

Privacy Statement EOS CONTENTIA BELGIUM

Last updated: 01/03/2021

1. Name and contact details of the controller.

This privacy statement applies to data processed by:

EOS Contentia Belgium SA/NV, with its registered office at:

FUTUR X CENTER
Boulevard Industriel 54 K
7700 Mouscron
BELGIUM
Telephone: +32 56 39 17 11

Managing Director: Martine T'Jampens

Company number/VAT/MAE

BE 0454.609.009
VAT BE 454.609.009
M.A.E. – 206729

2. The Data Protection Officer

EOS-Contentia has appointed a Data Protection Officer (DPO):

E-mail: Privacy@eos-contentia.be

Postal address: Boulevard Industriel 54 K, 7700 Mouscron, Belgium

If, after reading this Privacy Statement, you have further questions or comments regarding the collection and processing of your personal data, please contact our DPO.

We make every effort to handle your Personal Data in a careful and legitimate manner in accordance with applicable regulations. Nevertheless, if you believe that your rights have been violated and your concerns have not been addressed within our company, you are free to file a complaint with:

Data protection authority

Drukpersstraat 35, 1000 Brussels

+32 (0)2 274 48 00

+32 (0)2 274 48 35

contact@apd-gba.be

You can also contact them for any general questions relating to the processing and protection of personal data.

You may additionally apply to a court if you believe that you would suffer damage as a result of the processing of your Personal Data.

3. Scope

EOS Contentia Belgium SA/NV is committed to the safe, transparent and confidential collection and processing of your personal data, to your privacy and the protection of your personal data and the information relating to you as a person (collectively "Personal Data"), as well as to your rights in relation to the processing of your Personal Data.

In particular, we want to protect the data of our customers, debtors, employees, subcontractors and suppliers, among others, against loss, leaks, errors, unauthorised access or unlawful processing.

This Privacy Statement relates to all services provided by us and in general to all activities we conduct, either through our website (online) or from our offices (offline).

In this Privacy Statement, we describe and inform you about what Personal Data we process about you, how we process it, for what purposes we process it, to whom we may provide it, how long we store it, how we secure it and what rights you have.

This Privacy Statement was prepared in implementation of the General Data Protection Regulation ("GDPR") more specifically Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such data, entered into force from 25/05/2018.

We ask that you read this Privacy Statement carefully before providing Personal Data, as it contains essential information about how your Personal Data is processed and for what purpose.

4. Privacy Statement of the other companies of the EOS Group

This privacy statement does not apply to data processed by the other companies of the EOS Group. This is also the case if these other companies of the EOS Group, together with their contacts, are mentioned on our website and/or if their services are shown on our website.

The other companies of the EOS Group will provide a separate privacy statement for specific data processing on a case-by-case basis.

5. Personal data

Depending on your activities and your relationship with EOS Contentia Belgium SA/NV, you will provide us with the following personal data:

-your identity and contact details (name, title, address, e-mail address, telephone and mobile phone number).

-For certain specific services or in order to comply with legal obligations, you may have to provide us with additional data as specified below.

We kindly draw your attention to the fact that you are responsible for all data you provide to us and that we rely on its accuracy. Should your data no longer be up-to-date, please inform us immediately.

You are not obliged to communicate your personal data, but you understand that providing certain services or cooperating will become impossible if you do not consent to their collection and processing.

6. Processing

We process your Personal Data for various purposes. When processing them, only those data are processed which are necessary for the intended purposes.

EOS Contentia Belgium SA/NV uses the data it collects for three basic purposes, described in more detail below: (1) to run our business and provide (including improving and personalizing) the services we offer, (2) to improve the quality of our services and (3) to send communications, including direct marketing and promotional communications.

(1) **Business operations.** We use data to deliver and improve the products and services we offer and to perform essential business functions, such as scheduling appointments.

(2) **Communication.** We use the information we collect to communicate with you and to personalise communications.

(3) **Recruitment.** We use the information we collect to communicate with you, to manage the recruitment and hiring processes of EOS Contentia Belgium SA/NV and to comply with legal and regulatory requirements. If you are hired, the information may be used in connection with employment and business management.

