



PRIVACY POLICY

Effective since:
25/05/2018

1. GENERAL WARNING

The EUROCRATS EVENT MANAGEMENT (private limited liability company), (hereinafter, « **QED**») does everything within its power to respect the privacy and secure the personal data it processes.

QED processes the personal data transmitted to it in accordance with the legislation in force, and, in particular, Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, applicable from 25 May 2018 (hereinafter the "**General Data Protection Regulation**").

By accessing the website www.spa30.eu (hereinafter, the "**Website**"), the Data Subject using the Website (hereinafter: the "**User**") fully and unreservedly accepts this Privacy Policy (hereinafter the "**Policy**"), as well as its general terms of use (hereinafter the "**Terms**") and the cookie policy (hereinafter, the "**Cookie Policy**").

The Data Subject acknowledges having read the information below and authorizes QED to process, in accordance with the provisions of the Policy, the personal data that he/she communicates on/through the Website.

The Policy is valid for all pages hosted on the Website and for the registrations of this Website. It is not valid for the pages hosted by third parties to which QED may refer and whose privacy policies may differ. QED cannot therefore be held responsible for any data processed on these websites or by them and urges you to check the privacy policies of the third party websites.



2. DATA CONTROLLER

2.1 Simply visiting the Website shall take place without having to provide any personal data, such as first name, surname, postal address, e-mail address, etc.

2.2 As part of a quote request, demand or the provision of our services, the Data Subject may be required to provide certain personal data. In this case, the data controller is:

EUROCRATS EVENT MANAGEMENT (private limited liability company) ("QED")

Rue de Spa 28

1000 Bruxelles

CBE-nr.: 0831.167.660

2.3 Any question regarding the processing of this data may be sent to the following address: info@spa30.eu.

3. DATA COLLECTED

3.1 By completing the quote request or contact form on the Website and using the Service, the Data Subject allows, in particular, QED to record and store, for the purposes mentioned in point 4, the following information:

- your identifying information (surname, first name, position, work title, e-mail address, telephone number and address);
- your bank details (credit card number, IBAN and BIC/SWIFT) and invoicing details;
- our communications (by email or other);
- the type of domain with which you connect to the Internet;
- the IP address assigned to you;
- the date and time of your access to our website;
- location data or other data relating to the communication;
- the pages you viewed on our website;
- the type of browser, platform and/or operating system you are using;
- the search engine and the keywords used to find the website;
- your browsing preferences.

3.2 The Data Subject also authorizes QED to record and store the following data for the purposes mentioned in point 4:

- information voluntarily provided by the Data Subject for a purpose specified in the Policy, the Terms, the Cookie Policy, on the Website or on any other medium of communication used by QED;
- additional information requested by QED to the Data Subject in order to identify him or to prevent him from violating any of the provisions of the Policy;

3.3 In order to facilitate browsing the Website as well as to optimize technical management, the Website may use "cookies". These "cookies" record, in particular:



- the Data Subject's browsing preferences;
- the date and time of access to the Website and other data related to traffic;
- the pages visited;

All information relating to "cookies" is included in QED's Cookie Policy.

3.4 When the Data Subject accesses the Website, the servers consulted automatically record certain data, such as:

- the type of domain with which the Data Subject connects to the Internet;
- the IP address assigned to the Data Subject (when connected);
- the date and time of access to the Website and other data related to traffic;
- location data or other data relating to the communication;
- the pages visited;
- the type of browser used;
- the platform and/or operating system used;
- the search engine as well as the keywords used to find the Website.

3.5 No nominative data identifying the Data Subject is collected through the cookies and servers consulted. This information is kept for statistical purposes only and to improve the Website.

4. PURPOSES OF PROCESSING THE DATA

QED collects, stores and uses personal data for the following purposes, in particular:

- to establish, carry out and conduct the contractual relationship with the Data Subject;
- to analyse, adapt and improve the content of the Website;
- to provide the Service;
- to allow the Data Subject to receive messages;
- to facilitate the availability and use of the Website;
- to personalize the Data Subject's experience on the Website;
- to respond to requests for information;
- for any marketing activities and promotions proposed by QED and/or the clients of QED to Data Subjects who have given their consent;
- to inform them about any changes on the Website and its features;
- for any other purpose to which the Data Subject has expressly consented.

The legal basis for the processing of your personal data is either your consent, the necessity for the performance of a contract and our legitimate interest to the extent that this complies with your interests, freedoms and fundamental rights.

We indeed have a legitimate interest to send you information about the Services, including to reply to your requests or to improve our services. The processing of your personal data can also be based on a legal obligation to which the controller is subject or in order protect the vital interests of the data subject or of another natural person.



For any processing activity based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

5. RIGHTS OF THE DATA SUBJECT

5.1 According to the regulations on the processing of personal data, the Data Subject has the following rights:

- **Right to be informed** about the purposes of the processing (see above) and the identity of the data controller.
- **Right of access and verification of data:** the Data Subject may, at any time, have access to the data that QED has on him or check if he is included in the database of QED.
- **Right of objection:** the Data Subject may, in some cases, object to the use of his data by QED.
- **Right of cancellation and/or modification:** the Data Subject may, at any time, notify QED of corrections to the data concerning him and, where appropriate, request the deletion of his personal data.
- **Right of limitation of processing:** the Data Subject may, in particular, obtain a limitation of processing when he has objected to the processing, when he disputes the accuracy of the data, or when he considers that the processing is illegal.
- **Right of portability:** The Data Subject has the right to receive the personal data that he has communicated to QED and may also ask to send this data to another data controller.

