (such as mandates, contact persons and / or end users).

## B. PROCESSING MANAGER.

dONUS bvba, with registered office at Prins Boudewijnlaan 41/5, 2650 Edegem, and registered with the KBO under number 541.440.736 (hereinafter "dONUS") is controller of your personal data. This means that dONUS determines the purpose and means for the processing of your personal data. This does not alter the fact that you have a number of obligations with regard to the processing of personal data of the end users that you use to make use of dONUS products and services (see point 2C of this privacy policy).

## C. YOUR RESPONSIBILITIES TOWARDS END USERS.

If you as a customer allow end-users (such as employees) to make use of dONUS products and services that fall under this privacy policy, then you have the following responsibilities: • you must adequately inform the end users that dONUS will process their personal data by using the dONUS products and services; • you must obtain all legally required consents from the end users before their personal data are communicated to dONUS for processing in the context of the dONUS products and services that you allow them to use; • you may not use the dONUS products and services to collect personal data that are in conflict with the applicable privacy legislation, nor to unlawfully allow yourself access to the personal data of the end-users; • you must inform dONUS about the security level of the dONUS products and services and take appropriate technical and organizational measures to suit your own judgment and ability to adequately protect the personal data against unauthorized or unlawful processing and against unlawful or unintentional destruction, unintentional loss, forgery, unauthorized distribution, damage, modification, unauthorized access or disclosure; • you must take all reasonable measures to ensure the reliability of the end-users, who have access to the personal data. • you may not do, cause or allow anything that could in any way result in any violation of this privacy legislation

## 3. WHAT PERSONAL DATA CAN WE PROCESS?

### A. THE PERSONAL DATA YOU SHARE WITH US.

We process the personal data you give us, as a customer or as a customer for an end user (see 2C). This can be done by telephone, in writing, electronically (eg email, via a dONUS app) or orally.

## B. THE PERSONAL DATA THAT OUR SYSTEMS COLLECT.

We assign your personal data for the use of our products and services. In addition, our systems also record personal data generated during your use of our products and services, including use by end users.

## C. THE PERSONAL DATA WE OBTAIN FROM THIRD PARTIES.

As a sponsor of events and training courses we obtain participants lists with personal details of those present.

## D. CATEGORIES PERSONAL DATA.

We distinguish different types of personal data in our systems, which can be combined:

- User data: we distinguish the personal data that you can identify as a user of our products and services (for example your name), the personal data that allow us to contact you (for example your address, your e-mail address and your telephone number). personal details that indicate your personal characteristics (for example your age and your gender).
- Data about your use: the data we receive when you use our products and services. For example: how to use our newsletters or websites. As the law states, we do not process sensitive data such as data about your racial or ethnic origin, political opinions, sexual preferences and health.

## E. PERSONAL DATA OF NON-CUSTOMERS.

Through various channels, such as competitions, promotions / promotions, our websites / apps and via the participant lists of events and training, we can collect personal data about persons who are not (yet) a customer of dONUS with the intention to offer these people the most relevant offer. doing the dONUS products and services. We hereby guarantee your right to information and, as far as applicable, together with your possible legally required consent, force us to contract the third parties who collect your data (for us) in this context.

## 4. WHAT ARE WE USING THIS PERSONAL INFORMATION FOR?

### A. PROPORTIONAL PROCESSING.

We process personal data for various purposes, whereby we only process the data that are necessary to achieve the intended purpose. We use

personal data when this is necessary: • in the context of the preparation, execution or termination of our contract; • to comply with the legal or regulatory provisions to which we are subject; • for the defense of our legitimate interests, in which case we always aim for a balance between that interest and respecting your privacy. If the processing of your personal data is not necessary for one of these three reasons, we will always request your permission to process your personal data.

