

PRIVACY POLICY

1. INTRODUCTION

1.1 GENERAL

The website www.constant-lier.com (hereinafter referred to as the "Website") is provided by AKMOS bv (hereinafter referred to as "we" and "us").

Any person who visits our Website, www.constant-lier.com (hereinafter referred to as the "Visitor"), as well as anyone who uses our services (hereinafter referred to as the "Customer"), inevitably discloses certain personal data. This personal data constitutes information that allows us to identify you as a natural person, regardless of whether we actually do so. You are identifiable as soon as it is possible to create a direct or indirect link between one or more personal data and you as a natural person. In addition to the Visitor or the Customer, this privacy statement also refers to "you/your".

When we process your personal data, the General Data Protection Regulation ("GDPR") and other relevant legal provisions apply. Any reference in this privacy statement to the GDPR is a reference to the Regulation of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation).

Through this privacy statement, we aim to inform you in a transparent manner about the processing activities that we, as the data controller, may carry out. In other words, when we decide "why" and "how" personal data is processed.

1.2 WHAT ARE PERSONAL DATA?

Personal data is defined in the GDPR as "any information relating to an identified or identifiable natural person." In simpler terms, personal data refers to any information about you that enables your identification. Personal data includes obvious information such as your name and contact details, but it also encompasses less apparent information such as identification numbers, electronic location data, and other online identifiers.

1.3 CHANGES

We may update this policy from time to time by publishing a new version on our Website. You can find the date of the current version at the bottom ("Last updated"). This may be necessary, for example, if the law changes or if we make changes that affect the protection of personal data. We recommend checking this page occasionally to ensure that you are satisfied with any changes in this privacy statement.

2. CONTACT INFORMATION

Our Website is provided and managed by AKMOS bv. We are registered in Belgium under company number 0473.827.182, and our registered office is located at Grote Markt 57, 2500 Lier.

- (a) by mail, to the postal address mentioned above;
- (b) through the contact form on our Website;
- (c) by phone, at +32 3 375 80 40;
- (d) by email, using congress@constant-lier.com

3. WHAT PERSONAL DATA IS PROCESSED AND HOW IS THIS DATA USED?

Depending on your role (Visitor or Customer), we may process the following personal data.

3.1 DATA PROCESSING

CATEGORIES OF PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS	RETENTION PERIOD
Technical data of Visitors through the use of (non-)essential cookies: IP address; geographic location; browser type and version; operating system; referral source; duration of your visit, page views, and website navigation paths, as well as information about the timing, frequency, and pattern of your use of the service.	The source of the technical data is the use of (1) non-essential cookies . The non-essential cookies containing technical data may be processed for the analysis and improvement of Website usage. For more information regarding cookies, please refer to our cookie banner.	Consent obtained through our cookie banner for non-essential cookies.	Cf. our Website's cookie banner .
	The source of the technical data is the use of (2) necessary cookies . The necessary cookies containing technical data are processed for the proper technical functioning of the website. For more information regarding cookies, please refer to our cookie banner.	Our legitimate interests, ensuring the proper technical functioning of the Website, providing you with the requested services, and preventing fraud or safeguarding the network and information security of our IT systems.	

CATEGORIES OF PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS	RETENTION PERIOD
<p>Communication Data of Visitors and/or Customers</p> <p>= All information you provide to us when you contact us.</p> <p>When you contact us through the contact form on the Website:</p> <ul style="list-style-type: none"> • name; • e-mail address; • telephone number; • subject; • message 	<p>The source of communication data is the information you provide to us when you contact us, for example, through the contact form on the Website.</p> <p>The communication data may be processed for the purpose of communication with you and its management.</p>	<p>Our legitimate interest, to be able to respond to your requests, questions or comments of any kind.</p>	<p>The data will be retained for a period of 2 years after the response.</p>
<p>Newsletter/direct marketing data of Visitors and/or Customers (direct marketing):</p> <ul style="list-style-type: none"> • first name; • last name; • e-mail address 	<p>For current Customers (i.e. customers with whom we currently have a contractual relationship or whose contractual relationship is not older than 2 years):</p> <p>The source of this data is the information you provide to us when you use our service.</p> <p>The data is processed to inform you about the same or similar services that we offer. You can unsubscribe at any time.</p> <p>For individuals who have subscribed to the newsletter themselves: the source of the newsletters data is the information you provide to us when you subscribe to our newsletter.</p>	<p>Our legitimate interest, so that we can send you newsletters about identical or similar services that we have provided for you.</p>	<p>The data will be retained until you object by unsubscribing or up until 2 years after the end of our contractual relationship.</p>

CATEGORIES OF PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS	RETENTION PERIOD
Customer Transaction Data: <ul style="list-style-type: none"> • contact information; • payment card and bank account details; • transaction details (e.g. payment timestamp, amount) 	<p>The source of the transaction data is the information you provide us when booking a space and potentially an event/service with us.</p> <p>The transaction data is processed for the purpose of delivering our services and maintaining proper records of those transactions.</p>	<p>Execution of a contract between you and us, or at your request, taking steps to enter into such a contract.</p>	<p>Personal data is retained during the contract. After termination of the contract, the personal data is kept for an additional 7 years to comply with legal obligations (tax obligations).</p>

Additionally, we may retain your personal data when necessary for the establishment, exercise, or defense of legal claims, whether in judicial proceedings or in an administrative or extrajudicial procedure. The legal basis for this processing is our legitimate interests, namely the protection and exercise of our legal rights.