5.2 The Data Subject may, at any time, request access to his personal data, verify them, transfer them, and, in some cases as mentioned, limit their processing and rectify them. The Data Subject may also request rectification free of charge and, where applicable, request the deletion of all his personal data from QED's database - except those which QED has a legal obligation to keep on record - and object to the use and, where appropriate, request the limitation thereof.

In order to exercise his rights, the Data Subject needs to contact QED after which QED will provide a Subject Access Request Form. The Data Subject sends this completed form back to QED, accompanied by a copy of his identity card or his passport, to the data controller:

- by e-mail: info@spa30.eu
- by mail: Rue de Spa 28, 1000 Bruxelles

5.3 QED will then take the necessary steps to satisfy this request as soon as possible and in any case within one month of receipt of the application. If necessary, this period can be extended by two months, given the complexity and the number of requests.



6. RETENTION PERIOD

- 6.1** QED will keep the personal data of its contacts for the duration necessary to achieve the objectives pursued (see point 4).

7. COMPLAINT WITH THE SUPERVISORY AUTHORITY

If a Data Subject has any complaint or question about the processing of personal data by QED, we kindly ask you him/her contact QED. However, if no amicable solution could be reached, the Data Subject is informed that he has the right to lodge a complaint by contacting:

Data Protection Authority Brussels
Rue de la Presse, 35, 1000 Brussels
commission@privacycommission.be

8. SECURITY

- 8.1** QED has taken the appropriate organizational and technical measures to ensure a level of security adapted to the risk and that, to the extent possible, the servers hosting the personal data processed prevent:

- unauthorized access to or modification of this data;
- improper use or disclosure of such data;
- unlawful destruction or accidental loss of such data.

- 8.3** In this respect, employees of QED who have access to this data are subject to a strict confidentiality obligation. Nevertheless, QED may in no way be held liable in the event that this data is stolen or hijacked by a third party despite the security measures adopted.

- 8.4** Data Subjects undertake not to commit acts that may be contrary to this Policy, the Terms, the GTC, the Cookie Policy or, in general, the law. Violations of confidentiality, integrity and availability of information systems and data which are stored, processed or transmitted by these systems, or the attempt to commit one of these violations, shall be punishable by imprisonment of between three months and five years and a fine of between twenty-six euros and two hundred thousand euros, or one of these penalties only.

9. COMMUNICATION TO THIRD PARTIES

- 9.1** QED treats personal data as confidential information. It will not communicate them to third parties under any condition other than those specified in the Policy, such as to achieve the objectives set out and defined in point 4, or under the conditions in which the law requires it to do so.

- 9.2** QED may communicate its Data Subjects' personal information to third parties to the extent that such information is necessary for the performance of a contract with its Data Subjects. In such



case, these third parties will not communicate this information to other third parties, except in one of the two following situations:

- the communication of this information by such third parties to their suppliers or subcontractors to the extent necessary for the performance of the contract;
- where such third parties are obliged by the regulations in force to communicate certain information or documents to the competent authorities in the field of combating money laundering, as well as, in general, to any competent public authority.

9.3 The communication of this information to the aforementioned persons shall, in all circumstances, be limited to what is strictly necessary or required by the applicable regulations.

10. TRANSFER TO A NON-EU COUNTRY OR COMPANY

QED transfers data to a non-EU country or company only when that country provides an adequate level of protection within the meaning of the legislation in force, and, in particular the General Data Protection Regulation, or within the limits permitted by the legislation in force, for example by ensuring the protection of data by appropriate contractual provisions.

11. DIRECT MARKETING

11.1 We can use personal data for direct marketing purposes either if you have consented to such use by ticking the boxes provided for this purpose ("opt-in") or based on our legitimate interest.

11.2 In order not to receive any further direct marketing from QED, Data Subjects can unsubscribe from our email list by clicking the appropriate link below in each email or send their requests directly to us by writing to the following email address: info@spa30.eu.

12. NOTE CONCERNING MINORS

Persons under the age of 18 and persons who do not have full legal capacity are not intended to use the Website. QED asks them not to provide their personal data and will, in any case, delete the data of minors that would be communicated, f.e. through the Website..

13. UPDATES AND CHANGES TO THE POLICY

By informing Data Subjects through the Website or email, QED may modify and adapt the Policy, in particular to comply with any new legislation and/or regulations applicable (such as the General Data Protection Regulation applicable from 25 May 2018), the recommendations of the Belgian Privacy Commission, the guidelines, recommendations and best practices of the European Data Protection Board and the decisions of the courts and tribunals on this issue.

14. VALIDITY OF THE CONTRACTUAL CLAUSES

14.1 Failure by QED to invoke - at any given time - a provision of this Policy, may not be interpreted as a waiver to subsequently make use of its rights under the said provision.



14.2 The invalidity, expiration or the unenforceable nature of all or part of one of the above or below mentioned provisions shall not give rise to the invalidity of all the Policy. Any fully or partially invalid, lapsed or unenforceable provision shall be deemed not to have been written. QED undertakes to substitute this provision with another which, to the extent possible, fulfils the same objective.

15. APPLICABLE LAW AND COMPETENT COURT

15.1 The validity, interpretation and/or implementation of the Policy are subject to Belgian law, to the extent permitted by the provisions of applicable private international law.

15.2 In the event of a dispute relating to the validity, interpretation or implementation of the Policy, the courts and tribunals of Brussels have exclusive jurisdiction, to the extent permitted by the provisions of applicable private international law.

15.3 Before taking any step towards the judicial resolution of a dispute, the Data Subject and QED undertake to attempt to resolve it amicably. To this end, they shall first contact each other before resorting, where appropriate, to mediation, arbitration, or any other alternative method of dispute resolution.