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**INFORMATIVE NOTE  
CONCERNING DATA PROTECTION  
ASPAC INTERNATIONAL B.V**

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## **1. INTRODUCTION**

ASPAC International B.V., whose registered office is located at Middenhutlaan 1, 1640 Sint-Genesius-Rode - Belgium and registered in the Carrefour Bank of Enterprises under the company number 871179566 attaches great importance to the secure, transparent and confidential collection and processing of your personal data. In particular, we want to protect the data of our customers, subcontractors and suppliers, notably, against losses, violations, errors, unauthorized access or unlawful processing.

With this Privacy Notice, we want to inform you about the collection and processing of your personal data.

We ask you to read this Privacy Notice carefully as it contains important information about how we process your personal data and why we do so.

By providing your personal data, you expressly acknowledge having read this information note and you explicitly agree to its content as well as to the processing of your personal data.

## **2. SCOPE**

This information note on data protection applies to all the services provided by us and more generally all the activities we carry out.

## **3. RESPONSIBLE FOR TREATMENT AND ITS COMMITMENTS**

ASPAC International B.V., whose registered office is located at Middenhutlaan 1, 1640 Sint-Genesius-Rode - Belgium and having the company number 871179566 is responsible for the treatment of your personal data.

In the collection and processing of your personal data, we comply with the Belgian legislation on the protection of personal data, as well as the European Regulation (EU) 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 (hereinafter GDPR).

## **4. PERSONAL DATA**

Depending on your activities and the relationship with our company, you will provide us with the following personal data: your identity and contact details (name, title, address, e-mail address, telephone number, mobile phone number, financial account number, etc.).

The people who send us their application by e-mail or via our website may also provide us with other personal data such as: date of birth, education, gender, professional experience and skills, language proficiency, driving license, referees, as well as any additional information contained in their C.V.



Companies will provide us with their name, address, VAT number, financial bank account number, and the data of contact persons or employees (first and last name, gender, language, land line number, telefax number, e-mail address, etc.).

We would like to point out that you are responsible for all the data you provide to us and we rely on their accuracy. If your data is out of date or incomplete, we ask you to inform us immediately.

You are not obliged to disclose your personal data but, in this case, you must understand that we will not be able to offer you certain services or collaborate with you or your company if you do not consent to the collection and processing of certain data.

## **5. THE PURPOSES OF THE TREATMENT AND THE LEGAL GROUNDS**

### **5.1. Customers data**

As part of our services and activities, we collect and process identity data and contact information from our customers and principals, their staff, associates, agents and other relevant contacts. The purposes of these treatments are the execution of agreements with our customers, customer management, and accounting / tax obligations. The legal bases are the execution of a contract, the respect of legal and regulatory obligations and / or our legitimate interest.

### **5.2. Data from suppliers, subcontractors and service providers**

We collect and process identity data and contact information of our suppliers, subcontractors, and service providers as well as their potential (sub)sub-contractors, their staff, associates, agents and any other relevant contact persons. The purposes of these treatments are the execution of agreements and contracts, the management of suppliers / subcontractors / service providers, the accounting / tax obligations. The legal bases are the execution of the contract, the respect of legal and regulatory obligations and / or our legitimate interest

### **5.3. Data from staff**

We process the personal data of our employees as part of our personnel management and salary management. Due to its specific nature, this treatment is more elaborately addressed in a Data Protection Policy for Employees.

### **5.4. Other Data**

In addition to the data of customers, suppliers / subcontractors and staff, we also process the personal data of other people, such as new customers / prospects, useful contacts within our sector, networking contacts, contacts experts, people applying for a job or an internship in response to a call for applications or spontaneous application, etc. The purposes of these treatments are in the interest of our activities, direct prospecting and public relations. The legal basis is our legitimate interest or in some cases the performance of a contract, or based on prior consent.

## **6. TREATMENT DURATION**

Personal data are stored and processed by us for a necessary period depending on the purpose of the processing and the relationship (contractual or otherwise) between us.



Data from customers and suppliers or subcontractors will, in any case, be withdrawn from our systems after 10 years after the termination of the contract, or after the end of the project, except for the personal data which we are required to keep for longer on the basis of specific legislation or in the event of ongoing litigation for which personal data are necessary.

## 7. RIGHTS

In conformity with and in accordance with the conditions of the Belgian data protection law and the provisions of the General Data Protection Regulation, we hereby inform you that you have the following rights:

Right of access: you have the right to know (free of charge) the data that we hold about you and to verify for what purpose they are used.

