Privacy statement



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I. Introduction

A. Who are we?

Mente Valiosa Consult BVBA (hereafter: "we "or "us") cares a lot about your privacy and considers it important that your personal data are always treated with the necessary care and confidentiality.

We understand that you want to know why we ask for your personal data and that you may be curious about what we do with it. Through this privacy statement (hereinafter "Privacy Statement") we try to provide an answer here.

If you still have questions after reading this Privacy Statement, you can of course always contact us, via the contact information as reinforced at the bottom of point VI. Contact.

We hereby clarify that this Privacy statement only applies to personal data processed by Mente Valiosa Consult BVBA, with registered office at 9032 Gent, Ruiterlaan 5 and registered with the Kruispuntbank der Ondernemingen under number 0699.822.534 as controller. This means that we define the goal and the means (or the "why" and "how") of the processing of your personal data.

By "processing personal data "we mean any processing of data that you can identify as a natural person. About which data it exactly goes, read t you continue in this Privacy statement. The term "processing" is broad and covers, among other things, the collection, storage, use or distribution of that data.

B. Who and what is this Privacy Statement applicable to?

This Privacy Statement applies to our website https://www.mente-valiosa.be/ (hereafter the "Website") and to the activities that go with it or (commercial) relationships that arise from or are maintained.

This Privacy Statement must be read together with any other conditions that apply to the Website or services, such as the "Payment Terms" and the provisions regarding cookies under point VII. Cookies.

The data subjects (hereinafter "you", "your") to whom this Privacy Statement is addressed may be: the mere visitor of the Website, the private and / or business customers (and the individuals associated with the business customers), suppliers (including subcontractors and individuals associated with suppliers or subcontractors), business contacts (existing or potential customers and individuals associated with them), or any other individuals who come into contact with us.

II. What we do with your personal data?

This Privacy Statement describes what information we collect about you, where this data is used and with whom and under what conditions these data may be shared with third parties. We also explain to you how we store your data and how we protect your data against misuse and what rights you have with regards to the personal data you provide us.

A. When we collect your personal data as responsible for database management?

We can process your data as:

- you contact or have contacted us
 - by a visit to our Website;
 - e.g. submitting a request for exercising your rights;
 - e.g. filling out a contact form.;
 - by to subscribe to our newsletter or events;
 - e.g. placing an order via a web shop;
- one of our services to you or have granted to you
- when you could provide services in the future
- you are our contact person for one of our customers or suppliers

B. What data can we collect?

We can process the information below from you. Depending on the situation, however, we do not always have all the following information:

Your (personal) identification data for example your name, telephone number, e-mail

address, identity card details and a copy of the identity

card, ...

Your electronic identification data e.g. IP addresses, cookies, browser

type, connection moments ,...

Your personal details e.g. age, gender, date of birth, ...

Your contact history for example sent and received communications such as e-

mail messages, ...

Your public data for example, publically available data such as social media

profiles, ...

Your payment details for example, if you make or receive payments to / from us

such as invoicing data, ...

C. Special categories of personal data

In principle, we will not have special categories of personal data (medical data, political opinions, religious or philosophical beliefs, trade union membership, ...) unless they are transferred to us with your explicit consent.

D. What are the legal grounds that we use to process your personal data?

We process personal data only for legitimate purposes, the processing will be increasingly supported by the processing grounds listed in the General Data Protection Regulation (hereinafter "AVG", also known as the "GDPR").

1. We generally process personal data because this is **necessary for the execution or termination of the agreement** with our customers and in order to provide you with our services.

For example, no advice with regards to taxation, corporate financing, simple econometrics can be given to the customer without this transferring us certain personal data. In the same sense, these services could not be purchased through the web shop.

2. In addition, we may process your personal data on the basis of our **legitimate interests** which, in specific cases, outweigh any possible harm to your rights.

For example, we think of sending marketing communications to you as one of our existing customers or former customers. Due to the nature of the available data and the fact that you already purchase or have purchased similar services from us, we judge that any possible disadvantage for your rights is very small, while we believe that the information provided may be of interest to you. Where we are on s based on this legal ground processing, we will be the effects that this may have limited your privacy by giving you the opportunity and simply stop the process immediately to sets and t.

3. Finally, we can handle w personally based on your **permission.** This authorization is to get distracted from the voluntary and directly providing your information to us whether orally, in writing or by electronic mail.

You may at any time revoke your consent by email to contact us. We ask you to always confirm a written withdrawal of your consent in writing, or to withdraw your consent by e-mail or by letter. The possibility to unsubscribe from e-mails sent to you for marketing purposes is provided at the bottom of every e-mail that we send out (so-called 'opt-out').

E. What do we collect your personal data for?

We collect your data for different purposes.

We process your personal data for the purposes described below or for which you have specifically given our consent. We no longer collect and process and no other types of data than those required for these purposes. If we wish to process your personal data for a purpose other than that for which the personal data has been obtained, we will contact you before further processing of that data.