## B. OUR PROCESSING ACTIVITIES.

We collect personal data for the following specific purposes: • To handle an application for our products and services. If you visit our website to gather information and / or request information about our products and services or if you sign up for our newsletter, for example, we need your address details. All information we receive about you during this pre-contractual phase is only used to provide you with the requested information in the way you want. Even if you ultimately decide to become a customer at dONUS, we will ask you for the management of our contractual relationship a number of personal details such as your name, address, telephone number & e-mail address. • To continue to improve our products and services. We can process the data about your use to evaluate and improve our offer. This allows us to tailor our products and services even better to you. • To inform you about (new) products and services from us. We may use your data to offer you (in writing, by telephone or electronically) new products, services or special promotions that we think are of interest to you. It is also possible that we approach you when you are no longer a customer at dONUS, up to 2 years after the end of our relationship. • To monitor our performance. We can use your data and profile to evaluate our products and services. We do this on the basis of feedback from customers about our services (eg via online evaluation). • To comply with our legal obligations. In many cases we are legally obliged to keep certain personal information about you and / or to communicate it to government agencies. In the context of a police or judicial investigation, we can be obliged to communicate certain information to the necessary authorities in a confidential manner. • To keep track of studies, tests and statistics for, among other things, trend analysis, normative groups. We can use your anonymous, aggregated data to, for example, keep our simulations and norm populations contemporary.

## C. AUTOMATED DECISION-MAKING.

dONUS does not take automatic decision-making.

## 5. HOW DO WE PROTECT YOUR PERSONAL DATA?

## A. OUR TECHNICAL AND ORGANIZATIONAL MEASURES.

We work hard to protect your personal data and privacy. Our employees are trained to deal with confidential data correctly. In the framework of every project that aims to process personal data, an assessment is first made with regard to security and the protection of personal data, in which your interests are paramount. For the security of your data, we employ specific persons who supervise compliance with the legislation and our ethical belief as set out in this Privacy Policy. We also employ specialized people who are responsible for the security of our network, our infrastructure and our information systems. In addition, we use all sorts of technical measures to protect your personal data against unauthorized access, unauthorized use and loss or theft of your data, such as: password protection, hard disk encryption software, firewalls, antivirus and access controls for our employees. Should a data breach occur with adverse consequences for your personal data, then as a customer you will be personally informed in the circumstances provided by the law. The number of employees of our company that has access to your personal data is limited and our employees are carefully selected. They will only be granted access to your personal data to the extent that they need this information to perform their duties properly.

## 6. DO WE SELL YOUR DATA TO THIRD PARTIES OR DO WE PASS ON YOUR DATA?

### A. DATA TRANSFERS.

We do not sell personal data to third parties without your permission and we will not pass them on to third parties unless:

- This is necessary for our service. Some of our services and products are managed by a third party who works in our assignment and who assists us in delivering our products and services. Think, for example, of our independent colleagues and the (external) customer service staff who assist our customers on a daily basis. The transfer of your data only takes place for those purposes for which dONUS processes your data itself and is limited to the data that they need for the performance of their task in our assignment. We ensure that they, like us, manage your data safely, respectfully and as a good family man and we provide adequate contractual guarantees.
- There is a legal obligation. We refer to point 4 of this privacy policy.
- You give us permission for this. If dONUS would give personal data to third parties in other situations, this is done with an explicit notification, in which the third party is informed, the purposes of the transfer and processing. Where required by law, we obtain your explicit consent. A few examples:

depending on the trajectory for which you are specified, we may have to pass on your personal details to third parties who are responsible for the products and services needed for this process.

## B. INTERNATIONAL PROCESSING OF YOUR PERSONAL DATA.

dONUS does not process personal data outside the European Union.

## C. USE OF ANONYMOUS DATA.

We use anonymous, aggregated data for commercial purposes and internal / external reporting. These data can never be returned to a specific natural person.

## 7. HOW DO YOU DETERMINE WHICH PERSONAL DATA WE CAN USE FOR COMMERCIAL PURPOSES AND HOW?

We use your data to provide you with excellent service and general communication about the products you have with us or that may be of interest to you. The data (user data) mentioned in point 3 of this privacy policy are processed in the context of our legal obligations, our legitimate interest and the proper execution of your contract (including complaint and customer management. Opt-out for direct marketing. Do not want to receive any form of commercial communication? You always have the right to oppose the use of your personal data for direct marketing purposes without having to give a reason for it. You can always contact dONUS or you can:

- if you no longer wish to receive commercial e-mails: use the unsubscribe option in the e-mail. To make e-mail campaigns more efficient, we use software to measure whether our e-mails were opened and which links were clicked;
- if you wish to unsubscribe from newsletters: via the unsubscribe option in the newsletter.

Please note: the fact that you no longer wish to receive commercial communications from us does not, of course, affect our right to contact you electronically in the context of the execution of your contract or if the law obliges us to do so.

