

DATA PROTECTION POLICY

1 Processing Manager

BVBA Koenraad FLAMANT, VAT BE 0429.021.991, LEUVEN commercial register, registered office located at Stationstraat 58, 3070 KORTENBERG (hereafter referred to as **KF**), Managing Director *Koenraad Flamant*.

KF uses 2 company names: BXL.LEGAL & DATAPROTECTIONOFFICER.LEGAL.

With the BXL.LEGAL division KF primarily develops the company's legal consultancy services and the interim and crisis management, for the following sectors, for example: Real Estate, Agreements and Business Law, Companies and Negotiations.

DATAPROTECTIONOFFICER.LEGAL is the name KF uses when acting as a certified Data Protection Officer for the business activities within the sectors in which Koenraad Flamant, as Managing Director, operates: GDPR (AVG) & Privacy, IT and Intellectual Property.

Even though Koenraad Flamant is a Data Protection Officer (DPO), KF has not appointed a DPO as this is not a legal requirement.

We prefer to collect the least possible data about you. However, sometimes we really have to in order to be able to contact you when you need advice, for example. We always take care to process your details with care, and we do our utmost to ensure that your data are protected.

We are proud to offer you the following data protection guarantees:

- 1) In all our business transactions, confidentiality and safeguarding trade secrets feature as a top priority.
- 2) We therefore never share your personal details without good reason.
- 3) We protect your personal details as if they were our own.
- 4) We only use your personal details for the purposes clearly described below.

2 Purposes of Data Processing and Legal Requirements

2.1 To ensure performance of an agreement between KF and yourselves

We only process your data for the purpose of our consultancy business, because you use our services as a client and/or because you supply them to us yourself and/or because you are the counterparty of one of my clients.

Please find below an overview of the personal details processed by us:

Name and Address

We process your name because we prefer to address you by your name instead of using some type of code. Without your address, we would not be able to invoice you for our services. These details are often necessary to enable us to provide you with a service, such as drawing up an agreement, a notice of objection, etc. Without your address, we would not be able to attend your BBQ either, providing we were invited, of course...

Date of Birth

In some cases, we require a unique identification method. Your date of birth or national identity number solves that problem.

E-mail Address

We need your e-mail address to communicate with you.

It enables us to keep you informed of the status of your case files, or we may request additional documents, and you can also ask us questions. We also prefer to send our invoices by e-mail.

Furthermore, it also provides us with a means of communication to keep you informed of any activities which we might be organising, and also information that might be of interest to you.

Telephone Numbers

We need your telephone number to contact you if we need additional information, to invite you to a meeting, etc. You also receive my number for that same reason, and naturally with a view to receiving an invitation to that BBQ.

Payment Details

We process your payment details through our banking institutions.

“Special” Personal Details

As part of our services, we are sometimes also privy to ‘special’ personal information that helps to identify you.

- Memberships of service and sports clubs and other associations
- Information about your assets
- Information about your family members
- Information about legal proceedings

If you prefer not to divulge this type of information, then it would be extremely difficult for me to assist you. It would be impossible even.

2.2 Due to Legal Requirements

As a legal consultant, and as a DPO, I do have to comply with a number of legal requirements. Hence, this may result in requests for data, which will then also be processed. One of these obligations stems from the anti-money laundering legislation.

3 Sharing Data with Third Parties

We will only share your details with others in the following cases:

- To provide and perform our services
- For payment services to facilitate various methods of payment
- To comply with a legal obligation

Your details will only be passed to data processors, who are working upon strict instructions from KF. They can only process the data for the aforementioned purposes of KF, based on a data processing agreement.

KF will only provide information to third parties if this is necessary for the performance of our services or in order to comply with a legal obligation.

Just to re-assure you, we will never sell your details to anyone for whatever reason. Quite simply - never.

4 Storage Period

KF will process the details for as long as you are a client of ours. In principle, KF will store your details for a period of two years after you cease to be a client.

As an exception, KF is obliged:

- a) To keep accountancy details for a period of seven years, e.g. invoicing information
- b) In principle, we have to store the details relating to our potential liability for our services for 10 years
- c) We will keep the details relating to our potential liability arising from the GDPR (if the Act of 3 December to set up the Data Protection Authority is applicable) for a period of 5 years.

5 Rights of the Person Concerned

You have:

- The right to view your details processed by KF, and to have these details amended.
- The right to have your details processed by KF deleted and restricted, to the extent that it meets the purposes of the processing operation.
- The right to lodge a complaint with the data protection authority.
- The right to be informed of any amendment to this data protection policy.

Please feel free to e-mail me on privacy@bxllegal.be or privacy@dataprotectionofficer.legal with a request to view your details, or to have them amended or deleted. In order to ensure that it is indeed you submitting this request, we will ask you to forward a copy of your I.D. card with your request. (Do please blacken out your passport photo and I.D. card no. (etc.), in order to protect your data).

We will reply as soon as possible, in any case within 30 days.

If the purposes for processing or if this notification were to be amended, the DPO professional will communicate this to you beforehand.

6 KF Websites

KF makes minimum use of technical and functional cookies on its websites. A cookie is a small text file that is stored upon your computer, tablet or smartphone during your first visit to the website. The cookies used by us on our websites are necessary for technical reasons, and to ensure user-friendliness. They ensure the smooth running of the websites.

7 Securing Your Details

We are extremely serious about protecting your details, and we take all the appropriate technical and procedural measures in order to prevent any misuse, loss, unauthorised access, undesirable publication and unauthorised amendment.

If you think your personal details have been misused, please inform us of this as soon as possible by e-mail: privacy@bxllegal.be or privacy@dataprotectionofficer.legal

8 Contact Details

Please do not hesitate to contact us with any queries concerning your rights and/or the processing of your personal details, or any queries concerning your personal details. We would prefer if you contacted us by e-mail for such matters: privacy@bxllegal.be or privacy@dataprotectionofficer.legal.

Kortenbergh, 1 February 2018