The purposes for which we process data may vary depending on the person from whom and about whom we process data.

Definitions:

- **Customer/Partner:** the companies that either entrust EOS Contentia with a service contract for debt collection or sell a debt portfolio to EOS Contentia.
 - **Debtor:** the debtor of the debt, either to the Customer/Partner in the case of a debt collection service contract or to EOS Contentia in the case of a debt transfer
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1. Customer data

Within the framework of our services and activities, we collect and process the identity and contact data of prospective/potential customers as well as our customers and clients, their staff, employees, appointees and other useful contacts.

The purposes of these processing operations are the execution of the agreements with our customers, customer management, accounting and direct marketing activities such as sending promotional or commercial information. The legal grounds are the execution of the agreement, the fulfilment of legal and regulatory obligations and/or our legitimate interest.

The legal basis for prospecting is our legitimate interest in expanding our market share, increasing our customer base and publicising our range of services (such as for direct marketing).

EOS Contentia Belgium SA/NV processes data about you when you call on us as a client for advice on agreements for debt collection or debt management, agreements for the assumption of debts, the offering or proposal of such agreements, the performance of preparatory work for the conclusion of these agreements, and the management of debt collection files.

We collect this data both when you give it to us verbally, when you send us documents and when you do it digitally, as well as when we look for it through public channels (such as the Belgian Official Gazette, Crossroads Bank for Enterprises, National Bank, etc.) and professional social media (such as LinkedIn).

With regard to our website, we tailor its content and its ease of use to you, its users, as much as possible. In addition, we process your data to fulfil the obligations arising from the provision of a website and its content and to enable you to use the interactive applications and services on this website. Our customers can use the digital customer platform My Eos Contentia. The Privacy Statement for this portal can be found on this website: [Client Portal My Eos Contentia](#)

2. Supplier data

Data from suppliers (suppliers also means service providers, partners, liberal professions, brokers, agents, consultants, (sub)contractors, sellers of goods or services...)

We collect and process the identity and contact details of our suppliers as well as their possible (sub)contractors/suppliers, their staff, employees, appointees and other useful contacts. The purposes of these processes are the execution of this agreement, the management of the suppliers, accounting and direct marketing activities such as sending promotional or commercial information. The legal grounds are the execution of the agreement, the fulfilment of legal and regulatory obligations.

3. Personnel data

We process the personal data of our employees as part of our personnel management and payroll administration. Due to its specific nature, this processing is regulated in more detail in an Employee Data Protection Policy.

4. Data of candidates in recruitment

For our recruitment activities, EOS Contentia Belgium SA/NV may ask you for certain information, including information about your education and employment, contact details and preferences, professional qualifications and jobs for which you wish to apply. You may also choose to provide EOS Contentia Belgium SA/NV with additional information, such as your CV or diploma, employment references and related information, and compensation requests. In addition, EOS Contentia Belgium SA/NV may collect information from third parties, for example in connection with a background or employment check and/or an employment reference. Given its specific nature, this processing is regulated in more detail in a Data Protection Policy for Candidates in the context of Recruitment applicable within our company.

5. Debtor data

Debtor data is processed in accordance with the [Debtor Privacy Statement](#).

6. Other data

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

We process for all the above-mentioned persons, as appropriate, Personal Data that

In addition, we also process Personal Data to comply with certain legal obligations. For example, the Law of 18/09/2017 on the Prevention of Money Laundering and Terrorist Financing and on Restricting the Use of Cash requires us to identify customers.

We process Personal Data if this is necessary for the fulfilment of an interest that is justified for us.

Finally, we may also process Personal Data where you have given your unambiguous consent.

7. Duration/Conservation period

Personal data will be stored and processed by us for a period of time that is necessary in function of the purposes of the processing, the mandatory legal retention periods and/or in function of the (contractual or non-contractual) relationship that we have with you.

In particular, we process data for as long as it is necessary for the performance of the contract or for the implementation of measures preceding the conclusion of the contract which were taken at your request, for as long as it is necessary for the fulfilment of our legal obligations or if the processing is necessary for the protection of our legitimate interest to prevent abuse.

