GENERAL DATA PROTECTION



Privacy Policy

Version: v2.0 Date: 28/07/2019

PRIVACY POLICY WHITE RESEARCH

1. INTRODUCTION

The protection of your personal data is very important to us. WHITE RESEARCH acknowledges that you are concerned about how your information is shared and processed, therefore we take several appropriate measures to safeguard your personal data under our control. This Privacy Policy defines the steps we take to ensure that the information provided to us will remain secure and confidential and will be used only for the purposes for which it is provided.

With this Privacy Policy we would like to keep you updated regarding:

- How and why we collect and process your information,
- How this information helps us to meet your professional needs and requirements,
- With whom and why we share your information,
- Your choices regarding how we use your information,
- The measures we apply to keep your information safe,
- How you can contact us regarding privacy issues.

2. GENERAL INFORMATION

Processing of personal data

Personal data according to Article 4 of the General Data Protection Regulation of the EU (GDPR) are all information relating to an identified or identifiable natural person, e.g. name, address, e-mail address, etc.

Controller's identity and contact details:

WHITE RESEARCH

Avenue de la Toison d'Or 67, 1060, Brussels, Belgium

Tel: 0032 28518046

Email: info@white-research.eu

NOTIFICATIONS TO PUBLIC AUTHORITIES

In order to comply with relevant legal requirements, we reserve the right to disclose information about you if we are requested to provide information to the competent authorities or law enforcement agencies.

3. TYPES OF INFORMATION WE COLLECT

We collect as little information as possible to be able to maintain a satisfying level of collaboration with you. Usually, this information includes:

- Contact details (name, email, address, home address, mobile and land line numbers).
- Tax and id information (name, VAT number, profession)
- Financial details such as bank accounts.
- Various types of personal data depending on the specific requirements of the projects that we undertake.

4. HOW WE USE YOUR INFORMATION

We would like to keep you always updated regarding collecting and using your personal data that come into our possession when you cooperate with us. We only ask for the minimum information required to serve our business relationship and to effectively communicate with you. In general, we process information to:

- issue and archive the legal tax documents relating to your transactions with us;
- make and receive payments;
- communicate and cooperate with you for the purposes of our business relationship;
- send you bids;
- receive your feedback on problems you may encounter when collaborating with us;
- send you newsletters, messages and other promotional material about new activities and services that may interest you.

Our Company ensures that your data will not be used for purposes other than those mentioned in this policy without your prior notification and consent if required.

5. CONSENT WITHDRAWL

You may, at any time, withdraw your consent to receive promotional messages from us either by calling us (0032 28518046), by sending us an email (info@white-research.eu) or by clicking on the relevant link situated at the bottom of each promotional message you receive.

6. TRANSFER OF YOUR INFORMATION

We never disclose your information to third parties, except when:

- it is necessary to provide you with a service that you have requested (e.g. to send paper files with a courier service);
- it is required by a critical internal process (e.g. IT support, accounting services, etc.);
- it is required by Law (e.g. Tax Authorities).

When your information is transferred to third parties, we ensure that we minimize this information to the extent necessary to achieve the specific purpose.

Unless otherwise prohibited by any legal process, third parties are obliged and bound to protect your personal data in accordance with our policy and comply with applicable laws and regulations on privacy.

7. RETENTION AND ERASURE

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required by law. The criteria used to determine our retention period include:

- The length of time we have an ongoing relationship with you.
- Whether there is a legal obligation to which we are subject (for example, tax laws require us to keep records of your transactions for a certain period).
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

After the end of retention period, your personal data are destroyed, deleted or anonymized.

8. YOUR RIGHTS

You must know that according to General Data Protection Regulation, you have certain rights regarding your personal data under our possession.

Specifically, you can ask us to:

- give you a copy of your data,
- correct your data, if you think they are not accurate,
- erase your data, if there are specific reasons to do so,
- limit the processing applied to your data,
- give you your data in an appropriate format and to transfer them to another Company,
- stop processing your data, under certain conditions.

