



EALD PARTNER - PRIVACY NOTICE

EALD PARTNER SCSPRL (Rue d'Arlon 69/71, 1040 Brussels, and company registration number 0476.705.411), hereinafter also "EALD PARTNER" or "We", "us", "our"), respects your privacy. To better protect your privacy we provide this Statement explaining our online information practices and the choices you can make about the way your information is collected and used by Eald Partner. To make this Notice easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested.

We strongly urge you to read this Notice and make sure you fully understand and agree with it, before you access or use any of our services. If you do not read, fully understand and agree to this Privacy Notice, you must immediately leave this website, application or service, and avoid or discontinue all use of any of our services.

Capitalized terms which are not defined herein shall have the meaning ascribed to them in our Terms of Business.

1. General terms

This privacy notice (the "Notice") describes why and how we collect and use the Personal Data of our clients and potential clients, service providers and individuals that receive our newsletter ("You"). It also provides information about the rights of individuals.

We are a data controller. This means that We are responsible for deciding how We process Personal Data about You. We are required under EU Privacy Laws to notify You of the information contained in this Notice. Depending on who You are, We collect different Personal Data from You, for specified purposes and based on a specific legal ground and section 2, 3 and 4 will apply to our Processing of your Personal Data.

This Notice applies to Personal Data We obtain:

- (a) From individuals who are our clients;
- (b) From or about individuals when We provide our services to our clients; and
- (c) From individuals that contact us to ask for a quote or request advice on our online contact form.

Our policy is to collect only the personal data necessary for agreed purposes and we only ask to share personal data where it is strictly needed for those purposes.

2. Clients or potential clients

2.1. What information do we collect and how do we collect it?



If You are one of our clients or potential clients, We will collect the Personal Data We need in order to provide You our services. These may vary depending on which type of services We provide to You (accounting services, company law services, taxation services, general advice/assistance services).

The Personal Data We collect from You can include: name; email address; telephone number; address; the organisation You belong; your job title; the VAT Number; a copy of your ID card; your bank account numbers. We collect the above Personal Data when You become one of our clients and You sign our terms of business, during meetings We have with You, by phone or by email in the course of our business, or when You contact us through our online contact form.

We typically collect Personal Data directly from You or from the organization You belong (e.g., if You are an employee of our clients), in such a case under the assumption that specific measures have been put in place by such organizations to lawfully provide us with the your Personal Data.

2.2. Why do we collect such information?

We use your Personal Data for the following purposes:

(a) Providing our professional services: We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables and to contact You about your accounting status

(b) Customer management: In order to provide optimal customer experience, we process personal data such as [identification data, electronic identification data,, [...]] for the purpose of customer management and to allow You to access our online client area. We carry out this processing on the basis of our legitimate interest in knowing our customer and maintaining our relationship with you, with a view to providing a stellar customer experience.

(c) Product development and improvement: Naturally we strive to always improve our services in order to make them fit our customers' needs. For this reason, and based on our legitimate interest in doing so, we process personal data such as Company name, email address, website URL, Name of the Person Representing your Company and draw insights in relation to possible improvements and to update You about relevant information and send You our newsletter

(d) Compliance: to maintain appropriate business records, in the course of mandatory filings with authorities and public agencies in relation or connection to the services we provide our clients to, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

We do so because it is necessary to perform the contract We have with You or, in case of (d), to comply with a legal obligation.



2.3. How long do we keep this information?

We keep your Personal Data for 10 years, in accordance with EU Anti-Money Laundering laws, after the end of our relationship.

If You are a potential client using our online contact form to request advice or a quote, We undertake, absent of any Processing activities within a period of 6 months, to delete the Personal Data We hold on You.

We may retain electronic copies of files containing Personal Data created pursuant to automatic archiving or back-up procedures which cannot reasonably be deleted. In these cases, We shall ensure that the Personal Data are not further actively processed.

3. Individuals subscribing to our newsletter

When You subscribe to our newsletter, You provide us with your email address. We collect this Personal Data when You fill in our newsletter subscription page or You send us an email to express your interest.