3.2 PROCESSORS

A processor is a natural or legal person who processes personal data at the request of or on behalf of us. We may sometimes enter into a contract with such a party to provide certain products and/or services. In other words, we engage processors because it is necessary for our operations. In this case, we will enter into a written agreement with the processor to ensure that they also protect your personal data. The processor always acts according to our instructions.

We rely on the following categories of processors:

- Companies we have engaged for marketing purposes (e.g., for sending newsletters).
- Companies we have engaged for ICT technical support and hosting purposes.
- Companies we have engaged for administrative purposes (CRM system).
- Companies we have engaged for communication purposes (email providers, etc.).
- Companies we have engaged for analytical purposes.
- Companies we have engaged for payment purposes.

4. PROVIDING PERSONAL DATA TO THIRD PARTIES

We will not share your personal data with third parties (other than processors) for any purposes unless for the following exceptions.

In certain circumstances, we may be legally obligated to share certain personal data, including yours, if we are involved in a legal proceeding or to comply with legal obligations, a court order, or the instructions of a government authority.

5. INTERNATIONAL TRANSFER (OUTSIDE EEA) OF YOUR PERSONAL DATA

We may store or transfer your personal data, in whole or in part, to countries that are not part of the European Economic Area (the "EEA" includes all EU member states, Norway, Iceland, and Liechtenstein). These countries are referred to as "third countries" and may have less stringent data protection laws compared to those in the EEA. This means that we take additional steps to ensure that your personal data is treated as securely and reliably as in the EEA.

We use specific contracts with external third parties that have been approved by the European Commission (also known as the Standard Contractual Clauses: SCC) for the transfer of personal data to third countries. The SCCs guarantee the same level of data protection as would apply under the GDPR framework. In addition, additional measures are taken to protect your data from unauthorized access. More information is available from the European Commission.

6. YOUR RIGHTS

Some rights are complex, and not all details are included herein. Therefore, please refer to the relevant provisions and guidelines of supervisory authorities for a complete explanation of these rights.

You can exercise your rights regarding your personal data by submitting a written notice to us via congress@constant-lier.com.

We will respond to your request within one month after receiving it. Normally, we aim to provide a complete response within that time. However, in some cases, especially if your request is more complex, it may require more time, up to a maximum of three months from the date of receiving your request. You will be kept informed of the progress.

6.1 THE RIGHT OF ACCESS

You have the right to confirm whether or not we are processing your personal data and, if we are, to access the personal data along with certain additional information. This additional information includes details about the purpose of the processing, the categories of personal data concerned, and the recipients of the personal data. Provided that the rights and freedoms of others are not affected, we will provide you with a copy of your personal data. The first copy will be provided free of charge, but additional copies may be provided at a reasonable fee.

6.2 THE RIGHT OF RECTIFICATION

You have the right to have any incorrect personal data about you corrected and, considering the purposes of the processing, to have any incomplete personal data about you completed.

6.3 THE RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

In certain cases, you have the right to have your personal data erased without undue delay. These circumstances include:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- You withdraw your consent for processing based on consent.
- You object to the processing under certain rules of the applicable data protection law (the GDPR).
- The processing is for direct marketing purposes.
- The personal data has been unlawfully processed.
- The personal data has been collected in connection with the offer of information society services to a child based on consent.
- The personal data must be erased to comply with a legal obligation.

However, there are exclusions to the right to erasure. General exclusions include where processing is necessary:

- For exercising the right of freedom of expression and information.
- For compliance with a legal obligation that we are subject to.
- For the establishment, exercise, or defense of legal claims.
- For archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.
- For reasons of public interest in the area of public health.

6.4 THE RIGHT TO RESTRICT PROCESSING

In some cases, you have the right to restrict the processing of your personal data. These circumstances are: you contest the accuracy of the personal data; the processing is unlawful, but you oppose erasure; we no longer need the personal data for our processing, but you need it for the establishment, exercise, or defense of legal claims; and you have objected to the processing, pending the verification of that objection.

If processing is restricted on this basis, we may continue to store your personal data. However, we will only process it in other ways: with your consent; for the establishment, exercise, or defense of legal claims; to protect the rights of another natural or legal person; or for reasons of significant public interest.

6.5 THE RIGHT TO OBJECT PROCESSING

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. If you raise such an objection, we will cease processing the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or if the processing is intended for the establishment, exercise, or defense of legal claims.

Additionally, you have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you object to this, we will cease processing your personal data for this purpose.

Furthermore, you have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation unless the processing is necessary for the performance of a task carried out in the public interest.

6.6 THE RIGHT TO DATA PORTABILITY

To the extent that the legal basis for our processing of your personal data is based on:

(a) consent;

(b) the processing is necessary for the performance of a contract to which you are a party or for taking pre-contractual measures at your request;

or (c) the processing is carried out by automated means,

you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format.

However, this right does not apply if it would adversely affect the rights and freedoms of others.

6.7 THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you believe that our processing of your personal data is in violation of the General Data Protection Regulation (GDPR), you have the right to lodge a complaint with a supervisory authority responsible for data protection. In Belgium, the supervisory authority is the Data Protection Authority (GBA). Individuals from other EU member states have the right to lodge a complaint with their own national supervisory authority. For an overview of the contact details of these authorities, please consult this webpage: https://edpb.europa.eu/about-edpb/about-edpb/members_en

Data Protection Authority (GBA)

Drukpersstraat 35

1000 Brussel

+32 (0)2 274 48 00

contact@apd-gba.be

<https://www.gegevensbeschermingsautoriteit.be>

6.8 THE RIGHT TO WITHDRAW YOUR CONSENT

have the right to withdraw this consent at any time. The withdrawal of consent does not affect the lawfulness of the processing before the withdrawal.

Last update: May 22, 2023