# **Privacy policy and conditions**

Last update: 01/09/2022

#### 1. Welcome

We are Solentra, a non-profit organisation based at Sainctelette Square 17 - 1000 Brussels, with company number BE0475836567.

In this Privacy Policy, we explain what personal information we collect, and how we use and share it to improve our services.

#### 2. Personal data

The limited personal data we store, is collected in the following ways:

- Website and learning platform Solentra Academy: when you visit our
  website and learning platform Solentra Academy, certain data are recorded via
  cookies (including your IP address) for the proper functioning and improvement
  of our website. More information about these cookies can be found in our separate
  cookie policy.
- Business relationship: when you contact as a (potential) client or partner, we
  process your full name, contact details (e-mail address, phone number, office
  and/or residential address), and other data necessary for ordering, invoicing or
  cooperation (such as your bank details, contact history, or data related to your
  previous orders).
- **Marketing**: if you give us your explicit consent, we will process your full name and e-mail address to send you direct marketing, newsletters, actions and promotions concerning our products and services. You can easily unsubscribe at any time.

Although you are never obliged to disclose personal data, a refusal to communicate necessary information may hinder or make it impossible to provide our services.

## 3. Processing purposes

We process personal data as part of our general client and order management, or to provide our services. This includes client administration, tracking orders and deliveries, invoicing, answering queries, and for marketing purposes.

Processing takes place on the following categories of legal grounds:

- Based on your consent;
- Out of necessity for the performance of a contract;
- Out of necessity to comply with a legal obligation;
- To protect your vital interests or those of another person;
- For the performance of a task of public interest;
- Out of necessity to pursue our legitimate interests to do business.

Insofar as the processing of personal data takes place on the basis of your explicit consent, you always have the right to withdraw the consent given.

# 4. Sharing with third parties

If necessary for the achievement of the predefined purposes, we may share personal data with employees and our professional partners. In turn, our partners will take the necessary technical and organisational measures to protect this personal data.

We will never commercialise your personal data to third parties. However, in the context of any reorganisation, bankruptcy or transfer of operations, data that is part of our business activities may be transferred to third parties.

In limited cases, we may also be required to share personal data based on a court order or mandatory legislation, such as in the context of fraud prevention or security concerns, or to protect our rights.

## 5. Retention period

Personal data will be processed and retained by us for a reasonable period necessary for the fulfilment of the predefined purposes, in function of our contractual relationship, to comply with legal requirements, or under usual retention mechanisms that are reasonably limited in time (*backups*).

# 6. Your rights

All persons whose personal data we store are always entitled to:

- access their personal data;
- have their personal data corrected or completed if it is incorrect or incomplete;
- have their personal data deleted;
- have the processing of their personal data restricted;
- oppose the processing of their personal data for a serious and legitimate reason;
- have their personal data transferred to another company.

To exercise the above rights, please contact us by mail or at <a href="mailto:solentra@uzbrussel.be">solentra@uzbrussel.be</a>. Upon receipt of your request, we will need to be able to verify your identity.

## 7. Complaints

If you have any comments or questions about our privacy policy, we would love to hear from you.

All persons whose personal data we store also have the right to lodge a complaint with the Commission for the Protection of Privacy (Rue du Printing Press 35, 1000 Brussels, <a href="mailto:commission@privacycommission.be">commission@privacycommission.be</a>).

## 8. Safety

At the minimum, we apply the usual technical and organisational security measures that can reasonably be expected of us to protect your personal data against destruction, loss, alteration, falsification, dissemination or unauthorised access.

Personal data will only be transferred to a partner in a country outside the European Economic Area provided that country ensures an adequate level of protection of your personal data. Before sharing personal data with a partner in the United States of America, we require a separate processing agreement or certification according to the Privacy Shield Framework (www.privacyshield.gov).

We cannot be held liable for incorrect or unlawful use of personal data by a third party. In addition, you remain solely responsible for the confidentiality and use of your computer, IP address, login and identification data.

# 9. Your privacy

Your privacy is important to us.

We therefore make every effort to protect it as much as possible and attach great importance to compliance with (i) the Law of 8 December 1992 on the protection of privacy with respect to the processing of personal data (as amended by the Law of 11 December 1998, "Personal Data Processing Law"); (ii) the anti-spam provisions of Book XII of the Economic Law Code on the law of the electronic economy; and (iii) the European Regulation 2016/679 of 27 April 2016 on the protection of personal data ("General Data Protection Regulation").

# 10. Portrait rights

Solentra vzw sometimes takes photos or videos during activities to inform other interested parties about our activities via our website, newsletter and social media channels. We inform participants in activities about this in advance. If you

do not wish to have your photo taken, please let us know and we will respect your wishes. Solentra vzw is not responsible for visual material created and distributed by participants in activities. If we do accidentally use visual material in which you recognise yourself, please contact <a href="mailto:solentra@uzbrussel.be">solentra@uzbrussel.be</a> and we will remove the material.

## 11. Copyright

Our learning platform Solentra Academy is protected by copyright. That right covers all e-learnings, texts, photos, videos, layout, illustrations and other elements on this learning platform. Any copy, adaptation, translation or commercial use is prohibited unless prior written consent is given by Solentra vzw. Copyright infringement may be prosecuted under civil or criminal law.

#### 12. Content

We make every effort to keep the content on our website and learning platform accurate and up-to-date. However, if you do notice things that are incorrect or outdated, please inform us so that we can rectify this. Our website and learning platform contain links to other websites that we do not manage ourselves. We therefore do not guarantee the accuracy and availability of the information on those websites.