We process your data for the following purposes:

Operational purposes for example to optimize our Website, to keep our services

user-friendly, to answer your contact question, ...

Business purposes for example, to communicate with you about our services

and to provide them and let them use you, to inform you about our policies, to develop and manage the

relationships with our potential and existing customers, ...

Commercial goals for example sending marketing communications by e-mail

or by mail or to register your registration at one of our events (seminars), registration to our newsletter, ...

Legal or legal purposes for example, we may use and store personal information

for legal reasons and procedures, to comply with legislation and government orders, or to comply with our internal and external auditing requirements, information security or to protect or enforce our rights, privacy, security or property or those from other people, ...

F. How long do we keep your personal data?

We do not store your personal data for longer than is necessary for the purpose for which the data were collected or processed.

Since the period for which the data can be tracked depends on the purposes for which the data were collected, the storage period may vary in each situation. Sometimes specific legislation will require us to keep the data for a specific period (in fiscal and administrative context, for example). Our retention periods for personal data are based on legal requirements and an assessment of your rights and expectations to which is useful and necessary for the provision of our services.

When it is no longer necessary to process your personal data, we will delete or anonymize your personal data. If this is not possible (technically or practically), for example because your data is stored in back-up archives or because we need it only for the administration that contains information about data subjects who do not want us to contact them again in the future, then we will save your data but we will not process it and remove it as soon as possible.

G. From whom do we receive your personal data?

We may obtain personal data from you directly, from public sources or from third parties.

In addition, some data is collected in an automated manner when using our Website by use of cookies (e.g. your IP address, web browser and operating system). For more information about this, we refer to VII. Cookies.

If we obtain your data from external sources, you should in principle have already been informed of the possible data transfer to us by this source itself. In any case, we will inform you of the processing of your data at the latest at the time of our first contact with you when we obtain your data from external sources and we process these as controller in our systems.

In addition to consulting public sources such as social media, the crossroad bank of companies, press releases and other publicly available information, we have partnerships with various partners such as companies specialized in supplying prospect lists and other data suppliers.

When we continue to process data from external sources for purposes other than those for which they were obtained, we will contact you and offer you our services and / or request your consent for the processing of your data so that you are informed of the processing of your data. data.

If this contact is made by telephone, we will send you an e-mail stating that your details will be processed in accordance with this privacy statement.

H. How do we protect your personal data?

We attach great importance to data protection and have the necessary physical and appropriate technical and organizational (precautionary) measures taken with a view op protecting your personal data against loss or any form of unlawful processing.

In the event of a personal data breach, we will follow all applicable reporting obligations with respect to such infringement.

I. With whom do we share your personal data?

We will not pass on your personal data to third parties, unless we are obliged to do so by law (e.g. cooperation in tax or criminal investigations), you consent to this or when it is necessary to achieve one of our a fore mentioned purposes.

In the context of our operational objectives (such as providing our services, managing our CRM or IT systems or executing any other (internal) business processes), we have engaged various external service providers for the processing of your personal data on our behalf, including:

- CCV Shop (web shop software). Personal data that you make available to us for the benefit of our services will be shared with this party. CCV S hop has access to your data to provide us (technical) support, they will not use your data for any other purpose. CCV S hop uses cookies to collect technical information regarding your use of the software, no personal data is collected and / or stored. CCV S hop reserves the right to share collected data within its own group in order to further improve the service.
- CCV Pay (online payment system). CCV Pay processes your name, address and residence details and your
 payment details such as your bank account or credit card number. CCV Pay reserves the right to use your data to
 further improve the service and to share (anonymized) data with third parties. In the case of an application for a
 deferred payment (credit facility) CCV Pay will share personal data and information regarding your financial
 position with credit rating agencies.

We will only share your personal data with this and / or others external service providers to the extent that this is necessary for the relevant purpose. Data may not be used by them for other commercial purposes. All service providers on behalf of would handle our personal information you are above contractually bound to ensure the protection and confidentiality of your personal information to the obligation to take appropriate technical and organizational measures (e.g. SSL encryption and strong password policy).

Some of these third parties may be located outside the European Economic Area ("EEA"). When we pass data to third parties outside the EEA, we ensure that the transfer of personal data take place t in accordance with the legislation and that there is adequate protection.

III. Rights of the person concerned

A. General

You dispose as a concerned about various rights regarding personal data processed by or on our behalf. We explain below which rights these are and how you can invoke these rights.

When you submit a request for the exercise of your rights or if you wish to receive your data at another e-mail address or by e-mail, for example, we will first and foremost verify your identity by requesting a copy of your identity card. We do this to prevent your data from ending up in the wrong hands.

We keep records of completed requests, in the case of a request for forgiveness we administer anonymous data. You will receive all copies and copies of data in the machine-readable data format that we use within our systems.

