

# Data Protection Statement: Chatbot/Voicebot

Last updated: October 2023

## Introduction

Eos Contentia Belgium NV/SA with registered seat at FUTUR X CENTER, Boulevard Industriel 54 K 7700, Mouscron, BELGIUM, Company number/VAT BE 0454.609.009, M.A.E. – 206729 (hereinafter referred to as “Eos Contentia”), is the controller of your Personal Data. You can reach us via telephone on: +32 56 39 17 11. Our Managing Director is Mrs. Martine T'Jampens.

You are advised to read Eos Contentia/NV's Cookie Statement to understand how Eos Contentia/NV will via Cookies collect, transfer, disclose, process and use your Personal Data when using the Eos Contentia website.

Eos Contentia's Cookie Statement can be found here <https://be.eos-solutions.com/en/cookie-statement-contentia>. This Cookie Statement complements the Data Protection Statement.

Eos Contentia respects the protection of Personal Data, individual privacy and values the confidence of its customers, debtors, 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, debtors, personnel, subcontractors and suppliers, 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 when you use the chatbot/voicebot application to be found on the Eos Contentia website (“chatbot/voicebot”) via [my.eos-contentia.be](https://my.eos-contentia.be) by means of this Chatbot/Voicebot Data Protection Statement.

This Data Protection Statement addresses information we collect from chatbot/voicebot users on the website. It explains what Personal Data we collect from you and how we use it. Eos Contentia's Corporate Data Protection Statement can be found here <https://be.eos-solutions.com/en/privacy-statement-contentia>. This Data Protection Statement as well as the Corporate Data Protection

Statement, the Data Protection Statements for Debtors and Partners complement this Data Protection Statement for the chatbot/voicebot.

We ask that you read this Data Protection Statement carefully, as it contains essential information about how your Personal Data is processed and for what purpose. You are not obliged to disclose your Personal Data, but you understand that the provision of certain services, debtors or customer support or other assistance becomes impossible if you do not consent to its collection and processing.

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

## 1 Data Protection

This Data Protection 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 as well as the Belgian Personal Data Protection Act (the Act on the Protection of Individuals with regard to the Processing of Personal Data of 30 July 2018). Eos Contentia is committed to being compliant to the EU General Data Protection Regulation and the local data protection legislation in Belgium. For more information about the applicable laws regarding data protection, please consult: <https://www.dataprotectionauthority.be/citizen>

## 2 Information Security

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, debtors, employees, pricing, strategy, management, or other related concepts.

Eos Contentia is therefore committed to developing, 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.

### Error or vulnerability report

Despite the care we take to secure our systems, errors or vulnerabilities may happen. In case you see an error or a vulnerability, please inform us thereof so that we can remediate. You can report a security issue to our data protection officer: [privacy@eos-contentia.be](mailto:privacy@eos-contentia.be)

### Cookies

Cookie controls are described in our Cookie Statement <https://be.eos-solutions.com/en/cookie-statement-contentia>

## **3 From whom do we collect data?**

### **3.1 Website user data**

The essential purpose of the chatbot/voicebot is to provide standard, non-personalized, information to any user of the chatbot/voicebot 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/voicebot if you want to use its services. The user of the chatbot/voicebot is therefore requested to provide the required authentication data 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/voicebot, 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/voicebot. The purpose 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.

### **3.2 Other Data**

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

## **4 Which Personal Data do we collect and process?**

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.

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
- ✓ in the voicebot: your voice

We do not want to process special categories of Personal Data of chatbot/voicebot users via the chatbot/voicebot.

We kindly remind 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.

## 5 How do we collect your Personal Data?

We collect Personal Data in variety of ways directly from you:

- ✓ When you communicate your Personal Data verbally or in writing to us, included via insertion in the chatbot/voicebot;
- ✓ When you visit our website;
- ✓ When you contact us via a webform;
- ✓ When you contact us via e-mail, chat/voice(bot), social media or telephone;

The chatbot/voicebot 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.

## 6 How Eos Contentia uses your Personal Data

We process your Personal Data in different ways and for various purposes. When processing them, only Personal Data are processed which are necessary for the intended purposes. The purposes for which we process data may vary depending on the person from whom and about whom we process Personal Data.

Eos Contentia uses the data collected via the chatbot/voicebot for the following purposes:

- ✓ **Communications.** We use data we collect to deliver communications to you via the

chatbot/voicebot.

- ✓ **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/voicebot, 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.

✓ **Further debt recovery**

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 behavior
- 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,...

## **7 Profiling and recording**

We confirm that the processing of Personal Data does not include profiling and that you are not subject to fully automated decisions.

When you contact Eos Contentia by telephone, this telephone call may be recorded. We record these telephone calls for educational, quality and security reasons. Only a limited number of employees in the customer service department have access to the recordings. Telephone recordings are automatically deleted after 30 days.

