

# PRIVACY POLICY

## **GENERAL INFORMATION**

This website is the property of Vlitix bv, with registered office at Berkenmei 65, 2350 Vosselaar and company number BE 0638.951.272 (hereinafter referred to as “Vlitix”).

As Vlitix sets great store by the privacy of its website’s users, clients, and contacts, it is committed to protecting your personal data. This means that we do everything in our power to protect your privacy to the extent possible to ensure that your data are in safe hands and will not be misused.

In fact, Vlitix processes your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (The General Data Protection Regulation, hereinafter: GDPR) and the Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

When you visit our website, when we execute an order on your behalf or when we communicate with you, you are likely to share personal information with us that does not only enable us to identify you as an individual (e.g., your surname and first name, your email address, your home address, your landline or mobile number, etc.) but also allows us to answer your questions or provide you with services. These are the personal data discussed below. By using our website [www.vlitix.com](http://www.vlitix.com) and/or availing of our services you unconditionally accept this privacy policy, including the general terms of use.

## **WHAT IS MEANT BY “PROCESSING OF DATA” AND WHO IS RESPONSIBLE FOR IT?**

It means any processing of personal data. This concept inter alia includes any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, the retrieval, consultation, disclosure by transmission, dissemination or otherwise making available, the alignment or combination, restriction, erasure, or destruction of data.

Personal data are processed via this website and by any other means Vlitix may receive these data, such as by email, post or via registration forms.

Vlitix is responsible for the processing of your personal data.

## PURPOSES OF AND LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

Personal data are processed on the basis of article 6.1 GDPR.

Vlitix processes your personal data for the following purposes:

- To verify your (personal) data when you log on to your website or web shop's account; this includes taking measures and putting provisions in place to protect your personal data;
- To check your capacity as an "undertaking", i.e. to cross-check your data with the Crossroads Bank for Enterprises;
- To supply you with the products/services offered via our website or any other route and to invoice you for them;
- To check your or your undertaking's creditworthiness;
- To administer our website and web shop at a technical level and for customer administration purposes.

In addition, Vlitix also processes your personal data if required to pursue our or a third party's legitimate interests, inter alia for any one of the following purposes:

- To exercise fundamental rights, inter alia to bring a legal action, whether by us or by a third party;
- To keep you up to speed on any special offers or innovations, either or not on the basis of pseudonymised user profiles;
- To provide you with personal advice via our newsletters, for one, by devising pseudonymised user profiles and personalising our offers based on your browsing behaviour;
- To check your capacity as an "undertaking";
- To check your or your undertaking's creditworthiness;
- To prevent the fraudulent use of our website and web shop;
- To prospect for new clients and for marketing purposes.

Furthermore, by agreeing to this privacy policy, you consent to your personal data being processed for the following purposes:

- To contact you to answer your question or address your comment, both by email and by phone;
- To keep you up to speed on any special offers or innovations, either or not on the basis of pseudonymised user profiles;
- To produce statistics on the number of visitors to the various sections of the website after the personal data have been anonymised;
- To process your job application;
- To offer or execute our services;
- For any other purposes you consent to.

If Vlitix plans to process your personal data for a purpose not provided for in this privacy policy, we will contact you at the email address you supplied to inform you of this new processing operation and its purpose. It goes without saying that you are free to withhold your consent to any such processing operation.

The legal bases in virtue of which Vlitix processes your personal data are as follows:

- The consent we obtained from you to process your personal data;
- The need to execute a contract you are party to;
- The need to comply with a legal obligation incumbent on us;
- The need to protect your or any natural person's vital interests.

Please note that certain of our website's functionalities will not be available to you if you prefer not to share your personal data with us or if you refuse to accept certain cookies.

You are always entitled to revoke your earlier consent. You can do so by post or by email, with proof of your identity enclosed/attached, or by unsubscribing from our newsletter.

As stated in our cookie policy, you can revoke your consent to the placing of non-functional cookies at any time by clicking the button at the top of our cookie policy.

Please note however that withdrawal of your consent does not prejudice the legitimacy of any processing operations that took place on the basis of your consent before you decided to withdraw it.

## **DISCLOSURE OF YOUR PERSONAL DATA**

### **1. Data you personally share with us**

If you wish to use our contact form, we will ask you to furnish us with a number of personal details, which is the point in time at which you provide us with personal data. By sending us an email, you share personal data with us (your email address and your surname, first name, address, telephone number, photograph, depending on what you include in your email). These data are used to enable us to meet our contractual obligations vis-à-vis you and to provide a service on your behalf, to answer your questions and for direct marketing purposes. These data are stored on secure servers owned by Vlitix or (one of) its processor(s) (e.g., a hosting company), which is/are also strictly bound by an obligation of confidentiality with regard to your personal data.

### **2. Data collected on the basis of your use of the website**

We collect data on the manner in which you use our services and website. This allows us to tailor our services to your needs and interests even better. Furthermore, we use cookies to collect data on the use of our services.