## 8. WHAT ARE YOUR PRIVACY RIGHTS AND HOW CAN YOU EXERCISE THEM?

### A. OVERVIEW OF YOUR PRIVACY RIGHTS.

Your right of inspection You have the right to know at any time from dONUS whether or not we process your personal data, and if we process them in order to view that data and to receive additional information about:

- the processing purposes;
- the categories of personal data concerned;
- recipients or categories of recipients (in particular recipients in third countries);
- if possible, the retention period or, if this is not possible, the criteria for determining this period;
- the existence of your privacy rights;
- the right to lodge a complaint with the supervisory authority;
- the origin of the data if we obtain personal data through a third party;
- the existence of automated decision-making.

You also have the right to receive a free copy of the processed data in an understandable form. dONUS may charge a reasonable fee to cover its administrative costs for any additional copy that you request.

Your right to improvement of personal data You have the right to have incomplete, incorrect, inappropriate or outdated personal data promptly corrected. In order to keep your data up-to-date, we request that you notify us of any change, such as a change to your e-mail address.

Your right to data change (the 'right to forgetfulness') You have the right to have your personal data removed in the following cases and without unreasonable delay:

- your personal details are no longer required for the purposes for which they were collected or otherwise processed by dONUS;
- you withdraw your prior consent to the processing and there is no other legal basis that dONUS can invoke for (further) processing;
- you object to the processing of your personal data and there are no more weighty, justified grounds for (further) processing by dONUS;
- your personal data will be processed unlawfully;
- your personal data must be deleted in order to comply with a legal obligation;
- your personal data were collected when you were still underage.

Please note that we cannot always delete all requested personal data, for example when processing is necessary for the institution, exercise or substantiation of a legal claim. We will inform you about this in our response to your request.

Your right to restriction of processing You have the right to obtain the limitation of the processing of your personal data if one of the following applies:

- you dispute the accuracy of these personal data: their use is limited during a period that enables dONUS to check the correctness of the data;
- the processing of your personal data is unlawful: instead of deleting your data, you request restriction of its use;
- dONUS no longer requires your data for the original processing purposes, but you need them for the institution, exercise or substantiation of a legal claim: instead of erasing your data, its use is limited for the institution, exercise or substantiation. of the legal claim;
- as long as no decision has been taken on the exercise of your right to object to the processing, you request to limit the use of your personal data.

Your right to transferability of personal data ('data portability') You have the right to 'recover' your personal data. This is only possible for the personal data that you have provided to dONUS, based on permission or after agreement. In all other cases you cannot enjoy this right (for example when the

processing of your data takes place on the basis of a legal obligation). There are two aspects to this right: • you can request dONUS to recover the personal data concerned in a structured, current and machine-readable form; • you can request dONUS to pass the relevant personal data directly to another controller. You are responsible for the correctness and safety of the (e-mail) address you provide for the transfer. dONUS has the right to refuse this if the transfer is not technically possible. Your right to object to the processing of your personal data You have the right to object to the processing of your personal data on the grounds of your special situation if the processing is part of the legitimate interest of dONUS or in the context of the general interest. dONUS will cease processing your personal data, unless dONUS can demonstrate compelling and legitimate grounds for processing that outweigh your own or when the processing of the personal data is related to the establishment, exercise or substantiation of a legal claim (for example, filing). of a request to a court). Regarding your right of objection in the context of direct marketing, see point 7 (eg How do you determine which personal data we may use for commercial purposes and how?) Of this Privacy Policy.

## B. PRACTICAL.

How do I exercise my privacy rights? By phone, in writing or by mail. In order to exercise your right of access and to prevent any unauthorized disclosure of your personal data, we must verify your identity. In case of doubt or ambiguity, we will first ask you for additional information (preferably a copy of the front of your identity card). Are there costs attached? You can exercise your privacy rights free of charge, unless your request is manifestly unfounded or excessive, in particular because of the repetitive nature. In such a case we have - in accordance with the privacy legislation - the right and the choice to (i) charge you a reasonable fee (taking into account the administrative costs to provide the requested information or communication and with the costs that accompanied by taking the requested measures), or (ii) refusing to comply with your request. In which format do I receive an answer? If you submit your request electronically, the information will be provided electronically if possible, unless you request otherwise. In any case, we provide you with a concise, transparent, understandable and easily accessible answer. When will I receive an answer? We will respond to your request as soon as possible, and in any case within one month of receipt of your request. Depending on the complexity of the requests and the number of requests, this period may be extended by two months if necessary. In case of an extension of the term, we will notify you within one month of receiving the request. What if dONUS does not respond to my request? We will always inform you in our

reply about the possibility to file a complaint with a supervisory authority and to lodge an appeal with the court.