Customer data, accounts receivable data and data of suppliers or subcontractors will in any case be deleted from our systems after a period of ten years from the end of the year following the termination of the agreement, except in the case of such personal data which we are obliged to retain for a longer period on the basis of specific legislation or in the case of an ongoing dispute or court case for which the personal data is still necessary.

Data for recruitment is stored for a maximum of 24 months. Candidates may request the deletion of their data at any time if they do not wish to maintain their candidacy by notifying our Recruitment Manager or contacting the Data Protection Officer of EOS Contentia Belgium SA/NA.

8. Technical and organisational measures

Personal data collected by EOS Contentia is only stored and processed in the European Union. We take steps to ensure that the data we collect under this Privacy Statement is processed in accordance with the provisions of this statement and the requirements of applicable law wherever the data is located.

We take the necessary technical and organisational measures to process your personal data with an adequate level of security and to protect them against destruction, loss, falsification, alteration, unauthorised access or accidental disclosure to third parties, as well as any other unauthorised processing of these data.

The be.eos-solutions.com website uses SSL (secure socket layer) in combination with the highest level of encryption supported by your browser. This is generally 256-bit encryption. If your browser does not support 256-bit encryption, 128-bit v3 technology will take its place. You will see that an individual web page on the Internet is transmitted encrypted by the closed key or padlock icon in the lower status bar of your browser.

We take appropriate technical and organisational security measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction or access by unauthorised third parties. Our security measures are constantly being improved in line with technological developments.

In no event can EOS Contentia be held liable for any direct or indirect damage arising from the wrongful or unlawful use of the personal data by a third party.

EOS Contentia is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to protect your personal information from unauthorised access, use or disclosure.

EOS Contentia is also committed to reducing the risks of human error, theft, fraud and misuse of EOS Contentia facilities. EOS Contentia's efforts include making staff aware of security policies and training them to implement them. EOS Contentia employees are required to maintain data confidentiality. Employee obligations include written confidentiality agreements, regular training on information protection and compliance with company policies regarding the protection of confidential information.

EOS Contentia quickly evaluates and responds to incidents that cause suspicion of unauthorised processing of data. If EOS Contentia determines that your data has been misused (including by an EOS Contentia employee) or otherwise wrongfully obtained by a third party, EOS Contentia will immediately report such misuse or acquisition to you.

EOS Contentia will conduct compliance audits on an annual basis. Any employee caught by EOS Contentia not complying with the GDPR is in violation of this Privacy Policy and will be subject to disciplinary action up to and including termination of employment. Any third party who violates this Privacy Policy will be required by all agreements with EOS Contentia to indemnify and hold EOS Contentia harmless for claims relating to such violations.

9. Place of processing

All personal data is stored, processed and held only within the European Union (specifically in Belgium, France and Germany).

In the context of international debt recovery, processing may be carried out by debt recovery service providers outside the European Economic Area.

10. Transfer of personal data

For the purpose of processing your personal data, we grant access to your personal data to our employees, collaborators and appointees as well as certain service providers. We guarantee a similar level of protection by providing contractual obligations to these employees, staff and agents as well as service providers, which are similar to this Privacy Statement.

It is possible that one or more of the above-mentioned third parties are located outside the EEA. However, we strive as a matter of principle not to transfer your data to third countries or international organisations. If this should nevertheless happen for processing purposes and if, according to the European Commission, these countries do not guarantee an adequate level of protection of Personal Data, we will take appropriate protective measures.

Transfers of data outside the European Union are made on the basis of EU Standard Model Clauses on data protection where the country to which the data is transferred does not provide adequate protection within the meaning of the GDPR. No transfers to the United States of America are carried out on the basis of the EU-US or Swiss-US Privacy Shield/Safe Harbour.

