

## **PRIVACY POLICY OF DELTA DIFFUSION SA**

The purpose of this policy is to indicate how our company collects, uses and protects your personal data (being defined as any data that relates to an identified or identifiable individual or a person who may be identified by means reasonably likely to be used) in the context of the use that you make of our services and this website. This use is made in accordance with the applicable laws and regulations, including the European Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter: the 'General Data Protection Regulation' 'or' GDPR '), applicable from 25 May 2018 and the Belgian legislation on data protection and its implementing decrees

### **1. WHO IS PROCESSING YOUR DATA?**

The company responsible for processing the personal data relating to you and as collected when making use of our services and on this website is delta diffusion SA, with registered office at 1457 Nil saint Vincent - Chaussee de Namur 39 b 201 - Belgium and company number 0439.626.071. hereinafter referred to as "our company" or "we".

### **2. WHAT TYPES OF INFORMATION DO WE COLLECT?**

We collect the information and data you provide us when you use our services and our website as well as information that you do not provide directly to us but are collected when using our website, such as time and duration connection etc, if you:

- Subscribe to our newsletter;
- Use our contact form;
- Participates in surveys or competitions;
- When sending a complaint through our complaint form;
- When using our website;

When you subscribe to our newsletter: we collect your name and e-mail address.

When you use our contact form: we collect the information you provide in the contact form, including your name, first name, address, e-mail address, and telephone number.

If you participate in surveys or competitions: we collect the information you provide us with in the survey or competition forms, including your name, first name and contact details.

When you send a complaint as a customer: we collect the information that you provide in the complaint form, including your name, first name, e-mail and if you provide it your telephone number.

When our website uses cookies: we collect information about your areas of interest, your activity on the website and e-shop, your purchase or orders, the duration of your connection, date, time, etc. This data is not linked to contact details or other personal details. For more information about our cookies please consult our cookie policy on our website [www.doomoo.com](http://www.doomoo.com)

### 3. HOW AND WHY DO WE USE YOUR DATA?

Our company always collects and processes your personal data on the basis of one of the criteria provided by the law with a view to lawful processing. This processing has the following objectives:

- to provide the information you request and supply products / services you request and to handle complaints, and to guarantee a good after-sales service;
- improve your experience on our website, in particular by remembering your preferences and interests so that you are immediately presented with the products that best suit you and to treat any complaint related to this;
- to communicate with you e.g. via our newsletter to inform you about our offers and temporary offers and to keep you informed of any events;
- to conduct our marketing and advertising campaigns;
- to prevent fraud;
- to ensure the security of the website;
- to carry out statistical analyses in relation to our customers, such as visiting and clicking behaviour on our website, so that our services and products can be evaluated and, for example, we check whether our campaigns are effective. To process your personal data, our company always relies:
  - either on the permission you have given in this context, explicitly (by checking the box provided for this purpose when surfing to our website or subscribing to our newsletter), or implicitly, whereby your permission is derived from your behavior on our website (e.g. by choosing to contact us using the contact form). In both cases, permission is always free and you always have the option to withdraw your consent;
  - or on another criterion provided for by law: e.g. if the data collection is necessary for the purpose of complying with a legal obligation to which we are subject. In certain cases, the processing of your data may also be necessary to safeguard your essential interests or to achieve the legitimate interest of our company. Our company basically does not share your data with third parties, except - and by way of exception - in certain cases this information can be communicated to third parties, e.g. third parties who provide us services or who provide services on our behalf and for our account. This may involve marketing agencies or statistics management such as Google Analytics. Calling on such service providers and communicating your information helps us to provide and improve our services. Our company has entered into processor agreements with these third parties. Moreover, our company is obliged to communicate your personal data when this is imposed by law, decree or ordinance or by a court decision. In any case, we undertake to ensure the confidentiality of your data and compliance with the GDPR, in particular by concluding appropriate processor agreements with partners and third parties.

