

PRIVACY POLICY

Lefebvre Sarrut Belgium takes the protection of your personal data seriously. In this document we explain how we process your data and protect your rights. We want to be clear about the data we collect and process and why we do this. We protect your data as best as we can, including by not selling it to third parties. We collect and process your data primarily in order to provide you with the products or services you have ordered and to keep you informed of similar products or services.

This Privacy Statement (the "Statement") explains what personal data we collect, directly or indirectly, and how we use and process it. Personal data are any data that may be used to identify you or that we may associate with you. This Privacy Statement also outlines the choices you can make about the data we collect and how you can manage those decisions.

This Declaration applies to all products offered by Lefebvre Sarrut Belgium ("Lefebvre Sarrut Belgium product(s)"). It also applies to all websites managed by Lefebvre Sarrut Belgium and to offline contacts, for example when you place an order by letter or fax or attend a Lefebvre Sarrut Belgium training course (collectively referred to as "Services"). Please read this Declaration carefully so that you know how Lefebvre Sarrut Belgium can collect, use and share the personal data you have provided. The words "we", "we", "us", "our" and "Lefebvre Sarrut Belgium" all refer to Lefebvre Sarrut Belgium nv.

The role and capacity you have in data processing

Personal data are all data that allow a link to be established with a natural person or to identify that natural person. This description clarifies which data Lefebvre Sarrut Belgium processes. The concrete circumstances of this processing depend on the role and capacity you have as a data subject, i.e. natural person of and about whom personal data are processed: customer, subscriber, user, prospect, supplier, etc.

This means that the data to be processed, the processing purposes, the basis for processing, the retention periods, etc. will vary according to your role or capacity. This Declaration is intended to reflect all circumstances in which Lefebvre Sarrut Belgium processes personal data. In order to take sufficient account of your role and capacity as a data subject, we make a distinction according to that role or capacity. Clearly, you can combine several of these roles or capacities. You can be a customer and at the same time be a user of a Lefebvre Sarrut Belgium product, take part in a training course and deliver texts as an author. In that case, in order to know what Lefebvre Sarrut Belgium does with your data, you should consult the different sections.

A. YOUR CAPACITY

You are a customer (including subscriber)

You are a user of a digital Lefebvre Sarrut Belgium product

You are a trainee/participant in a training course

You are a visitor to an event or contact us

You are a visitor to one of the websites of Lefebvre Sarrut Belgium (surf on our website)



You are an author or provide training

You are the contact person or representative of a professional client

You are a prospect

You are a supplier or contact person of a legal entity that is a supplier (including teacher/trainer)

You are a person of interest to Lefebvre Sarrut Belgium

Data of children

Clearly, you can combine several of these roles or capacities. You can be a customer and at the same time a user of a Lefebvre Sarrut Belgium product, take part in a training course and deliver texts as an author. In that case, in order to know what Lefebvre Sarrut Belgium does with your data, you should consult the different sections.

- B. HOW WE PROCESS AND USE PERSONAL DATA
- C. HOW WE SHARE PERSONAL DATA
- D. THE PRINCIPLES GOVERNING THE USE OF PERSONAL DATA
- E. SECURITY AND STORAGE OF YOUR PERSONAL DATA
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- G. YOUR RIGHTS
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- I. CONTACT US
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A. YOUR CAPACITY

You are a customer (including subscriber)

You are a customer of Lefebvre Sarrut Belgium when you order and purchase a product from Lefebvre Sarrut Belgium. This can be the purchase of a book or a subscription to a journal. To this extent, each subscriber is also automatically a customer. In this context, participation in events and/or training courses is dealt with under a separate heading, as is the use of a digital product.

When does Lefebvre Sarrut Belgium process data about you?

If you buy a Lefebvre Sarrut Belgium product, you can do so directly, in our offices or on stands at events, via one of the websites of Lefebvre Sarrut Belgium, via an individual website of one of the journals we offer or via the individual website of one of the digital products we offer.

What data does Lefebvre Sarrut Belgium process about you?

When you buy a product from us, regardless of the channel, we ask you to provide us with a number of details. This includes information such as name and address, telephone number, e-mail address, delivery and shipping address, billing address, payment details, position or profession, VAT number and the areas of expertise covered by the products you have ordered and purchased.

For what purposes do we process these data?

We process this data in order to process your transaction (purchase), to follow up the delivery of the product, to provide assistance with any delivery problems, including returns, and other problems related to the purchase of your Lefebvre Sarrut Belgium product. We summarize these purposes under the heading "customer management". We do not store payment details, including credit card details. We only use them in connection with the purchase of your Lefebvre Sarrut Belgium product.

What is the basis for processing?

This processing is necessary in order to be able to execute the agreement you enter into with us as a result of your purchase. For some data, the processing is based on our legitimate interest in doing business, which includes direct marketing. This is particularly the case for the codes relating to the fields of interest of the products purchased by you and your position or profession. We process this data in order to be able to inform you specifically about other products or services in the same field or which may be relevant to your position or profession.

Do we share your data?