### **3. Data supplied by third parties**

In principle, Vlitix does not receive your personal data via third parties. Moreover, we do not collect or use information for purposes other than the purposes described in this privacy policy.

## **TRANSMISSION OF YOUR PERSONAL DATA TO THIRD PARTIES**

Vlitix does not transmit any personal data to third parties except if necessary to achieve the predetermined purposes. In that case, the customer's personal data are shared with other companies (of the Vlitix Group) situated within the European Economic Area which are directly or indirectly affiliated to Vlitix or any other partner of Vlitix.

Vlitix guarantees that the recipients in question take the appropriate technical and organisational measures to ensure that the personal data are protected.

## **HOW LONG ARE PERSONAL DATA RETAINED FOR?**

The GDPR does not impose a concrete period of time during which personal data must be stored. The general principle is that personal data cannot be retained for any longer than is necessary. That necessity will depend on the concrete situation.

Vlitix does not retain the personal data it processes for any longer than is necessary to achieve the purposes set out in this privacy policy and for which the personal data were collected.

The personal data you share with us in the context of our contractual relationship or when you ask us a question are retained for the time it takes to provide you with services or answer your questions, taking account of the contractual and/or legal obligations incumbent on us to retain the data in question. Every undertaking, including Vlitix, is for one legally obliged to retain certain documents for a specific period of time (e.g., in virtue of the tax legislation, the Public Records Act, personnel files, invoices, etc.).

## **WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA?**

### **1. Right of access, right to rectification and erasure**

Your personal data are and remain your personal data. You remain in full control. Accordingly, we practise optimum transparency, reasonableness, and legitimacy with respect to their use whereby you retain control of your personal data and of what happens to them.

You are entitled to request access to the personal data Vlitix processes about you.

If that information proves to be incorrect, you are entitled to have that information rectified.

In principle, you are also entitled to have any personal data relating to you erased. Personal data cannot be erased if the processing of your personal data is necessary for or designed to substantiate or organise our defence in the context of a legal action.

Your request for erasure may also be turned down if required in the public interest, to protect the rights and freedoms of others or if covered by the exceptions set out in law. These legal exceptions are listed under article 17 GDPR:

- The processing is necessary to exercise the right of freedom of expression and information;

- The processing is necessary to comply with a legal processing obligation incumbent on the controller under Union or Member State law, or to perform a public interest task or exercise the official authority the controller is vested with;
- The processing is necessary for reasons of public interest in the area of public health;
- The processing is necessary for scientific, historical research or statistical purposes and insofar the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- The processing is necessary to institute, pursue or substantiate a legal claim.

## 2. Restriction of processing and right to object

In certain cases you are entitled to have the processing of your personal data restricted. This may inter alia be the case if you were to dispute the accuracy of your personal data or if the processing is unlawful. In that case, your personal data will be stored only.

You are also entitled to object to the processing of the personal data in question on the basis of article 6.1 (f) GDPR, including to any profiling based on these provisions. Such an objection is not possible if the processing of your personal data is necessary to execute a contract.

## 3. Data portability

You are entitled to obtain a copy (in a structured, commonly used and machine-readable format) of your personal data and to have your personal data transmitted to another company.

## 4. Automated decision-making

You are entitled not to be subjected to decisions that are solely based on automated processing if they produce legal effects in your respect or if they will significantly affect you. This is not possible if that decision is based on your consent.

## **EXERCISING YOUR RIGHTS**

You can exercise these rights free of charge by emailing your request to [info@vlitix.com](mailto:info@vlitix.com) or by posting it to the address of our registered office, i.e., Berkenmei 65, 2350 Vosselaar.

This request must include proof of your identity and the relevant information so as to enable Vlitix to meet its obligations.

If you submit requests that are manifestly unfounded or excessive, Vlitix will be within its rights to charge you a reasonable fee or to turn down your request. In the latter case we will notify you to that effect in writing.

## **COMPLAINTS**

If you feel that our processing of your personal data may constitute an infringement of the provisions of the present privacy policy or the GDPR, you are entitled to lodge a complaint with the Data Protection Authority via [this link](#).

## **SECURITY**

Vlitix has developed the appropriate technical and organisational measures to prevent the destruction, loss, alteration, modification, the unauthorised access and the accidental disclosure of your personal data collected via our website or by any other means to third parties, including the unauthorised processing of your personal data.

In no case can Vlitix be held responsible for any direct or indirect damage arising out of the improper or illegitimate use of your personal data by a third party.

## **THE USE OF "COOKIES"**

This website, vlitix.com, uses cookies. Below, you will find an overview of how we use these cookies. Do bear in mind however that certain media will be unavailable to you if you do not accept the corresponding cookies.

### **1. What are cookies?**

When you visit the site, "cookies" can be saved to the hard disk of your computer. A cookie is a tiny text file containing bits of technical information (Internet settings) a website's server places in the browser of your computer or mobile device when you visit a website.

Cookies also include so-called "scripts". A script is a programming code that is used to optimise the interactivity of our website.