The newsletter allows us to inform You about indispensable accounting calendar dates and tax and accounting news.

We do so based on your consent and We store your Personal Data as long as You don't withdraw it.

However, We may retain your Personal Data for a longer period in order to comply with EU or national laws.

We may retain electronic copies of files containing Personal Data created pursuant to automatic archiving or back-up procedures which cannot reasonably be deleted. In these cases, We shall ensure that the Personal Data are not further actively processed.

4. Our Service providers

If You are one of our service providers, We collect your name; email address; telephone number; address; VAT number; ID card; organisation You belong and job title.

We do so in order to prepare, execute and terminate a contract We have with You.

We Process your Personal data based either because those are necessary in the performance of a contract or because We have the legitimate interest to administer our business. In doing so, We considered your rights and expectations as a Data Subject and have assessed that your interest, fundamental rights and freedoms are not put at risks. We retain your Personal Data for 1 year.

However, We may retain your Personal Data for a longer period in order to comply with EU or national laws. We may retain electronic copies of files containing Personal Data created pursuant to automatic archiving or back-up procedures which cannot reasonably be deleted. In these cases, We shall ensure that the Personal Data are not further actively processed.

5. Change of purpose



We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose.

If We need to use your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so.

6. Which third-parties process your Personal Data and where are they transferred?

Eald Partner may share your Personal data with third parties (or otherwise allow them access to it) only in the following manners and instances:

6.1. Third Party Services

In order to provide our services to You, We work with other companies and services providers. These include:

(a) Fiduciaire Montgomery, our partner accountancy firm;

(b) LogicalTIC, Logidrive, NoProbz and Winbooks, our IT services and software providers, managing our databases, IT systems, programs, and on-site IT systems;

(c) FiduPress, our newsletter provider, managing the email subscriptions to the newsletter;

(d) MailChimp, a third party providing email marketing services allowing us to communicate with You through the newsletter and EALD Partner announcements. MailChimp is located in the United States. Your Personal Data are transferred to, stored and processed in the United States and may be shared there. We have taken steps with MailChimp to ensure that the transfer of your Personal Data to MailChimp complies with EU Privacy Law. MailChimp participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. We have also signed a Data Processing Agreement incorporating Standard Contractual Clauses with MailChimp. If You would like to receive a copy of the agreement, You can contact us at privacy@ealdpartner.be. We do not use other third-parties to process your Personal Data or otherwise transfer Personal Data outside of the EEA and/or disclose your Personal Data to other recipients than those identified in this Notice. If We were to do so, We will comply with EU Privacy Law.

7.2. Law Enforcement, Legal Requests and Duties

Where permitted by local data protection laws, Eald Partner may disclose or otherwise allow others access to your Personal data pursuant to a legal request, such as a subpoena, legal proceedings, search warrant or court order, or in compliance with applicable laws, if we have a good faith belief that the law requires us to do so, with or without notice to you.

If warranted, we may also allow access to this information in special emergencies where physical safety is at risk. We reserve the right to disclose any personal data or other information obtained from or about you, to third parties in connection with a



merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

7. Data security

Your Personal Data are treated as confidential. In order to safeguard your Personal Data from unauthorized access, collection use, disclosure copying, modification, disposal or similar risks, We have put in place appropriate administrative, physical and technical measures, with all of our work be done through a fully encrypted server. We update and test our security technology on an ongoing basis.

We restrict access to your Personal Data to those employees and staff who need to know that information to provide benefits or services to You.

In addition, We train our staff about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our staff' privacy responsibilities.

8. Your rights in connection with Personal Data

Under certain circumstances, under EU Privacy Law, You have the right to:

(a) Request access to your Personal Data. This enables to receive a copy of the Personal Data We hold about You and to check that We are lawfully Processing it.

(b) Request correction of the Personal Data that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.

(c) Request erasure of your Personal Data. This enables You to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where You have exercised your right to object to Processing (see below).

(d) Request the restriction of Processing of your Personal Data. This enables You to ask us to suspend the Processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for Processing it.

(e) Request the transfer of your Personal Data to another party (right to data portability).