Your data may be exchanged with the other business units of Lefebvre Sarrut Belgium in order to keep you informed of the products and services they offer and which may interest you. You may oppose this exchange. To do so, simply send an e-mail to privacy@lefebvre-sarrut.be.



What rights do you have?

As a customer, you can ask us to view your data and, if necessary, have them corrected or even deleted. You can also oppose the use of your data for direct marketing purposes by Lefebvre Sarrut Belgium and/or the exchange of your data with the other business units of Lefebvre Sarrut Belgium.

For the way in which you can exercise these rights, please refer to the relevant section.

You are a user of a digital product

You are a user of a digital product of Lefebvre Sarrut Belgium when you order and purchase a digital product from Lefebvre Sarrut Belgium. Digital products are both online products and applications that run on a stand alone PC. What they have in common is that, in addition to the basic data, data about the use of the products themselves can or must also be processed.

When does Lefebvre Sarrut Belgium process data about you?

When you buy a digital product, you do so in our offices or via an (individual) website of one of the digital products we offer.

What data does Lefebvre Sarrut Belgium process about you?

When you purchase a digital product from us, we process various data about you. We divide these into functional data and additional user data.

a. Functional data - user and system data

The functional data relate to you as a user and to the system.

The data relating to you as a user is also referred to as registration data. These are data in addition to the basic identification data as a customer (such as your name and address, position, company, telephone and/or fax number, e-mail address, VAT number, location), in particular language preference, product serial number, IP address and the login data and license code for your Lefebvre Sarrut Belgium account.

System information includes product type, operating system, software version, network environment, names of other services you have added to or enabled on your Lefebvre Sarrut Belgium product and error messages.

b. Additional user data

The additional user data are both performance data such as log files and error messages as well as activity data such as login actions.

For what purposes do we process these data?

We process the functional data to ensure that your Lefebvre Sarrut Belgium digital products work properly, to provide you with customer support and to meet your preferences. We summarize these purposes under the heading "digital product management".

In addition, we may also use this information to improve our products and offer you other products or services that meet your interests.



We will process the additional user data for you:

- content selection, delivery and reporting. The collection of information and its combination with previously collected information to select and deliver content for you and to measure the delivery and effectiveness of such content. This includes the use of previously collected information about your interests to select content, the processing of data about what content was shown, how often or for how long it was shown, when and where it was shown and whether any action was taken by you in connection with the content, including, for example, clicking on content. This does not include personalisation, which means collecting and processing information about your use of this service in order to tailor advertising and/or content to you over time in other contexts, such as websites or apps.
- Measurement. Collecting information about your use of content and its combination with
 previously collected information used to measure, understand and report on your use of
 content. This does not include personalization, which means collecting and processing
 information about your use of this service in order to tailor advertising and/or content to
 you over time in other contexts, i.e. on other services such as websites or apps.
- Advertising selection, delivery and reporting. The collection of information and its combination with previously collected information to select and deliver advertising to you and to measure the delivery and effectiveness of such advertising. This includes the use of previously collected information about your interests to select advertising, the processing of data about what advertising is shown, how often it was shown, when and where it was shown and whether you took action in connection with the advertising, including, for example, clicking on advertising or making a purchase. This does not include personalisation, which means collecting and processing information about your use of this service in order to tailor advertising and/or content to you over time in other contexts, such as websites or apps.
- Storage of and access to information. The storage of information or access to information already stored on your equipment such as advertising identifiers, device identifiers, cookies, and similar technologies.
- Personalization. Collect and process information about your use of this service in order to tailor advertising and/or content to you over time in other contexts, such as on other websites or apps. The content of the site or app is usually used to draw conclusions about your interests for future selection of advertising and/or content.

For our use of cookies we refer to our separate **Cookie policy**.

What is the basis of this processing?

The processing of functional data is based on the need to correctly execute the agreement between us, while additional user data are processed on the basis of our legitimate interest in improving the products we offer and in bringing them more into line with the needs and requirements of our customers. We also use both types of data on the basis of that same legitimate interest to offer you products or services that may interest you on the basis of the information available (direct marketing).



Do we share your data?

In principle, your data will not be shared with third parties, except within the framework of data storage. In that case, they will always be shared with processors under our control.

How long will your data be stored?

We keep your personal data as long as you use a one of our digital products. We will also keep your data for 10 years after the end of the contractual relationship. This period is determined on the basis of the limitation period under common law, i.e. the period during which you can make a claim against us in connection with the performance of the contract. In order to be able to refute these legal claims and (be able to) defend ourselves against them, we need the data.

What rights do you have?

As a customer, you can ask us not to use your data to improve our products or for direct marketing purposes, i.e. to offer you other interesting products or services.

For the way in which you can exercise these rights, please refer to the relevant section.

You are a trainee/participant in a training course

You are a trainee/particpant if you register for one of the training courses organized by Lefebvre Sarrut Belgium.

When does Lefebvre Sarrut Belgium process data about you?