The exercise of your rights is in principle free of charge. If your request is manifestly unfounded or excessive, we can charge you a reasonable fee in the light of the administrative costs we incurred. In the same case, however, we can also choose not to respond to your request. You will always be informed of the reasons for this.

In any case, we will always inform you within 30 days (for simple requests) or 3 months (for complex or multiple requests) of the follow-up given to your request.

B. Your rights

If you wish to call on one of the following rights, please contact us using the details provided in section VI. Contact. You have the following rights:

- Right of inspection

You have the right to inspect the data that we process or have processed and which relate to your person or are traceable to it, and to obtain a copy thereof. If your request is granted, we will send you a copy of all data with an overview of the processors who have this data, with the e-mail address known to us, stating the category under which we have stored this data.

- Rectification right

You have the right to have the data that we process or have processed that relate to your person or that can be traced back to you if you believe that we have inaccurate information. If your request is granted, we will send you a confirmation that the details have been changed on the e-mail address known to us.

Right to data exchange

You have the right, if you wish, to ques our g and that we delete your personal data. However, we may still have to process that data for other purposes. If your request is granted, we will send confirmation to the e-mail address known to us that the data has been deleted and can therefore no longer be processed.

- Right to restriction

You have the right to limit the data that we process or have related to your person or that can be traced back to you. If your request is granted, we will send you a confirmation to the e-mail address known to us that the data until you cancel the restriction will no longer be processed.

Right of transferability

You have the right to have the data that we process or have processed and that relate to your person or that can be traced back to you, performed by another party. If your request is granted, we will send you copies or copies of all information about you that we have processed or that have been processed by us by other processors or third parties on the e-mail address known to us. In all likelihood, we will no longer be able to continue the service in such a case, because the secure linking of data files can then no longer be guaranteed.

- Right of objection and other rights

In such cases, you have the right to object to the processing of your personal data by or on behalf of us. If you object, we will immediately stop the data processing pending the settlement of your objection. If your objection is well-founded, we will make copies and / or copies of data that we process or have made available to you and then permanently discontinue the processing. You also have the right not to be subject to automated individual decision making or profiling. We do not process your data in such a way that this right applies. If you believe that this is the case, please contact us.

Please note, the exercise of the above rights may be subject to certain exceptions designed to protect the public interest, our interests and interests of other individuals.

IV. Complaints possibilities of the person concerned

Despite everything we do to protect your privacy and comply with applicable laws, you may not agree with the way we collect, use and / or process your personal data.

Of course you can always contact us in that case, but you also have other complaints options

You can submit a complaint to the supervisory authority, which you can contact via the details below

■ Via letter: Data Controllers Unit

Drukpersstraat 35 1000 Brussels Belgium

Via email: contact@apd-gba.be
 By phone: +32 (0) 2 274 48 00
 Via fax: +32 (0) 2 274 48 35

2) You can also, if you suffer damage, bring an action for damages to the competent court.

For more information regarding complaints and possibilities of redress, we invite you to consult the Website of the Data Protection Authority: http://www.databeschermingsautoriteit.be/klacht-en-beroep

V. Amendments

We reserve the right to make unilateral changes or modifications to this privacy statement. However, the most recent version is available at all times on our Website.

VI. Contact

Questions about the processing of your personal data and all requests regarding the exercise of your related rights or complaints can be directed to us:

■ Via letter: Mente Valiosa Consult BVBA

Ruiterlaan 5 9032 Wondelgem

Belgium

■ Via email: <u>kris@mente-valiosa.be</u>
■ By phone: +324 72 89 18 57

VII. Cookies

A. What are cookies?

We use cookies on our Website. Cookies are small data files that are stored s on your computer or other device when you visit our Website and typically used to optimize the usability of websites (or apps). We use cookies to:

- Keep track of and get reports on how you as a visitor our Website use t
- The use and functionalities of our Website to improve

For example, the contents of your shopping basket can be stored for a certain period of time.

Cookies can be placed by us as well as by other parties. When we allow others to our Website place cookies (see below 'third party cookies'), these parties have contractually guarantee a secure connection over which the data are exchanged.

B. Cookies from third parties

Google Analytics

Through our Website cookies are placed from the American company Google, as part of the "Analytics" service. This may be required to provide access to these data on the basis of applicable laws and regulations. We collect information about your browsing habits and share this information with Google. Google can interpret this information in conjunction with other datasets and thus track your movements on the internet. Google uses this information to provide, among other things, targeted advertising (AdWords) and other Google services and products.

CCV Shop

CCV Shop (web shop software) uses cookies to collect technical information regarding your use of the software, no personal data is collected and / or stored. CCV Shop reserves the right to share collected data within its own concern in order to further improve the service.

C. Permission and management of cookies

By accepting cookies on our Website, you agree with the use of cookies on our Website. You can disable or remove all installed cookies from your computer or other devices at any time via the settings of your browser (usually under 'help' or 'internet options').