

## **PRIVACY POLICY**

### **1. Introduction**

This version of this Privacy Policy is effective as of 25 May 2018. On this date, the General Data Protection Regulation (“GDPR”), which protects natural persons in connection with the processing of personal data and concerning the free movement of such data, has come into effect. GDPR also replaces the Belgian Act of 8 December 1992.

On the one hand, GDPR defines a number of rights for natural persons whose personal data is processed, but on the other hand it also imposes specific obligations on organisations and companies that process such personal data.

This Privacy Policy describes how and when we collect, use and share your personal data and information when you use our website, available on Fanfinity.biz and any subsite or application operated by or on behalf of us (referred to respectively as the “Service(s)” or “Website(s)”).

The terms of this Privacy Policy form part of our Terms and Conditions available on our website.

### **2. General**

By visiting our Website or using our services, filling in and sending a contact form and/or contacting one of our employees, in any way whatsoever, you acknowledge and agree that your personal data will be processed as described in this Privacy Policy.

Nevertheless, you may object at any time to certain processing operations in certain circumstances; see §9 below. Please do not hesitate to contact us if you have any further questions and/or comments regarding this Privacy Policy; see §11 below.

### **3. Nature of the personal data we process**

As part of our services, we have limited the processing of personal data to a strict minimum. The personal data processed by us relates in particular to:

- your surname and first name;
- your e-mail address, to the extent that it contains personal data;

We may also process data relating to your personal interests as provided by you during the registration process or otherwise.

We also collect and process data collected through your use of our Website (browsing). This data may include the date and time of your visit (time stamp), the type of browser you use, your IP address and the pages visited.

In this context, we may also collect data of a non-personal nature, such as browser type or IP address, the operating system you use or the domain name of the website through which you visited our Website. We only use this data to gain further insight into the use our users make of the respective website(s), in order to improve the functionalities and user experience. For this purpose, please see in particular the provisions on the placement and use of cookies in §10 below.

### **4. Objectives of the processing of personal data**

The processing of this personal data by us has several objectives:

- if you expressly authorise us to do so: to send you newsletters or other messages containing commercial offers (by e-mail or at your physical address);
- when you enter into an agreement with us: to identify you in accordance with the applicable legal provisions (surname, first name, physical address, email, etc.);
- in any given circumstance, to authenticate you as a customer/user of our Website;
- if you also provide us with your e-mail address, we will use this personal data to send you information that is necessary in the first instance pursuant to carrying out our agreement(s) with you: the sending of notifications, confirmations, possibly invoices and reminders, etc.

Certain data that may qualify as personal data, such as account number, invoice number, etc., may be generated by us. This data is only processed by us pursuant to carrying out the agreement(s) you have concluded with us.

However, this transfer and provision is limited to strictly necessary processing in the context of our services, including administrative management, provision of information to and by the customer services department, etc.

## **5. Transfer of your personal data to third parties**

In the context of certain of our services, we make use of one or more external service providers, in particular for the hosting and management of our website and any specific functionalities associated with it (e.g. sending newsletters, announcements, making reservations, etc.). The processing of personal data by these third parties is limited to purely technical support.

Apart from such processors, your personal data will only be used by our internal employees who are authorised to do so.

However, we may disclose your personal data to third parties in response to a request for information if we believe that the disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by applicable laws, rules, regulations or contractual provisions, or if we believe that your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of us or others.

In the event that the provision of the service in question so requires, or in support of any technical, administrative and/or financial processing, your personal data may be transferred and processed to one or more third parties. We have concluded a separate agreement with these companies, in which the processing of personal data is expressly regulated and the possible exercise of rights of subjects' data is included.

In accordance with the relevant legal provisions, your personal data may also be transferred to government authorities.

## **6. No transfer of personal data to third parties for promotional purposes**

Unless we have obtained your explicit and prior consent, we will not pass on your personal data to third parties for promotional purposes or commercial use by the latter.

## **7. Technical security measures**

We have appropriate technical and operational measures in place to ensure that your personal data is protected against unauthorised access, deletion or alteration.

We take reasonable steps to help protect information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. However, as stated in our Terms and Conditions, you expressly acknowledge and accept that – in general – the transmission of information via the Internet is never completely secure, private or confidential. Therefore, any information sent or received from the Website or by using any of the services provided by us may be intercepted, decrypted, accessed and/or used by third parties, even if technology is used which encrypts such exchange of information.

In any event, we will continue to make every effort necessary to ensure that your personal data is protected in accordance with applicable laws and best practices.