If you register for one of the training courses that Lefebvre Sarrut Belgium organises, we need information about you. We obtain this information directly from you, if you register yourself, or from your employer, if the registration is done by your employer.

What data does Lefebvre Sarrut Belgium process about you?

This includes data such as name and address, telephone number, e-mail address, position or profession, company, invoicing address, payment details and VAT number if applicable, and the dates on which the training courses take place, as well as the subject areas to which the training courses relate. If the registration is done by your emplloyer, data about the persons who register on behalf of the employer are also processed, as well as payment and invoicing data on behalf of the employer.

For what purposes do we process these data?

We process this data in order to be able to register you for the course you want to take. We summarise this purpose under the heading "training management".

We do not store payment details, including credit card details. We only use them in connection with the payment of the training.

What is the basis for processing?

This processing is necessary in order to be able to execute the agreement you enter into with us as a result of your registration.



For some data, the processing is based on our legitimate interest in doing business, which includes direct marketing. This is particularly the case for the codes relating to the fields of training you have followed. We process this data in order to be able to provide you with targeted information about other training courses in the same field or which may be relevant to your position or profession.

Do we share your data?

Your information will be shared, to a limited extent, with the trainer or lecturer so that he or she can take it into account when preparing the training and, where appropriate, with training institutions or other partners we call upon to organise the training. In the latter case, this is always under the control of Lefebvre Sarrut Belgium.

If the training has been accredited, we must inform the accrediting institution or body of your presence.

What rights do you have?

As a trainee/participant, you can ask us to view your data and, if necessary, to have them corrected or deleted. You can also ask us not to use your data to keep you informed about other courses that may be of interest to you. For the way in which you can exercise these rights, please refer to the relevant section.

You are a visitor to an event or you contacted us

You are a visitor if you present yourself in one of our offices, are present or participate in an event organised by us or at which we are present. You can also contact one of our employees by phone or email. If you do so via the website or another electronic channel, please refer to the relevant section.

When does Lefebvre Sarrut Belgium process data about you?

If you want more information about Lefebvre Sarrut Belgium or one of its products or services, you will have to leave a number of details so that we can provide you with that information.

What data does Lefebvre Sarrut Belgium process about you?

If you want information about Lefebvre Sarrut Belgium or any of its products or services, we will process the data we need to provide you with that information. This includes data such as name and address, telephone number, e-mail address, the reason for your interest and any other data that you (voluntarily) communicate to us.

For what purposes do we process these data?

We only process these data in order to provide you with the requested information or to answer your questions. We summarize these purposes under the heading "communication".

What is the basis for processing?

This processing is based on our legitimate interest in doing business or doing business, which means, among other things, that we must be able to respond to requests for information and other questions and process data to that end.



Do we share your data?

Your data will not be shared with third parties.

What rights do you have?

You can ask us to view your data and, if necessary, have it corrected or deleted. You can also ask us not to use your data to keep you informed about other products or services that may be of interest to you. For the way in which you can exercise these rights, please refer to the relevant section.

You visit one of the websites of Lefebvre Sarrut Belgium (you surf on our websites)

When does Lefebvre Sarrut Belgium process data about you?

You may be looking for information about Lefebvre Sarrut Belgium or one of our products or services and end up on one of our websites.

What data does Lefebvre Sarrut Belgium process about you?

If you are looking for information about Lefebvre Sarrut Belgium online, we process certain data about you. First of all, there are the data you provide to us, such as your name and address, telephone number, e-mail address, position or profession and other information you may provide. In addition, we also process information about you online via cookies or similar technologies when you visit one of our websites, including your IP address (more information can be found in our separate Cookie policy.

For what purposes do we process these data?

We process these data to provide you with information about the products and services offered by Lefebvre Sarrut Belgium.

Your IP address provides us with geographic information about you as a visitor, enabling us to better understand you and improve our websites for everyone.

We summarize these purposes under the heading of "communication".

What is the basis for processing?

This processing is based on our legitimate interest in doing business and doing business, which requires us, in particular, to answer questions asked by third parties.

Do we share your data?

Your data will not be shared.

What rights do you have?

You have the rights that every natural person has, in particular the right of inspection, correction and erasure. For the way in which you can exercise these rights, please refer to the relevant section.



You are an author or a trainer

You are an author if you submit a book, article or other contribution published by Lefebvre Sarrut Belgium and a trainer if you provide a training organised by Lefebvre Sarrut Belgium.

It is also possible that you purchase products or services from Lefebvre Sarrut Belgium or use online products. The processing operations that fall under this are discussed elsewhere.

When does Lefebvre Sarrut Belgium process data about you?

If you write a contribution or provide training, we will process your data when you contact us or we contact you for that contribution or training.

What data does Lefebvre Sarrut Belgium process about you?

If you write a contribution or provide training, we ask you to provide us with a number of details. This includes data such as name and address, telephone number, e-mail address, payment details, position or profession, VAT number and the fields in which you are active.

For what purposes do we process these data?

We process this data in order to manage our relationship with you as an author or trainer. We summarize these purposes under the headings "author management" and "training". In this way we can plan your contribution or training and also take care of its payment.

