

Privacy Statement

CHATBOT APPLICATION

EOS CONTENTIA

Principles

EOS CONTENTIA Belgium nv/sa (hereinafter referred to as “EOS CONTENTIA”) respects individual privacy and values the confidence of its customers, employees, suppliers, contractors, business partners, and the general public.

That is why EOS CONTENTIA strives to collect, use and disclose personal data in a manner consistent with the laws of the countries in which it does business.

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

We want to inform you about the collection and processing of your personal data in our chatbot application to be found on the EOS CONTENTIA website (“chatbot”) via my.eos-contentia.be by means of this Chatbot Application Privacy Statement (“Privacy Statement”).

We ask that you read this Privacy Statement carefully, as it contains essential information about how your personal data are processed in the chatbot and for what purpose.

The additional processing provisions of the following privacy statements also apply to this Privacy Statement and are to be read together and complementary to this Privacy Statement:

- The privacy statement for processing of debtor personal data:

<https://be.eos-solutions.com/en/privacy-statement-partner-portal-contentia.html>

- The corporate privacy statement of EOS CONTENTIA

<https://be.eos-solutions.com/en/privacy-statement-contentia.html>

By communicating your personal data, you expressly declare that you have read this Privacy Statement and also expressly agree to it, as well as to the processing itself.

We kindly point out to you that you are responsible for all data you provide to us and that we rely on its accuracy. If your data is no longer up to date, please inform us immediately.

You are not obliged to disclose your personal data, but you understand that the provision of certain services or cooperation becomes impossible if you do not consent to its collection and processing.

Information Security

EOS CONTENTIA is committed to being compliant to the EU General Data Protection Regulation.

The management of EOS CONTENTIA recognizes the importance of identifying and protecting the information assets of the organization, avoiding destruction, improper disclosure, improper modification or unauthorized use of any information relating to its customers, employees, pricing, strategy, management, or other related concepts.

EOS CONTENTIA is therefore committed to develop, implement, maintain and continually improve its information security management system in order to ensure the confidentiality, availability and integrity of personal data and information in general.

Privacy Statement

Last Updated: April 2021

Your privacy is important to us. This privacy statement addresses information we collect via our chatbot. It explains what personal data we collect from you via the chatbot and how the chatbot uses it.

Processing responsibility

EOS CONTENTIA NV, with registered office at:

FUTUR X CENTER, Industriëlaan 54 K, 7700 Mouscron, Belgium, company registration number 0454.609.009, is the controller of your personal data.

When collecting and processing your personal data, we respect the Belgian data protection regulations, as well as the General Data Protection Regulation ("GDPR") as of its entry into force on 25 May 2018.

From whom do we collect data via the chatbot ?

- Website user data

The essential purpose of the chatbot is to provide standard, non-personalized, information to any user of the chatbot that has a general question of information or requires help and assistance to find certain information. It is also meant to answer personal questions of any user including queries from debtors having an open debt recovery dossier at EOS-Contentia. It is required to identify yourself and submit personal data such as your name, address, telephone number, case number etc... to the chatbot if you want to use its services. The user of the chatbot is therefore requested to provide the required authentication data in order to allow EOS-Contentia to provide a safe and secure chat-solution.

As soon as the website user submits her or his personal data to the chatbot, we will collect and process the identity, contact details, IP address and all other personal data that the website user freely submits to the chatbot. The purposes of this processing is the provision of help, assistance and information as described above . The legal ground for the processing is our legitimate interest to offer modern and easily accessible means of communication.

- Other Data

In addition to the personal data regarding the user of the chatbot , we also process personal data of other persons, if those are submitted by the user of the chatbot. We insist that the user of the chatbot does not submit such personal data of other persons and we will delete those data if they are transferred anyhow.

Personal Data We Collect

EOS CONTENTIA collects data to operate effectively and provide you the best experiences with our services. Through your interaction with us, EOS CONTENTIA may collect Personal Data which is submitted freely and voluntarily by yourself, which is information that identifies an individual or relates to an identifiable individual. Personal Data may include, but is not limited to, your name, physical address, telephone number, e-mail address.