#### **8. Code of conduct for employees**

Some of our employees have access to your personal data mentioned above, in which context they are bound by a strict code of conduct. This code of conduct includes, amongst other things:

- an undertaking to respect the confidentiality of personal data to which they have access in the course of their duties;
- the commitment to process personal data only in the performance of their duties;
- compliance with the relevant legal provisions.

#### **9. Right to rectification, object, deletion and restriction of processing**

For various services we offer, we give you the opportunity to exercise your right to rectification, object, deletion and/or restriction of processing of personal data.

##### **Right to rectification**

If you are a customer or a registered user of the services provided by us, you may amend, update or rectify any personal information you have provided to us in connection with your account and user profile, if and when applicable. To do so, please send us a written request, as provided below.

##### **Automatic Data Deletion**

Unless otherwise agreed, all personal information collected by us via the Website or the services provided will automatically be deleted after a period of ten years following the termination of the agreement between you and us. Consequently, your data will only be stored for the legally prescribed period.

##### **Exercise of rights**

The exercise of these rights can take place as follows:

1. in writing: by sending a registered letter to Fanfinity BV, Tulpenstraat 11, 9810 Eke-Nazareth, Belgium setting out which rights you wish to exercise, along with a copy of your identity card (front and back);
2. electronically: by sending a registered letter to [info@fanfinity.agency](mailto:info@fanfinity.agency), setting out which rights you wish to exercise, along with a scan of your identity card (front and back).

Please keep in mind that exercising one or more of the above rights:

- for a given service, does not necessarily have an impact on your data provided in the context of another service provided by us (e.g. if you have different logins or account numbers). If you also wish to make this change or amendment for one or more other of our services, you will have to repeat this request one or more times;
- can in certain circumstances be totally or partially denied or limited, which refusal will be explained in our answer, to the relevant circumstance with reference to Frequently Asked Questions. By way of example, these reasons may include: the fact that we must retain certain data for a legally defined retention period, if the processing of personal data is essential for the execution of the contract, etc.);
- may in certain circumstances result in the suspension or termination, in whole or in part, of the contractual relationship with regard to the provision of such service.

## **10. Cookies**

We may use information about you to personalise and improve our services and to provide content or features that match user profiles or interests and to monitor and analyse trends, usage and activities related to our services. In doing so, we use a variety of technologies to collect information, including sending cookies to your computer or device.

Cookies are small text files stored in the memory of the device that allow us to improve our services and your user experience, see which pages are popular and record the number of visits to our Website.

We use both functional and analytical cookies.

Functional cookies are essential for the use of our websites, store, amongst other things, user preferences and are not shared with third parties. Analytical cookies help us improve our website by providing us with information about how users interact with our websites, such as the number of visitors to the website, the pages they visit and the time they have spent on the website. These cookies do not collect information that identifies a visitor.

All information collected by these cookies is aggregated and therefore anonymous.

Most Internet browsers allow you to delete cookies from your hard drive, reject cookies or receive a warning before a cookie is installed. Please refer to the instructions or help function of your Internet browser for more details, or visit [www.allaboutcookies.com](http://www.allaboutcookies.com).

Please note that if you choose to block, delete or reject cookies, this may adversely affect the availability and functionality of the Website and the services we provide.

## **11. Questions and complaints; exercise of rights by the person concerned**

If you have any questions about how we process your personal data, if you wish to review, rectify, update or delete your personal data, or if you wish to make a complaint, please contact us at the following email address: [info@fanfinity.agency](mailto:info@fanfinity.agency).

With regard to the exercise of your rights: in order to prevent us from making your personal data available, modifying it, restricting its processing or deleting it as a result of a third party request (and therefore not yourself), we ask you to send us a copy of your identity card (front and back) together

with the request – which must be in writing, dated and signed – at the following e-mail address [info@fanfinity.agency](mailto:info@fanfinity.agency) or by letter sent to the address listed above.

In this situation, you can submit a complaint to the Belgian Data Protection Authority, rue de la Presse 35, 1000 Brussels.

## **12. Amendments to this Privacy Policy**

We reserve the right to revise this Privacy Policy from time to time.

In addition to the fact that such amendments are notified on our Website(s), we may, in certain circumstances, send you an additional notification, and/or display a separate notice on the Website or within the user area. In any event, we encourage you to review the most current version of this Privacy Policy when you visit our Website so that you are aware of our processing operations and the ways in which your privacy and personal data is protected.