#### **4. HOW CAN YOU MANAGE YOUR DATA / DO YOU GET ACCESS TO YOUR DATA AND CAN YOU DELETE IT?**

You have the right to access and view your data, the right to correct your data or request correction of your data, the right to delete your data, the right to oppose the processing of your data or against profiling, the right to limit the processing of your data and the right to transfer your data. In accordance with the applicable laws, you have the right to:

- consult and access your data and the essential information regarding processing (processing purposes, categories of data that are processed, etc.);
- to request that such data be corrected or rectified or, if necessary, deleted on the terms set out in Article 17 of the GDPR, and in particular when those data are no longer necessary for the purposes for which they were collected / processed or when you withdraw your consent;
- oppose the processing of the data relating to you in certain specific cases as described in Article 21 of the GDPR, including processing for direct marketing purposes; in that case we will no longer process your data, except for legitimate and compelling reasons that outweigh your interests and rights and freedoms or if the processing relates to the institution, exercise or substantiation of a legal claim;
- to oppose automated individual decision-making, including profiling, on the conditions stipulated in article 22 of the GDPR;
- to request the limitation of processing, in certain cases as set out in Article 18 of the GDPR and in particular when you dispute the accuracy of the data, for a period that allows us to check the correctness of the data; and
- receive your personal data in a form that allows them to be transferred, in particular to transfer them to another controller, under the conditions set out in Article 20 of the GDPR and, if technically possible, to obtain the data directly transferred from one controller to another (right to data portability). You can exercise these rights by sending a written request, either by e-mail to the address [info@doomoo.com](mailto:info@doomoo.com) or by post to the address Chausse de Namur 39, B201 - 1457 Nil-Saint-Vincent. Complaints in case of violation of the applicable Belgian rules concerning the protection of personal data can be addressed to the Belgian Commission for the protection of privacy at the address [commission@privacycommission.be](mailto:commission@privacycommission.be)

#### **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

Your data will never be saved longer than necessary. The period during which your data is retained will in any case never be longer than is necessary to realize the purposes for which your data is collected. The collected data is retained for as long as is necessary to provide our services and for the purposes described in point 3 above. The period during which your data will be saved will in any case never be longer than :

- the duration on which you are subscribed to our newsletter
- 6 months after handling a complaint
- 6 months after the end of the competition

## **6. WILL YOUR INFORMATION BE TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?**

Our company keeps all your data on servers within the European Economic Area so that its protection is fully secured. In certain cases, your data may be transferred outside the European Economic Area if we choose to outsource work. Because doomoo lacks certain knowledge or because knowledge of others is more effective. Such transfer may be carried out through service providers established outside the territory or through a server located outside this territory. We undertake to transfer your data only to countries outside the EEA in the following three cases: if legally permitted (in accordance with article 49 GDPR), when you have given specific permission to forward certain data to an explicitly indicated country stating that, according to the European Commission, this country does not have the appropriate legislation for the protection of personal data and the transfer risks for you (in accordance with article 13-14 GDPR) or when we guarantee appropriate safeguards for the data protection in the host country. In this respect, our company undertakes to always ensure an appropriate and sufficient level of protection for your data, in particular by using standard contractual provisions approved by the European Commission, binding company regulations as provided for in Article 47 of the GDPR, an approved code of conduct, certification or other means that comply with Belgian and European legislation on the protection of personal data.

## **7. HOW DO WE GUARANTEE THE SECURITY OF YOUR DATA?**

We take technical, organizational, administrative and physical measures to fully guarantee the protection of your data against possible destruction, loss or modification in accordance with the applicable laws, more specifically Article 5 and 32 GDPR.

Our company takes the following measures:

- Login password management
- Screening of spaces with sensitive content
- Enter into processor agreements with processors
- Up to date and secure software
- Guarantee information and training of GDPR compliance to our personnel
- ...

At regular intervals, the effectiveness of these measures is tested, assessed and evaluated.

## **8. HOW WILL YOU BE INFORMED OF CHANGES TO THIS PRIVACY POLICY?**

You will find the date of the last changes to this policy at the end of this page. This privacy policy can be changed on occasion without us notifying you in advance. We therefore recommend that you consult this policy regularly.

## **9. HOW CAN YOU CONTACT US?**

You can contact us for more information or if you want to submit a complaint:

- through the contact form on our website
- via e-mail at the address [info@doomoo.com](mailto:info@doomoo.com);
- by post at the address Chaussee de Namur 39 b201; or

- by telephone on the number +32 10 65 19 90.

**Date last modification: 29/05/2020**