## **8 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

Eos Contentia may disclose and transfer Personal Data to IT providers, subcontractors and other external service providers that assist in the operation of our website or any software used in the processing of chatbot/voicebot user Personal Data, if any.

Eos Contentia may disclose and transfer Personal Data to a third party in connection with a merger and acquisition or other similar activity.

## 8.1 Subprocessors

| Name            | Data processing activity                                     | Privacy statement            | Place of storage of Personal Data                          | Place of processing of Personal Data                       |
|-----------------|--|------------------------------|--|--|
| <b>BOOST AI</b> | <b>Chatbot/Voicebot application on Eos Contentia website</b> | Cookies & Privacy (boost.ai) | <b>Amazon Web Services European Union hosting instance</b> | <b>Amazon Web Services European Union hosting instance</b> |

## 9 Where do we store and process your Personal Data?

Personal Data collected by Eos Contentia may be stored and processed in the European Union (specifically in Belgium, France and Germany) or in any other country where Eos Contentia or its affiliates, subsidiaries, outsourcing partners or service providers maintain facilities. We take steps to ensure that the data we collect under this Data Protection Statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located. In the context of international debt recovery, processing may be carried out by debt recovery service providers outside the European Economic Area (EEA). When we transfer Personal Data from the European Economic Area to other countries, we use a variety of legal mechanisms, including contracts (EU Standard Contractual Clauses), to help ensure your rights and protections travel with your Personal Data.

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

We will retain your Personal Data if they are necessary for the legitimate purpose for which they were obtained, to ensure good recruitment practices.

Eos Contentia retains Personal Data for as long as necessary to provide the chatbot/voicebot service or for other essential purposes such as complying with our debt recovery activities, legal obligations, resolving disputes, and enforcing our agreements.

For this part of the processing of your Personal Data, please visit also:

- ✓ The privacy statement for processing of debtor Personal Data: <https://be.eos-solutions.com/en/privacy-statement-debtors-my-eos-contentia>
- ✓ The corporate privacy statement of Eos Contentia: <https://be.eos-solutions.com/en/privacy-statement-contentia>

For statistical, analytical, and business intelligence purposes, we will only retain anonymized or pseudonymized data after this retention period.

## 11 Technical and organizational measures

We take steps to ensure that the Personal Data we collect under this Data Protection Statement is processed in accordance with the provisions of this Data Protection Statement and the requirements of applicable law wherever the Personal Data is located. We take appropriate technical and organisational security measures to protect your Personal 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. 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 Personal Data.

The [be.eos-solutions.com](https://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.

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 unauthorized processing of Personal Data. If Eos Contentia determines that your Personal 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 data breach to you.

Eos Contentia will conduct compliance audits on an annual basis. Any employee caught by Eos Contentia not complying with the data protection policy is in violation of the Data Protection Statement and will be subject to disciplinary action up to and including termination of employment.



Any third party who violates this Data Protection Statement will be required by all agreements with Eos Contentia to indemnify and hold Eos Contentia harmless for claims relating to such violations.

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 however 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.

## **12 Your rights as a data subject: you can access and control your Personal Data!**

In accordance with and subject to the conditions of the General Data Protection Regulation Implementation Act 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 it is 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 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 this 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. Please note, however, that you cannot object to the processing of 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 of withdrawal of consent:* If the processing of Personal Data is based on prior consent, you have the right to revoke this consent. This Personal Data will then only be processed if we have another legal basis for doing so.
- *Automatic decisions and profiling:* You may object to profiling and fully automated decisions.

You can exercise the rights by contacting Eos Contentia via [privacy@eos-contentia.be](mailto:privacy@eos-contentia.be)

### **13 Data Protection Officer: How to Contact Us**

If you have a privacy concern or a question for the Data Protection Officer of Eos Contentia, please contact us by using the following E-mail: [privacy@eos-contentia.be](mailto:privacy@eos-contentia.be). We will respond to questions or concerns within 30 days:

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 the Belgian Data Protection Authority:

Data Protection Authority

Drukpersstraat 35, 1000 Brussel

Tel +32 (0)2 274 48 00

Fax +32 (0)2 274 48 35

email : [contact@apd-gba.be](mailto:contact@apd-gba.be)

<https://www.dataprotectionauthority.be/citizen>

You may additionally contact a court if you believe that you will suffer damage because of the processing of your Personal Data.

### **14 Contact Us**

You can contact the Eos Contentia at any time if you have any queries or if you need help (see the “Legal Information” panel on the Eos Contentia website). To improve our services, telephone conversations may be recorded or monitored by another member of the team.

We will do everything possible to resolve the problem as soon as possible.

### **15 Changes to this Data Protection Statement**

We will update this Data Protection Statement when necessary to reflect customer feedback and changes in our services. When we post changes to this Data Protection Statement, we will revise the “last updated” date at the top of the Data Protection Statement. If there are material changes to the Data Protection 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 Data Protection Statement to learn how Eos Contentia is protecting your information.