

## **Privacy**

The objective of this text is to provide information about the way in which data received by Clarity-Holacracy, established at Camille Huysmanlaan 84, 2020 ANTWERPEN, Antwerp, Belgium, hereinafter referred to as Clarity, are used and processed.

We shall list the procedures we have established to protect your privacy, the way in which you can intervene at any time and what controls are established to ensure the strict respect of this text.

This text governs the collection, management and use of your data by the bodies belonging to Clarity-Holacracy. Hereby, we are in compliance with the GRPD.

Respect for your privacy is a priority for Clarity. We are aware and attentive to your right to be informed about how data and information that could identify you personally (hereinafter, "your Data"), which you may provide to Clarity, are processed. This text on "Privacy" explains to you how we use your data as well as the steps we take to preserve confidentiality and security.

### **1. What "Data" do we collect?**

We collect your contact details such as your surname, first name, postal address, e-mail address, mobile telephone number, B.C.E. number, banking details, profile on social networks etc. We also save data obtained by the intermediary of third parties or via contracts, contact forms, payment data, orders etc. Any other data that you communicate to us are also collected. We can also collect data concerning you when you use our websites or social networks, when you reply by e-mail, via cookies, browsing data and other technology. In addition to the above-mentioned data, we also collect company data such as the VAT number or company number, contact details for contact people at the legal person (surname, function, telephone number etc.) and the data of the associates and/or partners of the company. Generally speaking, these data are requested in some way and you are perfectly aware that you are transmitting them to us. We also collect data via external channels including address managers. We then contact these potential B2B customers. Subsequently, they can verify, correct or modify their data, or prohibit any further use thereof.

### **2. Why do we collect these data?**

Mainly, your data is used either to send you information, news or a publication that might interest you, or to be able to process properly the contract that unites us, but also to manage better the tasks that have been entrusted. We may also use your data to invite you to conferences, seminars, festivities or workshops, to inform you about our promotions, our

news, or news you may be interested in, for direct marketing or to create profiles. Creating profiles enables us to communicate to you information that is much more focussed and useful.

If you do not want to receive our newsletters or information about our services you can unsubscribe at any time without having to justify your decision. All you need to do is to send us an e-mail or contact our establishment or contact directly by e-mail or telephone [francois.flamion@clarityupgrades.be](mailto:francois.flamion@clarityupgrades.be), 0470 076498.

You will receive only the electronic direct marketing communications if you have given your explicit permission. You can also unsubscribe from direct marketing communications, at any time and without charge. We also use your data for statistical purposes and in order to improve our products and services. If we find that one of our websites or a specific page records a drop in the number of its visitors, we can check the cause. Subsequently, we can modify and improve this website so that our customers have easier access to the information they seek.

### **3. Data base management**

All personal data are managed by Clarity. These data may be transmitted only to its subcontractors, provided that this is useful for achieving their tasks. Within Clarity, only officers who should have access to this data as part of their tasks can access them. In order to collect data from our customers, we have chosen to keep a register in compliance with the model produced by the Privacy Commission (*Commission de la Vie Privée*).

### **4. Shelf life of your data**

Clarity keeps your data only for the time that is estimated reasonable and necessary in relation to the aims pursued, as listed above.

### **5. Transmission to third parties**

At no time do we sell or rent your data to businesses or individuals that are not part of Clarity. Our company, as well as its partners and subcontractors, treat your data as confidential information. We occasionally use an external intermediary. This implies in particular that, for some tasks, your data are temporarily transmitted to third parties if we do not have the means to carry out these tasks ourselves. If we do this, we always make sure that your data are processed confidentially and used in a secure manner. In all cases, we contractually commit ourselves to this with these intermediaries.

### **6. The right of access, rectification and opposition of your data**

When you become a Clarity customer, we record certain data. You then have rights in connection with this collection: a right of access, correction and deletion of your data. This is also the case for all persons identified as recipients of information, communication relayers, and all those included in contacts related to social networks or others. To do this, you must simply address a clear request to François Flamion, in which you mention precisely what you want to see, correct or delete.

On the basis of your request, Clarity reserves the right to require that your approach be signed, dated and accompanied by a copy of the front of your identity card. If you want us to delete your data you should also specifically motivate your request. If these conditions are respected, Clarity will honour your request as soon as possible and inform you of the same, unless your request for deletion be contrary to legal requirements (example: your contact details relating to accounting).

## **7. Modification of the “Privacy” text**

Clarity hereby reserves the right to modify this Charter for the purposes of compliance with legal modifications, adaptations and developments concerning the protection of personal data. It is your responsibility regularly to consult the text, in which such adaptations will be dated at the end of the text.