In consultation with you, we also process data about you (bio and CV) which we then publish on our website or in the publication of which you are the author.

What is the basis for processing?

This processing is necessary in order to be able to carry out the copyright or training agreement you enter into with us.

Do we share your data?

Your information will not be shared with third parties, except with the authorities to whom we are required to disclose it (for tax reasons). You always decide for yourself how your data will be mentioned at the time of publication or in the training course and as such will be made public.

What rights do you have?

You can always view your data and, if necessary, ask to correct them. The deletion of your data is also possible.

You are the contact person or representative of a professional client

Not all customers of Lefebvre Sarrut Belgium are natural persons. Many of our customers are organisations or legal entities. They act through the natural persons who represent them or act as contact persons. In that case Lefebvre Sarrut Belgium will process your data as a representative or contact person of a professional customer (in the form of an organisation or legal entity) of Lefebvre Sarrut Belgium if he orders and purchases a product or service from Lefebvre Sarrut Belgium.



When does Lefebvre Sarrut Belgium process data about you?

If the organisation or legal entity you represent buys a Lefebvre Sarrut Belgium product, it can do so directly, in our offices or on stands at events, via one of the websites of Lefebvre Sarrut Belgium, via an individual website of one of the magazines we offer or via the individual website of one of our online products. In each of these cases, the details of a natural person must always be filled in as a contact person.

What data does Lefebvre Sarrut Belgium process about you?

If your organization or legal entity buys a product from us, regardless of the channel, we ask you to provide us with a number of details. Although these data mainly relate to the organization or legal entity, some data relating to your person will necessarily also be processed. This concerns data such as name and function, telephone number, e-mail address. It is also possible that a link will be made between your data and the areas of expertise that include the products ordered and purchased by you on behalf of your organisation or legal entity.

For what purposes do we process these data?

We process these data to process the transaction (purchase) on behalf of your organisation or legal entity, to follow up the delivery of the product, to provide assistance with any delivery problems, including returns, and other problems related to the purchase of the Lefebvre Sarrut Belgium product. We summarize these purposes under the heading "customer management".

We do not store payment details, including credit card details. We only use them in connection with the purchase of your Lefebvre Sarrut Belgium product.

What is the basis for processing?

Although the processing of these data is necessary in order to be able to carry out the agreement that your organisation or legal entity concludes with us as a result of the purchase, we have no contractual relationship with you as a representative or contact person. Therefore, this processing is based on our legitimate interest to do business or undertake business.

This basis is also used for the processing of data relating to the areas of expertise of the products purchased by your organisation or legal entity and your position. We process these data in order to be able to inform you specifically about other products or services in the same field or which may be relevant to your position or profession.

Do we share your data?

In principle, your data will only be processed internally, within Lefebvre Sarrut Belgium. However, they can be shared with third parties that Lefebvre Sarrut Belgium calls upon, such as printers and parcel delivery companies, as well as other processors or third parties. In each of these cases, the communication of your data is limited to what is strictly necessary for the provision of services on behalf of Lefebvre Sarrut Belgium, so that the data communication is always done under the control of Lefebvre Sarrut Belgium.



What rights do you have?

As a representative or contact person of an organisation or legal entity that is a customer of Lefebvre Sarrut Belgium, you can ask us not to use your data for direct marketing purposes. In that case, you will also no longer be kept informed of new publications, training courses, etc. in fields that may be of interest to you.

For the way in which you can exercise these rights, please refer to the relevant section.

You are a prospect

You are a prospective customer if you do not have any contractual relationship with Lefebvre Sarrut Belgium, but Lefebvre Sarrut Belgium believes that you are eligible as a (potential) customer, both for the order of a product and of a service, such as training.

Although customers may also be approached by us for the purchase of new products or services, we do not regard them as prospects in this statement. This requires that there is no relationship whatsoever with Lefebvre Sarrut Belgium.

When does Lefebvre Sarrut Belgium process data about you?

Lefebvre Sarrut Belgium regularly buys or rents data from third parties, such as Graydon. These data then form the basis for certain marketing campaigns that Lefebvre Sarrut Belgium sets up or carries out.

If Lefebvre Sarrut Belgium buys or rents data from third parties, we will inform you as a result of the action for which the data will be used.

What data does Lefebvre Sarrut Belgium process about you?

The data that Lefebvre Sarrut Belgium processes about you depends on the data that is purchased or rented. Normally these are rather general data that allow us to contact you in order to present our products and services in general terms, although sometimes this may also relate to a specific sector or discipline.

This includes information such as name and address, telephone number, e-mail address, position or profession and the sectors or disciplines in which you are active.

For what purposes do we process these data?

We process these data in order to offer you products or services from Lefebvre Sarrut Belgium.

What is the basis for processing?

This processing is based on our legitimate interest in doing business, which includes direct marketing, i.e. the activities aimed at contacting new customers.

Do we share your data?

Lefebvre Sarrut Belgium does not sell or rent personal data to third parties. We will only share your data with third parties in the manner described in this Declaration. This means that we



can practically share your data with the parties mentioned in the section 'How we share your data'.