Types of personal data

EOS CONTENTIA may process and collect the following personal data:

- your identity and contact details (name, title, address, e-mail address, telephone and mobile number);
- national number (for the recovery of consumer and mortgage credits): registrations with the Central Individual Credit Register (CCR).
- date of birth
- bank account
- Information on outstanding debts, contracts, payments made and not made, correspondence conducted with the debtor
- Additional information provided directly by the debtor to our services, to the extent relevant for the recovery procedure (for evaluation and considered handling of your file: reasons for non-payment based on information provided by you, such as individual or family circumstances, work related circumstances, the fact that you are in prison,...).
- financial information for risk analysis: payment history, information on your debts, income, solvency, visit reports
- Voluntarily submitted personal data provided they are relevant to the debt recovery file

Method of collection of personal data

This data is collected directly from the website user:

- Insertion of data in the chatbot

The chatbot may also collect other information through your interaction with it, which does not reveal your specific identity or does not directly relate to an individual. Such other information may include, but is not limited to, browser and device information, data collected through automated electronic interactions, application usage data, demographic information, geographic or geo-location information, statistical and aggregated information.

Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal data.

You have choices about the data we collect. When you are asked to provide personal data, you may decline.

EOS CONTENTIA will collect only personal data which is relevant for the purposes for which it is to be used. EOS CONTENTIA will take reasonable steps to ensure that personal data is relevant, accurate, complete, and current, to its intended use.

Our use of Personal Data

EOS CONTENTIA uses the data collected via the chatbot for the following purposes:

Communications. We use data we collect to deliver communications to you via the chatbot.

Information. We use data we collect to deliver information regarding standard topics and answers to standard questions to you.

Help and assistance. By providing communications and information through the chatbot, we provide you help, and assistance.

Enrichment of our debt recovery management system. We insert the information relevant to your debt recovery file in our debt recovery management system. This may be insertion of new information related to your debt recovery file or updating of your existing information in your debt recovery file.

As from that moment, the inserted information may be further used for the following purposes:

- Debt recovery management
 - Processing of debtors' data and outstanding debts
 - Execution of recovery activities
 - Contacts via correspondence, telephone, sms, chat

- Contacts via the debtors portal (online My Eos Contentia)
- Recovery activities
 - Formatting, printing and sending letters to debtors
 - Organizing and carrying out home visits to debtors in order to provide explanations and conduct negotiations to speed up and facilitate recovery
- Opening of court case
 - Involving a lawyer for recovery if this will have to be done by court order. In this case, a lawyer will have access to the complete debtor file.
- Cross-border/international files
 - Processing of debtors' data and outstanding debts
 - Execution of recovery activities
 - Involving a foreign debt collection company for collection. In this case, this collection company will have access to the complete debtor file.
- Information to the creditor
 - Reporting on the status and progress of debt recovery for each debtor
- Preservation, storage and processing via special software
 - The management of debtors files is done in specific management software (application, data base and backups).
- Business analytics
 - The use of the debtor database for analysis, reporting, statistics and forecasts whose output is anonymous
 - The use of the debtor database for internal reporting and management as well as for reporting to creditors, on the basis of a contractual reporting obligation
- Audit and control
 - Legal obligation to communicate debtors' personal data for the purposes of public control (accounting, tax, legislation on the prevention, monitoring and detection of fraud, money laundering and other criminal activities).
- Deletion and destruction of personal data after the retention period applicable to the specific processing.
- Transmission to the Central Individual Credit Register
 - For bank or credit claims, personal data are processed within the framework of our statutory obligation to notify the Central Individual Credit Register on the basis of the Royal Decree of 23 March 2017 regulating the Central Individual Credit Register.
- Improving our debt recovery procedures
 - search activities in the debtor database
 - evaluations concerning payment behaviour
- Development of our debt collection activities
 - The de-identification of debtors data in order to develop activities.
- Securing our debt collection activities
 - Use of debtors' personal data to secure them and to develop and adapt appropriate tests of our IT system.
- IT management
 - storage, backup, deletion of data,...