We only transfer your personal data to other companies of the EOS Group or other third parties (recipients) if:

- you have given your explicit consent for one or more specific purposes pursuant to Art. 6(1) Paragraph 1(a) of the GDPR,
 - disclosure is necessary for the assertion, exercise or defence of legal claims in accordance with Art. 6(1) para. 1(f) of the GDPR and there is no reason to assume that you have a primary, legitimate interest in the non-disclosure of your data,
 - in case a legal obligation for disclosure exists according to Art. 6(1) Paragraph 1 (c) of the GDPR and
 - it is permitted by law and necessary for the fulfilment of contractual obligations in accordance with Art. 6(1) Paragraph 1 (b) of the GDPR.
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Your Personal Data are mainly processed internally. However, in order to execute our agreement (or measures preceding the conclusion of the agreement) or to fulfil certain legal obligations, they may sometimes need to be communicated to third parties.

Certain personal data collected by us will also be passed on to and possibly processed by third-party service providers, such as our IT supplier, external partner assisting us with the support and further development of our IT tools, hosting partner, accountant, auditor, as well as by government or auditing authorities. These and other public authorities are entitled to request data from us to which we are legally obliged to respond. In such cases, your data may be transmitted to these third parties but only for the purpose of the service in question and always under our company's control.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialised service providers appointed by them shall respect the confidential nature of your personal data and may use these data only for the purposes for which they were provided.

If necessary, your personal data may be passed on to other third parties. This may be the case, for example, if all or part of our business is reorganised, if our activities are transferred or if we are declared bankrupt. It is also possible that personal data may need to be transferred in response to a court order or to comply with a specific legal obligation. In this case, we will make reasonable efforts to inform you in advance of such communication to other third parties. However, you will acknowledge and understand that in certain circumstances, this may not be technically or commercially feasible, or that legal restrictions may apply.

Under no circumstances will we sell or make your personal data commercially available to direct marketing agencies or similar service providers, except with your prior consent.

11. Your rights

In accordance and under the conditions of the Belgian privacy law 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 know, free of charge, what information we hold about you and how it is used.
 - Right to rectification: you have the right to obtain the rectification (correction) of your inaccurate personal data as well as the completion of incomplete personal data.
 - Right to erasure or restriction of processing: You have the right to request us to erase your personal data or to restrict its processing in the circumstances and under the conditions stipulated by the General Data Protection Regulation. We can refuse the erasure or restriction of any personal data that is necessary for us to carry out a legal obligation, the performance of the contract or our legitimate interest, and this as long as this data is necessary for the purposes for which it was collected.
 - Right to data portability: You have the right to obtain the personal data you have provided us with in a structured, common and machine-readable form. You have the right to transfer this data to another data controller.
 - Right to object: You have the right to object to the processing of your personal data for serious and legitimate reasons. However, please note that you cannot object to the processing of personal data which are necessary for us to carry out a legal obligation, the performance of the contract or our legitimate interest, and this as long as these data are necessary for the purposes for which they were collected.
 - Right of withdrawal of consent: If the processing of personal data is based on prior consent, you have the right to withdraw this consent. These personal data will then only be processed if we have another legal basis for this.
 - Automatic decisions and profiling: we confirm that the processing of personal data does not include profiling and that you are not subject to fully automated decisions.
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You may at any time inspect the data that we process about you and, if necessary, have it corrected. To do so, simply request this through our Data Protection Officer with proof of your identity. We ask this in order to prevent your data from being communicated to someone who is not entitled to it.

You can object at any time to the use of your data by our company for direct marketing purposes. If you do not wish to be informed about offers from our company, you can report this to our Data Protection Officer .

Insofar as we process your data solely on the basis of your consent, you may withdraw such consent at any time by contacting our Data Protection Officer, whereupon the processing will be discontinued by us. All processing previously carried out on the basis of your consent will remain lawful.

12. Changes

We will update this Privacy Statement as necessary to reflect customer feedback and changes in our services. When we post changes to this statement, we will revise the "last updated" date at the top of the statement. If there are material changes to the Statement or in how EOS Contentia Belgium SA/NV will use your personal information, we will notify you either by prominently posting a notice of such changes prior to their entry into effect or by directly sending you a notification. We encourage you to periodically review this Privacy Statement to be informed of how EOS Contentia Belgium SA/NV is protecting your information.