Right to rectification: you have the right to obtain a correction of the erroneous personal data concerning you, as well as the right to supplement incomplete personal data.

Right to erasure (right to be forgotten): you have the right to ask us to erase your personal data and to restrict the processing of such data in the circumstances and under the conditions stipulated in the General Data Protection Regulation. We may refuse the deletion or limitation of the data necessary for us to process wages, the performance of a legal obligation, the fulfillment of the employment contract or our legitimate interest, provided that such data is necessary for the purposes for which they were collected.

Right to data portability: you have the right to receive the personal data about you that you have provided, in a structured, commonly used and machine-readable format. You have the right to transmit this data to another controller.

Right to object: you have the right to object to the processing of your personal data for serious and legitimate reasons. You cannot, however, object to the processing of the data necessary for us to fulfill a legal obligation, the fulfillment of the employment contract or our legitimate interest, provided that such data is necessary for the purposes for which they were collected.

Right to withdraw consent: If the processing of personal data is based on prior consent, you have the right to withdraw that consent. This personal data will then be processed only if we have another legal basis.

Automated individual decision-making, and profiling: we confirm that the processing of personal data does not include profiling and that you will not be subject to fully automated decisions.

You may exercise the aforementioned rights by sending a dated and signed request, accompanied by a copy of both sides of your identity card, by post to ASPAC International B.V., Middenhutlaan 1, 1640 Sint-Genesius-Rode - Belgium, or by email to Mr. François HAUMAN: [fhauman@aspacintl.com](mailto:fhauman@aspacintl.com)



We are making every effort to ensure the meticulous and legitimate processing of your personal data, in conformity with the applicable regulations. If, however, you feel that your rights have not been respected and you feel that your concerns are not being heard in our company, you are free to send a complaint to:

Commission for the protection of privacy  
Rue de la Presse 35, 1000 Brussels, Belgium  
Tel. +32 (0)2 274 48 00  
Fax. +32 (0)2 274 48 35  
E-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)

You have also the right to lodge a complaint to a competent court if you consider that you suffer damage caused by the unauthorized processing of your personal data.

## **8. TRANSFERS OF DATA TO THIRD PARTIES**

Certain personal data of the Workers collected by the Employer, will be transferred to and may be processed by third parties, such as our IT provider, accountant, auditor, social secretariat, as well as by the Government.

It is possible that one or more of the third parties are outside the European Economic Area ("EEA"). However, personal data will only be transmitted to third countries with an adequate level of protection.

The workers, managers and / or representatives of the aforementioned service providers or institutions as well as the specialized service providers designated by them, are required to respect the confidential nature of your personal data and may use this data only in purposes for which they were provided.

If necessary, personal data may be transmitted to other third parties. This can be done in the event of a partial or complete reorganization on our part, if our activities are transferred or in the event of a declaration of bankruptcy. It is also possible that the personal data must be transferred because of an injunction or in order to fulfill a particular legal obligation. In this case, we will endeavor as far as possible to inform you in advance of this communication to other third parties. You acknowledge and understand, however, that under certain circumstances this is not always technically or commercially feasible, or that legal limitations may apply.

We will not sell your personal data and we will not make them available to direct marketing offices or similar service providers, except with your prior agreement.

## **9. TECHNICAL & ORGANISATIONAL MEASURES**

We will take technical and organizational measures to process the data to a sufficient level of security and to protect personal data against any destruction, loss, falsification, unauthorized access or third-party notification by mistake, as well as any unauthorized processing. authorized of these data

In no event will ASPAC International B.V. be held liable for any direct or indirect damage caused by the incorrect or unlawful use of personal data by a third party.

## **10. ACCESS OF YOUR PERSONAL DATA BY OUR STAFF**

Given the processing of your personal data, we allow access to your personal data to our employees, employees and agents. We guarantee an identical level of protection by imposing contractual obligations on these workers, employees and agents, similar to those described in the Employee Data Protection Policy.



## **11. DO YOU HAVE ANY QUESTIONS?**

If you still have questions about the collection and processing of your personal data after reading this Privacy Notice, you may send us a dated and signed request with a double-sided copy of your identity card, by mail to ASPAC International B.V., Middenhutlaan 1, 1640 Sint-Genesius-Rode - Belgium, or by e-mail to François HAUMAN: [fhauman@aspacintl.com](mailto:fhauman@aspacintl.com)