What rights do you have?

As a prospect you can always ask us not to use your data for direct marketing purposes. This is commonly referred to as the right of objection. For the way in which you can exercise these rights, please refer to the relevant section.

You are a supplier or contact person of a legal entity that is a supplier (including teacher/trainer)

You are a supplier of Lefebvre Sarrut Belgium if you sell certain products or services that we need to provide our services to us. We do not consider <u>authors</u> as suppliers, but as partners in the development of knowledge. We approach the processing of their data separately.

When does Lefebvre Sarrut Belgium process data about you?

If you sell Lefebvre Sarrut Belgium a product or service, you are a supplier. In that case we will process your data, either as a supplier or as the supplier's representative or contact person (if that is an organisation or legal entity) in order to order, pay for and maintain the product or service.

What data does Lefebvre Sarrut Belgium process about you?

When we purchase a product or service from you, we always process some basic information about you and, if applicable, your organisation or legal entity.

This includes information such as name and address, telephone number, e-mail address, sales address, billing address, payment details, position or profession (if applicable as representative or contact person), VAT number and the sectors in which you are active.

For what purposes do we process these data?

We process this data to enable our transaction with you (purchase of products or services), the delivery of the product or service, assistance with any delivery problems, including returns, and other problems related to the purchase of the product or service. We summarize these purposes under the heading of "supplier management".

What is the basis for processing?

This processing is necessary in order to be able to execute the agreement we conclude with you as a result of our purchase.

Do we share your data?

Your data will only be shared with the services responsible for orders (logistics) and payments (accounting).

How long do we keep your data?

We keep your data as long as you provide us with products or services. This storage will continue for 10 years after the end of the relationship. This period is determined on the basis



of the limitation period under common law, which allows us to take legal action against the performance of a service up to 10 years after it has been performed. To this end, we must of course have the necessary information at our disposal.

You can always ask us to view your data and, if necessary, have it corrected or deleted. For the way in which you can exercise these rights, please refer to the relevant section.

You are a person of interest to Lefebvre Sarrut Belgium

It is possible that you are in no way connected to or with Lefebvre Sarrut Belgium, but that Lefebvre Sarrut Belgium is of the opinion that you can (in the future) serve its interests in one way or another. This may have to do with the position you hold, such as a professional in publishing, the mandate you hold, such as a politician or a professor, or the activities you carry out, such as a lawyer or journalist. What these people have in common is that, in one way or another, they create goodwill for Lefebvre Sarrut Belgium.

When does Lefebvre Sarrut Belgium process data about you?

Lefebvre Sarrut Belgium processes data about you as soon as it believes that you may be a person or organisation of interest to it and may contribute to or assist in the performance of its activities.

What data does Lefebvre Sarrut Belgium process about you?

Lefebvre Sarrut Belgium processes a number of basic data about you, such as your name and address, telephone number, e-mail address, position or profession or any other reason that makes you interesting for Lefebvre Sarrut Belgium. We may also process certain data that allows us to invite you to certain events.

For what purposes do we process these data?

We process these data in order to be able to address or contact you in the context of specific circumstances or if certain opportunities arise. We summarize this under the heading "public relations".

What is the basis for processing?

For this processing of data, we invoke our legitimate interest in doing business and doing business. This includes public relations or the possibility of contacting other persons in response to certain circumstances or in the context of opportunities related to our business activities.

Do we share your data?

Your data will only be processed internally by the services that need them.

How long do we keep your data?

We keep your data as long as you can play a role in your function, mandate or activity for Lefebvre Sarrut Belgium. As soon as this is not (or no longer) the case, your data will be deleted.

You can always ask to view your data and, if necessary, have them corrected or deleted. For the way in which you can exercise these rights, please refer to the relevant section.



Data of children

Lefebvre Sarrut Belgium does not focus on children under the age of thirteen. Although visitors of all ages can navigate our websites, we do not knowingly collect or solicit personal information from children under thirteen without parental consent. If, following a notification from a parent or guardian, or discovery in any other way, it appears that a child under the age of thirteen has been wrongly registered on our site using false data, we will cancel the child's account and remove the child's personal data from our registration.

B. HOW WE PROCESS AND USE PERSONAL DATA

Lefebvre Sarrut Belgium uses the personal data it collects for various purposes. These purposes are also related to your role or capacity for which we refer you to the respective sections. At this point we would like to indicate in general terms for which purposes we process personal data.

Lefebvre Sarrut Belgium uses the data we collect to provide you with the Lefebvre Sarrut Belgium products and services we offer, to communicate with you, for example to inform you about your account, new Lefebvre Sarrut Belgium products or services, security and other types of updates.

Lefebvre Sarrut Belgium uses the data for the following purposes:

To offer our products including customer service (customer management)

We use personal data to provide, operate and support our Lefebvre Sarrut Belgium products and services. This processing is necessary for the execution of the agreement we have with you.

