# Privacy Statement IFORI

#### **Short**

IFORI located at Victor Braeckmanlaan 107, B-9040 Gent is responsible for the processing of your Personal Data, via its websites www.ifori.be, www.gdprexpert.be, www.academy.ifori.be and via its LinkedIn page https://www.linkedin.com/company/ifori.

IFORI processes data from the visitors and/or users for the following **purposes**:

- Proper technical functioning and personalization of the Website;
- Management of requests for information;
- · Conducting statistical research and analytics;
- Performing payments and billing & debt collection;
- Delivery of IFORI services, including without limitation, invoicing, customer relationship management;
- Displaying content from external content providers;
- Informing you about the progress and outcome of a contest in which you participated;
- Sending a newsletter and/or advertisement, or otherwise contact you about services or information we think may interest you;
- · Offering and following up on trainings via IFORI Academy.

You can always request **access** to - and **rectification** or **erasure** of Personal Data or to **restrict** the processing; as well as the right to **object** to processing, the right to data **portability** and the right to **withdraw** your consent at all times.

Personal Data are transferred to following recipients:

- · Processors that provide market and statistical research & analysis;
- Processors who provide hosting of the Website and related databases;
- Processors who provide cloud and other supported software services for business processing, such as accounting software providers;
- · Processors and controllers that provide communication services;
- Processors and controllers who act as a subcontractor for IFORI in the execution of the services that we provide you;
- Processors and controllers that act as agents or distributors of IFORI;
- Controllers that provide professional services to IFORI such as accountants, lawyers and notaries;
- Companies associated with IFORI.

#### 1. Definitions

In this Privacy Statement the following terms are defined as follows:

A. <u>IFORI</u>: IFORI BV, a company organised and existing under the laws of Belgium, with its registered offices at Victor Braeckmanlaan 107, B-9040 Gent and registered with the Belgian RPR/RPM Gent under number 0472.073.759.

- B. <u>Website</u>: the websites of IFORI, www.ifori.be, www.gdprexpert.be, www.academy.ifori.be and derivative websites developed and administered by IFORI (including without limitation: www.ifori.gent, www.gdprexperts.be, www.gegevensbescherming.be, www.gegevensbeschermingseffectbeoordeling.be, www.privacyimpactassessment.be, www.functionarisgegevensbescherming.be).
- C. Personal Data: Any information relating to an identified or identifiable natural person.
- D. <u>Processing:</u> Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 2. Processing of Personal Data

This Privacy Statement is applicable to all Processing activities undertaken by IFORI, unless further transparency is provided, through e.g. disclaimers, electronic means or orally.

IFORI attaches great importance to respecting and protecting your privacy and the confidentiality and safety of your Personal Data.

The Personal Data is Processed in accordance with Regulation (EU) 2016/679 (hereinafter 'GDPR' or 'Data Protection Regulation').

In this regard IFORI acts as the data controller, meaning that it determines the purposes and means of processing of Personal Data.

#### 3. What information

In case the information is provided by you, the fields of relevant forms denoted with (\*) are strictly necessary for the purposes of processing, if one or more of these fields are not completed the form will not be executed. Other fields can be completed to better facilitate the provision of services by IFORI.

IFORI may process following Personal Data through, including without limitation, the contact form, newsletter form and cookies:

- Information about your computer or mobile device and your visits and use of the Website, including your IP address, operating system, browser type and geographical location:
- Information that you provide by using the contact form or newsletter form, such as your first name, last name and email address;
- Information that you provide by using the IFORI Academy subscription form, such as your first name, last name, email address, occupation and employer.
- Any other information that you choose to provide, by any means.

IFORI may process following Personal Data of business contacts of its suppliers, customers, prospects, etc.:

• Personal contact information that is provided to us, such as your first name, last name, email address, telephone number, mobile number, payment information;

## 4. Purposes of processing

IFORI collects and processes Personal Data for one or multiple of following purposes:

Purposes	Legal basis
Proper technical functioning and personalization of the Website	Legitimate interests of IFORI (development)
Management of requests for information	Consent/Legitimate interests of IFORI (research)
Conducting statistical research and analytics	Legitimate interests of IFORI (research)
collection	Performance of an agreement/Legitimate interests of IFORI (finance/legal defense/rights)
Delivery of IFORI services, including without limitation, invoicing, customer relationship	,
Displaying content from external content providers	Legitimate interests of IFORI (marketing)
Informing you about the progress and outcome of a contest in which you participated	Consent/Legitimate interests of IFORI (marketing)
Sending a newsletter and/or advertisement, or otherwise contact you about services or information we think may interest you	Consent/Legitimate interests of IFORI (marketing)
	Consent/Legitimate interests of IFORI (marketing)

If IFORI wishes to use Personal Data for an incompatible new purpose IFORI will request your consent prior to this new use, unless such Processing is required by Union or national law.