## 9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We may not store personal data for longer than is necessary to realize the purpose for which we collect it. The storage period can therefore differ per purpose and can sometimes be very short. Sometimes the period can also be longer, for example to meet our legal obligations (to meet our accounting and tax obligations). These archived data are, of course, only accessible to a limited extent. After the applicable storage period (s) have expired, personal data will be deleted or anonymized. Certain data of former customers can be used for a period of 2 years after termination of the contract to recognize the former customer and to keep informed of new products and promotions of dONUS, unless the customer indicates this in accordance with the described procedure. to agree (see point 7 opt-out).

## 10. OUR WEBSITES AND APPS.

If you visit our websites and use our apps, we will process the following personal data from you: • Your IP address, the type and language of your browser, the software, the type and brand of equipment you use while connecting to our websites and apps, the time of your website visit or app use and the web address from which you our website reached, the pages you view, the links (links) you click on and the other actions you take on our websites and apps. We do this by means of cookies or via Google Analytics. • On some dONUS websites and apps we ask for additional personal information, such as your e-mail address, name, address or a telephone number. • When you log into a dONUS application, we ask for a username and password. The personal data we collect through our websites and apps are used for the following purposes: • To be able to deliver our (web) services to you (for example, placing online orders). • To compile statistics and carry out analyzes, with the aim of improving the quality of our websites and our services. For example, if we know that a lot of website users call the customer service in spite of a 'contact form' on the site, we learn from them and we can improve our online services. • To approach you with offers and information about other dONUS products or services.

## 11. COOKIE POLICY.

### A. WHAT ARE COOKIES?

We use cookies when you open our e-mails and / or when you visit our websites. Cookies are pieces of information that are stored on your own computer or mobile device and that are usually used to optimize the usability of websites and apps. There are different types of cookies, divided by origin, function and lifespan. For a complete overview you can consult websites such as [www.allaboutcookies.org](http://www.allaboutcookies.org). dONUS uses cookies to: • Improve the use and functionalities of its websites and apps; • Being able to identify you as a visitor of our websites on a subsequent visit, so that we can increase the user-friendliness by better aligning our websites with your wishes and preferences.

## B. WHAT TYPES OF COOKIES DO WE USE?

Functional cookies: this type of cookies makes the functioning of our websites and apps easier and provides a personalized browsing experience by, for example, remembering login names, passwords and preferences - such as the language setting. Performance cookies: these cookies collect information about the use of our websites and apps such as the number of visitors, which are popular web pages and the time users spend on a particular web page. Based on the behavior of our users, we can improve our websites and apps and optimize and personalize the user experience. We also rely on third party cookies such as: • Google Analytics: collects anonymous data about the use of our website and compiling visitor statistics. More information about how Google uses your data can be found at: <https://www.google.com/intl/en/policies/privacy/partners/> • Social media cookies: these cookies enable the functionalities of social media websites such as Facebook, Twitter and Instagram. Think of a YouTube video for one of our products or services. "Cookies" also mean similar technologies, such as flash cookies, device fingerprinting, html5-local storage and javascripts.

## 12. HOW CAN I CONTACT QUINTESSENCE?

If you want to reach the dONUS customer service in relation to this privacy policy (for example to adjust your privacy settings), you can do this in writing, by telephone or by mail. For more information about this privacy policy or for complaints regarding the processing of your personal data, you can contact the Data Protection Officer of dONUS via [ict.security@donus.be](mailto:ict.security@donus.be).

## 13. STAY INFORMED OF ADJUSTMENTS

dONUS may change this privacy policy from time to time, for example as a result of market developments and new processing activities of dONUS. We therefore invite you to always consult the latest version of this policy on our website (<https://www.donus.be/en/privacy-policy.pdf>). Of course we inform you in advance via our websites or other current communication channels of any change in content and we ask you when the law requires your prior permission for our (new) processing activities.

#### 14. ESCALATION WITH THE SUPERVISORY AUTHORITY

For complaints regarding the processing of your personal data by dONUS, you can contact the Data Protection Authority, Drukpersstraat 35, 1000 Brussels / +32 (0) 2 274 48 00  
/ [commission@privacycommission.be](mailto:commission@privacycommission.be) / [www.privacycommission.be](http://www.privacycommission.be).