For the use and improvement of digital products

We process your data to enable you to use our digital products. This means that we inform you about security or software updates and keep you informed about a support issue. This processing is necessary for the performance of the agreement we have with you.

We also use additional data, in particular for research purposes and to develop and improve our Lefebvre Sarrut Belgium products and services, including maintaining and improving the performance of our Lefebvre Sarrut Belgium products and services, developing and adding new products, features or capabilities, such as the use of error messages to improve security features, the use of queries and clicks to improve the relevance of search results and the use of usage data to determine which new features should be given priority. This processing is necessary to serve our legitimate interest.

More information can be found in our separate **Cookie policy**.

For the management of training courses

We use personal data to organise training courses and consequently to register for them, as well as to keep you informed of future interesting training courses. In the same context, we also process the personal data of the persons who provide the training courses. This processing is necessary for the execution of the agreement we have with you.



For accounting purposes

The purchase and sale of products and services require the necessary accounting actions. It is therefore only normal that we process your personal data, as a customer or supplier, as a trainee or trainer, to process payments for the products or services. This processing is necessary for the execution of the agreement we have with you.

For dispute management

If a dispute arises as a result of the delivery of a product or service with you as a customer or as a supplier, your personal data will be processed in the context of that dispute. In that case, your data may be disclosed to lawyers and other professional parties for the purpose of defending our interests.

For supplier management

We use the data of suppliers, both natural persons and natural persons representing a supplier, to order goods or services, to pay for them and to take care of their maintenance. This processing is necessary for the performance of the agreement we have with you.

Direct marketing (including advertisements)

We use the information we collect to offer you other products or services. This concerns both customers and prospects, i.e. natural persons who are not (yet) customers.

To this end, we may, for example, contact you by e-mail or other electronic means of communication to inform you about new Lefebvre Sarrut Belgium products or services. We also use cookies and similar technologies to offer you the most relevant Lefebvre Sarrut Belgium advertisements.

This includes the use of data to personalize communication with you, through the development of business intelligence.

This processing is necessary to serve our legitimate interest.

For information about managing e-mail subscriptions and promotional communications, please refer to <u>Your rights</u> and <u>choices</u>.

For communication

We use personal data to answer questions from customers, but also from third parties who visit us at events or visit our websites. Where the communication relates to customers, this includes customer management or management of digital products.

For public relations

We process personal data of natural persons and organizations that can create the necessary goodwill for our organization. This processing is based on our legitimate interest.



C. HOW WE SHARE PERSONAL DATA

Lefebvre Sarrut Belgium does not sell or rent personal data to third parties. We will only share your data with third parties in the manner described in this Declaration. This means that we can practically share your data with the following third parties.

External suppliers - processors

Lefebvre Sarrut Belgium uses several external suppliers to perform services, such as website management and hosting, online purchase and shipment of products, credit card processing and e-mail communication. We will share your personal information only when necessary, such as to complete a transaction or to provide products or services you have ordered or authorized, and only with sellers or agents who work on our behalf for the purposes described in this Notice. In that case, your personal data will be shared with these agents or contractors, but only for the purpose of performing services on behalf of and on behalf of Lefebvre Sarrut Belgium and in accordance with this Declaration. To this end, we conclude the necessary agreements with these parties, in particular processing agreements.

Lefebvre Sarrut Belgium products may contain links to third party products or applications whose data protection policies may differ from those of Lefebvre Sarrut Belgium. If you provide personal data to one of these third parties or their products, your data will be subject to their policies or privacy statements. We advise you to read these privacy statements carefully. For questions

about external suppliers, please send an e-mail to privacy@lefebvre-sarrut.be.

Professional organisations

Lefebvre Sarrut Belgium may share the relevant details of a product or service and your relevant personal data with professional organisations in order to be able to offer you a complete service within the framework of professional completion or continuing education. For example, if you take part in a training or study day organised by us, we will have to share certain data with professional organisations in order to ensure that your participation in the context of continuing education is approved. Sharing data with professional organisations is necessary to carry out the agreement we have with you.

Companies and subsidiaries of Lefebvre Sarrut Belgium associated with Lefebvre Sarrut Belgium

We share information with companies associated with Lefebvre Sarrut Belgium and in which Lefebvre Sarrut Belgium has an interest as well as with subsidiaries. This concerns in particular the companies and entities of the Editions Lefebvre Sarrut Group. This communication is limited to business purposes, such as internal administration, the promotion of Lefebvre Sarrut (Belgium) products or services and the supply or delivery of these products and services. It is our justified interest to share data with these parties for these purposes. In this way, it is possible that you are approached by a French company of the Lefebvre Sarrut group to purchase a product or service, although at that time you can always indicate that you do not wish to do so.

Mandatory provision of data

In certain cases, we are required by law to disclose information about you.



Where required by law, strictly necessary for the performance of the Services or to protect our rights, or the rights of our affiliated companies or our users, we will disclose your personal data to law enforcement agencies, investigative bodies, our affiliates or in legal proceedings.