The term "cookies" also covers "web beacons", "pixel tags" and "social media cookies". These are used to integrate the various social networking sites into vlitix.com. This means that elements embedded and stored by a third party may also be displayed on our website.

In view of the fact that cookies are personal data, their processing is governed by our privacy policy. Functional cookies are processed in virtue of our legitimate interest given that functional cookies are required to ensure the proper functioning and security of vlitix.com. We do not install any other cookies unless you have given vlitix.com your consent to do so.

### **2. Types of cookies**

#### **A. Origin**

When you visit our website, various types of cookies may be used.

"First-party cookies" are cookies vlitix.com places on the website directly. "Third-party cookies" are cookies third parties place on vlitix.com, more specifically because vlitix.com incorporates elements from other websites into its own website.

#### **B. Duration**

"Permanent cookies" remain on your device for the cookie's lifetime. They are activated any time you visit vlitix.com.

"Session cookies" simplify and link up your actions while browsing. These cookies are temporary in nature and are installed any time you open your browser screen. Session cookies are deleted as soon as you close your browser.

### **C. Function/purpose**

“Functional cookies” are cookies that make sure the website functions as it should and that you get to enjoy a personalised experience (e.g., where applicable, your language setting, or in the case of the web shop, the functionality of the shopping cart).

“Non-functional cookies” are used for statistical, social, and commercial purposes and are independent of the technical support vlitix.com provides and do not meet the conditions to be exempted from the consent requirement. These cookies invariably require your express consent.

“Analytical cookies” allow us to analyse the website’s statistics. The use of Google Analytics, a web analysis service provided by Google Inc., means that these analytical cookies are placed on your computer to enable us to analyse how visitors use the website (which pages are the most popular, what problems visitors encounter on certain pages, etc.). The data collected in the context of Google Analytics are stored on servers owned by Google Inc., situated in the United States of America. By virtue of the fact that you use this website, you authorise Google to process the information in the aforesaid manner and for the aforesaid purposes.

“Performance cookies” allow us to measure how many visitors have visited a specific web page or list the most popular web pages. They also allow us to establish how you landed on our website. On the basis of that information, we are able to enhance our website and optimise your user experience.

### **D. Consent**

The information the cookies generate about your use of the website may be transferred to secure servers owned by Vlitix or a data processor who is also strictly bound by an obligation of confidentiality with regard to your personal data. We use this information to keep a record of how you use our website, to compile reports on website activity and to offer other services in relation to website activity and Internet usage. By continuing to browse our website, you agree to our use of cookies. While you can always refuse the use of cookies by selecting the relevant settings in your Internet browser, we must remind you that you may very well not be able to make full use of all our website’s functionalities.

### **E. Managing cookies by the user**

Vlitix uses cookies to remember the preferences of its website’s users. Cookies are also used to allow users to explore the website and to offer them certain functionalities. In addition, we use cookies to guarantee the secure use of our website, thereby optimising users’ visits to our website.

Web browsers allow you to manage cookies and to disable their use. Furthermore, it is also possible to delete cookies installed already.

Via your Internet browser you have the option to automatically, or manually, disable cookies and to specify whether certain cookies can be installed or not. In addition, you can configure your Internet browser in such a way that you receive a message any time a cookie is about to be installed. Further information about these options can be found in your browser’s instructions under the Help functionality.

The vlitix.com website uses CookieYes allowing visitors to check the currently essential, functional, analytical, performance and advertising cookies, including their type and duration, at any time via the “preferences” button in the cookie module.

Every 24 hours, CookieYes scans the entire website featuring this tool and then makes the necessary adjustments to ensure that visitors are always presented with the most accurate information. Vlitix is not responsible or liable for the accuracy, exhaustiveness, or relevance of the information CookieYes supplies.

## **AMENDMENTS**

This privacy policy is tailored to the use and the possibilities of this website. Amendments and/or changes to this website or any other means by which we collect and process data, may lead to amendments to this privacy policy.

Furthermore, Vlitix may be compelled to amend this privacy policy to bring it into line with new legislation and/or recommendations from the Data Protection Authority or recommendations from the European Data Protection Authority.

## **APPLICABLE LAW AND COMPETENT COURTS**

This privacy policy is exclusively governed by Belgian law. In the event of dispute about the validity, application, interpretation, or enforcement of this privacy policy, solely the courts of the judicial district where the company is situated shall have jurisdiction to take cognisance of any such disputes.

If you believe that the processing of the personal data relating to you infringes the General Data Protection Regulation you are entitled to lodge a complaint with the supervisory authority, more specifically in the Member State where you have your habitual residence, are employed or where the alleged infringement was committed.

## **QUESTIONS AND FEEDBACK**

We regularly check whether we remain compliant with the applicable privacy legislation and this privacy policy. If you have any questions or require further clarification in relation to this privacy policy, please feel free to contact us at: [info@vlitix.com](mailto:info@vlitix.com) – or by telephone on: +32/478 32 84 25.