To exercise your rights as Data Subject, make queries or complaints, please contact privacy@ealdpartner.be.

When You provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, You have the right to withdraw your consent for that specific Processing at any time.

When We process your Personal Data based on our legitimate interest (or those of a third party), You have the right to object to such Processing.

To withdraw your consent or object to the Processing, please e-mail us at privacy@ealdpartner.be.



If You are dissatisfied with any aspect of our handling of your Personal Data, You have the right to make a complaint at any time to the relevant Supervisory Authority.

9. Use of Cookies and Other Tracking Technologies

We process information about visits to our website, the web pages visited, the date and time of access, domain name of the user and of the searches performed. Such information includes Personal Data. We use this information for internal purposes to compile aggregate statistical data about users' browsing actions and patterns and to estimate our audience size and usage patterns. We obtain information by installing "cookies".

Please note that Third Party Services placing cookies or utilizing other tracking technologies through our Services may have their own policies regarding how they collect and store information. Such practices are not covered by our Privacy Statement and we do not have any control over them.

9.1. Cookies

- 9.1.1. *Our website uses cookies, pixel tags and other forms of identification and local storage (together referred to as "tags/files" hereunder) to distinguish you from other users of the website and of websites of our network. This helps us provide you with a good experience when you browse the website and websites of our network and also allows us to improve our website and our services.*
- 9.1.2. *In many cases, these tags/files lead to the use of your device's processing or storage capabilities. Some of these tags/files are set by Eald Partner itself, others by third parties; some only last as long as your browser session, while others can stay active on your device for a longer period of time.*
- 9.1.3. *These tags/files can fall into several categories: (i) those that are necessary for functionality or services that you request or for the transmission of communications (functionality tags/files); (ii) those that we use to carry out website performance and audience metrics (analytics tags/files) and (iii) the rest (tracking across a network of other websites, advertising, etc.) (other tags/files).*
- 9.1.4. *Internet browsers allow you to change your cookie settings, for instance to block certain kinds of cookies or files. You can therefore block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, you may not be able to access all or parts of the website, due to the fact that some may be functionality cookies. For further information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org>*



9.1.5. *Functionality and analytical tags/files do not require your consent. For analytical and other tags/files, however, we request your consent before placing them on your device. You can give your consent by allowing cookies in your browser settings, by continuing to use our website, or by clicking on the appropriate button on the banner displayed to you.*

9.2. *We use the following cookies on our website:*

9.2.1. *Eald Partner's own cookies:*

- *Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.*
- *Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.*

9.2.2. *Google Analytics: a tool that allows us to assess how you and other web users use this website, and this information is essential in helping us to continuously improve our website's functionality. They can be preserved from 30 minutes to 2 years.*

9.2.3. *Other Targeting cookies. These cookies are set by our third-party advertising partners. These may be used to create a profile of your interests and therefore present you with relevant ads on other sites that you visit. These uniquely identify your browser and device; should you choose not to allow these cookies, our targeted advertising will no longer apply to you.*

10. Changes to Notice

We may revise this Notice from time to time and any revisions will be made available to You via our website.

11. Our contact details



EALD Partner Rue d'Arlon 69/71, 1040 Brussels info@ealdpartner.be +32 2 899 04 01

12. Glossary In this Notice:

"Data Processing Agreement" means the agreement that sets out BSEF and MailChimp's responsibility in line with Article 28 GDPR (or any other similar agreement to be entered in due course by us in accordance with EU Privacy Law). "Data Subject" means an identified or identifiable individual.

"Privacy Laws" means the General Data Protection Regulation 2016/679 ("GDPR") and the Belgian national privacy laws, as amended from time to time.

"EU-US Privacy Shield Framework" means the framework designed by the EU Commission and the US Department of Commerce allowing organisations located in the EU to transfer personal data to US companies certified under the framework.

"Personal Data" means any information relating to an identified or identifiable natural person. "Processing" means any operation performed on Personal Data, manually or by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Supervisory Authority" means the Belgian Data Protection Authority or the relevant data protection authority of the Data Subjects' habitual residence or place of work