When the Processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal.

#### 5. Transfers of Personal Data

Personal Data is only processed by IFORI for internal use for the above described purposes. We do not rent or sell your Personal Data to third parties for use for their own purposes.

Within IFORI the data is passed on only to employees on a "need to know" basis.

IFORI can make use of data processors to process your Personal Data. Data processors are natural or legal persons, public authorities, agencies or other bodies which process Personal Data on behalf of IFORI.

IFORI can transfer the Personal Data to following (categories of) recipients:

- Processors that provide market and statistical research & analysis;
- Processors who provide hosting of the Website and related databases;
- Processors who provide cloud and other supported software services for business processing, such as accounting software providers;

- Processors and controllers that provide communication services;
- Processors and controllers who act as a subcontractor for IFORI in the execution of the services that we provide you;
- Processors and controllers that act as agents or distributors of IFORI;
- Controllers that provide professional services to IFORI such as accountants, lawyers and notaries;
- Companies associated with IFORI.

Personal Data may be processed by these recipients outside the European Economic Area, IFORI will make sure appropriate safeguards are implemented. You can obtain a copy of the guaranteed measures upon written request.

IFORI may alter its corporate structure through including changing legal form, merger, acquisitions and sale of affiliates, in such transactions Personal Data will be passed on in accordance with this Privacy Statement and applicable data protection law.

# 6. Personal Data storage duration

The Personal Data are kept by IFORI, in any case during the duration of the relevant agreements and for a period equal to the statutory period of limitation thereafter. In addition, Personal Data is kept for as long as required by law and no longer than necessary for the processing purposes described above.

## 7. Your rights

You are entitled to request from us access to and rectification or erasure of Personal Data or restriction of processing or to object to processing as well as the right to data portability. For this purpose you should send your dated and signed request to IFORI, Victor Braeckmanlaan 107, B-9040 Gent, enclosing a copy of your identity card<sup>1</sup>, or you can contact IFORI via email at info@ifori.be and furnish your email with an electronic signature.

Within one month of the submission of the request, you will be informed of the follow-up given to it.

You have the right to withdraw your consent for a particular Processing activity at any time, without this affecting the lawfulness of the processing on the basis of the consent before its withdrawal. In case you have given your permission to receive newsletters and advertising, you can withdraw it by changing your account settings or using the "unsubscribe / unsubscribe" link in this communication.

Finally, you at all times have the right to submit a complaint to the supervisory authority.

IFORI uses automated decision making when Processing Personal Data for one purpose, which is awarding a certificate when a user successfully completes a training course on IFORI Academy. Besides this purpose, no automated decision making, including profiling, is used in the Processing of Personal Data.

# 8. Anonymous data

IFORI is permitted to collect non-personal and anonymous data when the Website is visited and anonymize Personal Data. This data does not allow IFORI to proceed to identify an

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<sup>&</sup>lt;sup>1</sup> Please anonymise the following fields on the copy of your identity card: card number & national register number.

individual person and this data can be shared with third parties, including for statistical purposes.

#### 9. Cookies

Our Website makes use of cookies to enhance the browsing experience. For more information regarding the use of cookies, please refer to our <u>Cookie Statement</u>.

## 10. Changes

IFORI reserves the right to continually update this Privacy Statement.

This Privacy Statement was last updated: 1 June 2021.

### 11. Miscellaneous

If any of the provisions of this Privacy Statement would be wholly or partially annulled by a binding decision, this shall have no effect whatsoever on the other provisions of this Privacy Statement. IFORI is entitled to modify or replace such a provision by another provision which, within legal limits, has the same effect.

The failure of IFORI to demand strict compliance with the provisions of this Privacy Statement shall not be construed as a waiver or rejection thereof.

# 12. Applicable law

Any dispute or claim relating to this Privacy Statement and the processing of Personal Data shall be governed by Belgian law and the exclusive jurisdiction of the courts of Gent (Belgium).

## 13. Contact

If you have any questions or comments regarding the policy concerning the processing of Personal Data after reading this Privacy Statement, please contact the contact person at the address Victor Braeckmanlaan 107, B-9040 Gent or you can contact IFORI via email at info@ifori.be.

Please send requests for additional general information concerning the protection of personal privacy to the Belgian Data Protection Authority to the address, 25 Drukpersstraat, B-1000 Brussels telephone number: +32 (0)2 274 48 00 or via email at contact@apd-gba.be (www.dataprotectionauthority.be).