- For this part of the processing of your personal data, please visit also: The privacy statement for processing of debtor personal data:

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Why We Share Personal Data

We share your personal data in case we have a legal obligation to do so and in other cases with your consent or as necessary to complete any transaction or provide any service or product you have requested or authorized. In addition, we share personal data among EOS CONTENTIA -controlled affiliates and entities. We also share personal data with suppliers, processors or agents working on our behalf for the purposes described in this statement. Finally, we will access, transfer, disclose, and preserve personal data, including your content, when we have a good faith belief that doing so is necessary to:

- comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies;
- protect our customers, for example to prevent spam or attempts to defraud users of our services, or to help prevent the loss of life or serious injury of anyone;
- operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks; or
- protect the rights or property of EOS CONTENTIA

Subprocessors

Name	Data processing activity	Privacy statement	Place of storage of personal data	Place of processing of personal data
BOOST AI	Chatbot application on EOS Contentia website	Cookies & Privacy (boost.ai)	Amazon Web Services European Union hosting instance	Amazon Web Services European Union hosting instance

Where Do we Store and Process Your Personal Data?

Personal data collected by EOS CONTENTIA may be stored and processed in your region or in any other country where EOS CONTENTIA or its affiliates, subsidiaries or service providers maintain facilities. We take steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located.

When we transfer personal data from the European Economic Area to other countries, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data.

How long do we keep your Personal Data? Retention of Personal Data

EOS CONTENTIA retains personal data for as long as necessary to provide the chatbot service or for other essential purposes such as complying with our debt recovery activities, legal obligations, resolving disputes, and enforcing our agreements.

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Security of personal data : Technical and organizational measures

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

Under no circumstances shall EOS CONTENTIA be held liable for any direct or indirect damage resulting from the incorrect or unlawful use of 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 help protect your personal data from unauthorized access, use or disclosure.

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

EOS CONTENTIA promptly evaluates and responds to incidents that create suspicions of unauthorized handling of data. If EOS CONTENTIA determines that your data has been misappropriated (including by a EOS CONTENTIA employee) or otherwise wrongly acquired by a third party, EOS CONTENTIA will promptly report such misappropriation or acquisition to you.

EOS CONTENTIA will conduct annual compliance audits. Any employee that EOS CONTENTIA determines is in violation of this privacy statement will be subject to disciplinary action up to and including termination of employment. Any agent or third party that violates this privacy statement shall be in material breach of all agreements with EOS CONTENTIA and shall defend and indemnify EOS CONTENTIA from claims related to such violations.

Your rights as a data subject: You CAN Access & Control Your Personal Data!

Upon request, EOS CONTENTIA will grant individuals reasonable access to Personal Data that it holds about them. In addition, EOS CONTENTIA will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

In accordance with and subject to the conditions of 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 inspect, free of charge, the data that we hold about you and to check what they are used for.

Right of rectification: you have the right to obtain rectification (correction) of your incorrect personal data, as well as to complete incomplete personal data.

Right of deletion or limitation: you have the right to request us to delete or limit the processing of your personal data in the circumstances and under the conditions laid down by the General Data Protection Regulation. We may refuse the deletion or restriction of any personal data which is necessary for us to fulfil a legal obligation, the performance of the contract or our legitimate interest, and this for as long as these data are necessary for the purposes for which they were collected.

Right to transferability/portability of data: You have the right to obtain the personal data you have provided to us in a structured, common and machine-readable form. You have the right to transfer these data to another data controller.

Right of objection: you have the right to object to the processing of your personal data for serious and legitimate reasons.

Right of withdrawal of consent: If the processing of personal data is based on prior consent, you have the right to revoke this consent. These personal data will then only be processed if we have another legal basis for doing so.
Automatic decisions and profiling: We confirm that the processing of personal data does not include profiling and that you will not be subject to fully automated decisions.

You can exercise the aforementioned rights by contacting EOS CONTENTIA via Privacy@eos-contentia.be.

We make every effort to handle your personal data in a careful and legitimate manner in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been violated and if you do not find an answer to your concerns within our company, you are free to lodge 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 may additionally address a court if you believe that you would suffer damage as a result of the processing of your personal data.

Browser-Based Controls

Relevant browser-based cookie controls are described in our Cookie Statement to be found at: (link to Url cookie statement).

Changes to This Privacy Statement

We will update this privacy statement when necessary to reflect customer feedback and changes in our products or 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 will use your personal data, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this privacy statement to learn how EOS CONTENTIA is protecting your information.

How to Contact Us

If you have a privacy concern or a question regarding data protection EOS CONTENTIA , please contact us by using the following contact information.

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

E-mail: Privacy@eos-contentia.be

Postal address: Industriëlaan 54K, 7700 Mouscron/Mouscron, Belgium

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

We will respond to questions or concerns within 30 days:

Email: Privacy@eos-contentia.be