Sale or merger

We may share your personal information in the event of a merger, acquisition or sale of all or part of our assets. Of course we will inform you about this via e-mail and/or a clearly visible notice on our website and inform you about your rights.

D. THE PRINCIPLES GOVERNING THE USE OF PERSONAL DATA

In order to process your personal data, we apply various principles. These depend on the circumstances and especially on your capacity.

The principles on which we base ourselves are:

Execution of an agreement

The processing of your personal data may be necessary to carry out the agreement you have with us. For example, to complete the purchase of your Lefebvre Sarrut Belgium product, to register and maintain your account, to help with delivery problems, to handle returns, to register your Lefebvre Sarrut Belgium product and to ensure that your Lefebvre Sarrut Belgium product performs its basic functions in a secure manner, to pay you as author, etc.

Legitimate interests

In other cases, we will use your personal data for our legitimate interests, such as our interest in doing business or doing business, our interest in communicating, or our interest in securing the infrastructure necessary to conduct our business. If we process your personal data on the basis of our legitimate interest and there is no unsubscribe mechanism available to you (e.g. in your Lefebvre Sarrut Belgium product settings), you may object to the processing. You can exercise this objection by sending an e-mail to privacy@lefebvre-sarrut.be.

Legal obligation

Sometimes we are required by regulations to process personal data. This is the case, for example, with the data on authors that we have to communicate to the FPS Finance within the framework of the withholding of withholding tax on professional income.

Permission

In some cases we need your permission. This is particularly the case when we want to use electronic contact details such as your email address to send you publicity messages. This permission is only required if you are a prospective customer and therefore does not apply to customers.

In order to know which basis we apply and when, we refer to the explanation of the various roles and capacities.



E. SECURITY AND STORAGE OF YOUR PERSONAL DATA

Security

Lefebvre Sarrut Belgium takes the protection of your personal data seriously and makes every effort to secure this personal data. Nevertheless, despite all reasonable precautions, no security system is infallible.

We use a range of appropriate technical and organisational measures and comply with industry standards to protect your personal data and help prevent it from being stolen or misused, improperly accessed, disclosed, altered or destroyed. To this end, we store your personal data, for example, on computer systems with limited access and in controlled environments. In addition, we ensure that our external data centre suppliers provide appropriate security measures. In addition, your data is encrypted during transmission over the Internet. Your passwords are stored encrypted and can no longer be read, which means that they cannot be restored or disclosed by anyone, including Lefebvre Sarrut Belgium.

Access to your Lefebvre Sarrut Belgium account details and our services is only possible via an individual username and password. In order to protect the confidentiality of your personal data, you must ensure that you keep your password secret and do not disclose it to third parties. Warn us immediately if you think that your password has been misused. Also make sure that you always log out and close your browser at the end of a session.

If you have any questions about the security of your personal data, please contact us at mailto:privacy@lefebvre-sarrut.be.

Storage

Personal data collected by Lefebvre Sarrut Belgium may be stored and processed in Belgium and in the United Kingdom (where our registered offices are located), or in any other country where Lefebvre Sarrut Belgium or companies, subsidiaries or processors associated with Lefebvre Sarrut Belgium are established or have facilities.

If your personal data is transferred to third countries, i.e. countries outside the European Union, Lefebvre Sarrut Belgium has provided appropriate safeguards. This may be the application of the standard contractual clauses as approved by the European Commission. It is also possible that the country of destination has an adequate level of protection or that we can base the transfer, in rather exceptional cases, on one of the derogations provided for by law.

If you have any questions about the transfer of personal data to third countries and the safeguards, please contact us at mailto:privacy@lefebvre-sarrut.be.

F. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Lefebvre Sarrut Belgium retains your personal data for as long as necessary to achieve the purposes for which we process them.

This means that we keep your data as long as you have a relationship with us, i.e. as long as you are a customer or supplier. At the end of that relationship, we will retain your data for another 10 years, i.e. the period during which you can hold us liable in connection with the performance of our contract and during which we can only refute that claim by submitting the data we have.



This means, for example, that we retain your data for as long as necessary to use our websites and your Lefebvre Sarrut Belgium products, but also for as long as necessary to enable us to offer products to you and/or provide services to you, to comply with applicable laws (including those relating to the retention of documents), to resolve disputes with parties and otherwise to conduct our business activities.

The retention period depends on the capacity you have and the purpose we pursue.

We retain customer data for as long as you are a customer, up to 10 years after the end of the customer relationship, to enable us to refute any legal claims.

We retain data about users of a Lefebvre Sarrut Belgium product for as long as you are a user, up to 10 years after the end of use, in order to allow us to refute any legal claims.

We keep data about students for up to 10 years after the end of the training, also because in practice it turns out that students ask us for attendance certificates afterwards.

We store visitor data, whether physical or online, only to a limited extent, unless the visitor also has another capacity and the visit is in that capacity.

We only keep data about prospective clients for a shorter period of time because they (may) quickly become obsolete. Nevertheless, we may later obtain and process prospect data via third parties.

We retain supplier data for as long as you are a supplier, up to 10 years after the end of our relationship, to enable us to refute any legal claims.