To ask us to do anything of the above, you can contact us by phone (0032 28518046) and by email: info@white-research.eu. We will promptly examine your request against the relevant requirements of the GDPR and we will answer the latest within 30 days after receiving your request. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within thirty days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline. It is possible to ask from you for identification (e.g. photocopy of your identity card or passport) to avoid non-authorized reveal of your personal data.

To ensure that your personal data are always accurate and updated, we recommend you keep us informed about your data, as needed (e.g. in case of a change in a street or email address).

If you feel that your rights regarding your personal data are being compromised, you have the right to submit a complaint to the relevant Data Protection Authority: http://https://www.dataprotectionauthority.be, Rue de la Presse 35, 1000 Brussels, tel. +32 (0)2 274 48 00, email: contact(at)apd-gba.be. In this case, we would especially appreciate your prior communication with us, either by sending a letter to our headquarters:

WHITE RESEARCH - Avenue de la Toison d'Or 67, 1060, Brussels, Belgium

or by sending an email to <u>info@white-research.eu</u>, always giving your full details and your reason for contacting us. We assure you that we appreciate your trust and we take prompt care to respond to any requests, questions or complaints.

9. SECURITY

We apply security technologies, policies and others measures to protect personal data under our control from unauthorized access, inappropriate use, alteration, illegal or accidental destruction or loss. We also require from all our employees and any third party that have access to or are authorized to process your data, to be bound by a contract to protect your data.

10. COOKIES

Our site uses cookies, in accordance to common internet practices, to help you access and browse the web. Cookies are small alphanumeric characters files that are transferred from our site to your PC or smartphone/ tablet. Cookies assign your computer with a unique ID, which in turn becomes your own identity each time you return to our site. Cookies do not damage your electronic equipment, nor can they read information from other files on your computer's hard drive.

Cookies are unique to each web browser (e.g. Google Chrome, Mozilla Firefox, Internet Explorer, etc.) and contain anonymous information regarding the sites that the user visits. Below you can find information about the cookies that may be used on our website:

FUNCTIONALITY COOKIES

Functionality cookies are used for the smooth operation of our web site. They enable our site to "remember" user preferences in order to offer improved and customized functionality to each user. This category includes cookies that store information, such as a username or a content basket, as well as safer browsing information, however any sensitive information is stored in encrypted form.

PERFORMANCE COOKIES

These cookies collect information about how our site is been used. As a result, our site can adapt to your needs for improved browsing experience. These cookies are also used to create reports for improving the site.

WHITE RESEARCH / GENERAL DATA PROTECTION - PRIVACY POLICY / VERSION: v2.0

TARGETING & ADVERTISING COOKIES

These cookies are used to provide content that best suits you and your interests. They can be used for targeted advertising, limiting ad delivery, or measuring the effectiveness of an ad campaign. These cookies allow you to see ads that target your interests and preferences. These ads may appear when

you browse other sites.

COOKIES DEACTIVATION

None of the cookies on the site is necessary for its operation, you can disable cookies from your browser settings or disagree with their use on our site. For more information about disabling cookies,

please visit your browser's official website.

11. DISCLAIMER OF LIABILITY FOR THIRD PARTY WEBSITES

Although our site may contain links to third-party sites, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site's

responsible personnel.

12. CONTACT

We want you to contact us for issues related to your privacy, such as for example:

Updating your information,

Changing the communication method,

Asking questions or commenting on the privacy practices we apply and about this Privacy

Policy.

You can contact us about the above and other related topics in any of the following ways:

• by mail: Avenue de la Toison d'Or 67, 1060, Brussels, Belgium

• by e-mail: info@white-research.eu;

by phone: +32 2 851 80 46

13. REVISIONS OF THIS PRIVACY POLICY

It is possible to revise this Privacy Policy periodically in order to adapt to the changing legal, regulatory, business and technology environment. In our site you can find the current Privacy Policy with date of

entry into force to know when the most recent review was made