We retain data about authors as long as you cooperate with us as an author, also here until 10 years after the end of our cooperation, in order to allow us to refute any legal claims.

We retain information about representatives or contact persons of organisations or legal entities for as long as the organisation or legal entity is associated with us, as a customer, supplier or in any other way, for 10 years after the end of that relationship, in order to allow us to

It is not because data are kept after the end of the relationship that they are kept for all possible purposes. In principle, data are kept passively after the end of the relationship, which means that the data are only kept for the purpose of possible use in the context of legal claims.

All personal data that we retain is subject to this Privacy Statement and our internal data retention guidelines. If you have any questions about this, please send an e-mail to privacy@lefebvre-sarrut.be.

G. YOUR RIGHTS

Lefebvre Sarrut Belgium wants to ensure that you remain in control of how we use your personal data. To this end, you can, in particular, exercise the rights granted to you by the applicable regulations. You can do this in the following ways:

- you can ask us to view the personal data we process about you;
- you can ask us to correct the personal data we process about you;
- in certain cases, you may ask us to delete the personal data we process about you,
- in certain cases, you may ask us to block or limit the personal data we process about you



in cases where we base the processing on our legitimate interests, you may object to such
processing, after which we will weigh our interests against your interests in order to
determine which interests outweigh your interests or to determine whether additional
measures can or must be taken to restore the balance.

In order to know which rights you can exercise when, we refer to the explanation of the different roles and capacities where this is explained in more detail.

If you send us a request, we will respond to your request as soon as possible, but in any case within 30 days. You also always have the possibility to manage your communication, marketing and advertising preferences. For this we refer to the explanation of your choices.

In addition to the rights expressly granted to you by the regulations, you can always submit other requests to us.

- You can inform us about changes in your personal data with the request to include these changes. We trust that you will ensure that your personal data is complete, correct and up to date. Please inform us immediately of any changes or inaccuracies in your personal data by contacting privacy@lefebvre-sarrut.be.
- You can always do the same if you discover that there are inaccuracies in your personal data.
- In certain cases, you may also ask us or give us permission to send the personal data you have provided to an external party.

We are committed to working with you to find a solution if you have a complaint or problem with the way we process your personal data. If you are of the opinion that we have not been able to help you with your complaint or problem, you are also always entitled to submit a complaint to the Data Protection Authority (contact@apd-gba.be - (02) 274 48 00 - Drukpersstraat 35, 1000 Brussels).

If necessary, you can also turn to the court of first instance, sitting in summary proceedings.

H. YOUR CHOICES

In addition to exercising your rights, you can also make choices when managing your account with us, particularly in the areas of communication, marketing and advertising.

Lefebvre Sarrut Belgium account

If you

- want to access your profile data,
- want to edit or delete your profile data,
- wants to change your password,
- want to close your account or
- would like to request that your profile data be deleted,

you can do this by logging into your Lefebvre Sarrut Belgium account or by sending an e-mail to <u>privacy@lefebvre-sarrut.be</u>. If it is not possible to access certain personal data collected by Lefebvre Sarrut Belgium via your Lefebvre Sarrut Belgium account or directly via your Lefebvre Sarrut Belgium product, please send an e-mail to <u>privacy@lefebvre-sarrut.be</u>.

We will always respond to requests for access to or deletion of your personal data as quickly as possible, but in any case within 30 days.



Your communication, marketing and advertising preferences

You may choose not to receive direct marketing communications from Lefebvre Sarrut Belgium by following the instructions included in each email we send to you, via the "Unsubscribe" or "Unsubscribe" button.

You can also unsubscribe from e-mail subscriptions or messages by sending an e-mail to privacy@lefebvre-sarrut.be. We respect your choice and will no longer send you promotional emails as soon as you unsubscribe or change your communication settings.

Please note that regardless of your communication settings, we will continue to communicate with you on business topics, such as changes to terms and conditions, policy updates, software updates for Lefebvre Sarrut Belgium products, routine customer service messages, such as information about current or past purchases, product deliveries, service interruptions, personal data breaches or other important information about a product or service you own, such as discontinuing support or security issues.

After unsubscribing from receiving emails from us, we will not use your email address for advertising activities based on interest.

I. CONTACT US

If you have any questions about the use of your personal data, please send an e-mail to privacy@lefebvre-sarrut.be.

Unless otherwise stated, Lefebvre Sarrut Belgium is responsible for processing the personal data to which this policy applies. Our address is: Hoogstraat 139/6, 1000 Brussels, Belgium.

J. MODIFICATION OF THIS STATEMENT

Lefebvre Sarrut Belgium may amend or update this Declaration if necessary. We advise you to read this declaration regularly for more information on how Lefebvre Sarrut Belgium uses and protects your data.

When we update this policy, we will change the date behind 'Last updated' at the top of the policy.

If there are important or substantial changes in the general policy or in the way Lefebvre Sarrut Belgium uses your personal data, we will notify you of these changes either by posting a notice before they come into effect or by sending you a notification directly.