GENERAL POLICY ON DATA PROCESSING

Lefebvre Sarrut Belgium nv (hereinafter "we" or "Lefebvre Sarrut Belgium"), takes your data processing rights seriously. In this statement, Lefebvre Sarrut Belgium explains how it collects, processes and uses your personal data. It thus constitutes the general policy of Lefebvre Sarrut Belgium in the field of data processing and data protection.

In doing so, Lefebvre Sarrut Belgium aims to comply as much as possible with the laws and regulations relating to the processing of personal data.

The data controller is Lefebvre Sarrut Belgium, registered in the Crossroads Bank for Enterprises under No 436 181 878, having its registered office at 1000 Brussels, rue Haute 139 - bus 6. As far as processing is concerned Lefebvre Sarrut Belgium shares responsibility for "customer management" and "prospect management (direct marketing)" with Intersentia, also a subsidiary of Lefebvre Sarrut Belgium SA, registered in the Crossroads Bank for Enterprises under no. 458,376,171, with registered office at 2640 Mortsel, Groenstraat 31.

For any questions regarding this statement and the data processing policy, please contact our customer service team. For questions other than a request for information, we may ask you to identify yourself so that we can be sure that we are providing the requested information and data to the correct person.

When does Lefebvre Sarrut Belgium collect and process data?

Lefebvre Sarrut Belgium collects and processes data about you when you subscribe to a (paper or electronic) magazine, a (paper or electronic) advice letter or a database, when you order a book or file, when you subscribe to a seminar, when you subscribe to a free e-zine or our free newsletters, when you write as an author for our publications or training courses or when you contact us in any other way.

In certain cases, Lefebvre Sarrut Belgium also processes data obtained from third parties in order to present you with interesting offers. In this case, you will be informed of the source from which we obtained the data. If it concerns electronic contact data (e-mail addresses), we ask you, where necessary, for example for prospects who do not have any customer relationship with one of the business units of Lefebvre Sarrut Belgium or with Intersentia, to give us permission beforehand to send you commercial or advertisments.

To the extent that Lefebvre Sarrut Belgium carries out customer and prospect management (direct marketing) together in common with Intersentia, customer and prospect data are processed by both entities and exchanged between them, in particular in order to synchronise existing subscriptions and to coordinate the various marketing actions. If you do not wish us to do so, you may oppose the exchange of your data with Intersentia (see below).

What data does Lefebvre Sarrut Belgium collect and process?
It concerns the data you communicate to us, such as your name, address, e-mail address and professional data, such as company name and VAT number, as well as the data about your subscriptions, orders, registrations or other contacts.

We collect this information both when you fill in our paper forms and when you do so electronically. When you visit our website, cookies are used, about which you can find more information in our policy on cookies.

For what purposes does Lefebvre Sarrut Belgium collect and process data?

The data we collect is processed for our subscription administration, customer management, the delivery of the products or services you request, order, the training courses you register for and/or the management of the relationship with you as an author or trainer. It is also used for the promotion of other Lefebvre Sarrut Belgium and/or Intersentia products and services, such as promotional offers (unless you object). It is also possible that your data will be processed in order to communicate with you as an interested party in other relationships.

As far as our website is concerned, we tailor its content and user-friendliness as much as possible to you as a user. In addition, we process your data in order to comply with the obligations arising from the provision of a website and its content and to enable you to make use of the interactive applications and services on this website.

What are the principles for the collection and processing of data by Lefebvre Sarrut Belgium?

In principle, we collect and process your data on the basis of the contractual relationship we have with you as a result of your subscription, order and/or registration. Where the processing is not necessary to carry out the contractual relationship, it is based on our legitimate interests as a company, in particular the freedom of enterprise and information. In doing so, we always ensure that there is a balance between our interests and your interests, for example by granting you a right of opposition.

Processing may also be based on the consent you give us, particularly if you are a prospect to whom we wish to send commercial or advertising messages.

Will the data be disclosed to third parties?

Your data will be processed by Lefebvre Sarrut Belgium and, where applicable, jointly with Intersentia, mainly internally. It is possible that for certain specific services we may call upon third parties who will process the data for us, the so-called processors. In that case, it is possible that your data will be passed on to these processors, but only for the service in question and always under the control of Lefebvre Sarrut Belgium and, where applicable, jointly with Intersentia. Sometimes we are also obliged to pass on data about you. This is particularly the case where we are legally obliged to do so or when public authorities have the right to request data from us. In that case, we will check whether all the conditions for doing so have been met.

In principle, your data will not be transferred to third countries (outside the European Union) or international organisations. If that happens, for example in the context of data storage, we ensure that the transfer is made to third countries that provide an adequate level of protection or that the transfer is subject to appropriate safeguards or that one of the
regulatory derogations, such as the performance of the contractual relationship, applies. If you have any questions about this, please contact our customer service department.

**How long do we process your personal data?**

We retain your data as long as we have a contractual relationship with you, as a customer, subscriber, supplier, author or trainer. Even after that relationship has ended, we will continue to retain your data during the statute of limitations, this is the period in which we can be held liable for the execution of this relationship. It is in principle ten years.

We process prospective data as long as the data subject does not indicate that he or she wishes to be deregistered or that his or her data may no longer be used for direct marketing purposes.

**Your rights**

The regulations grant you several rights.

You may at any time oppose the use of your data by Lefebvre Sarrut Belgium and/or Intersentia for direct marketing purposes. If you do not wish to be kept informed or only partially informed of the offers of Lefebvre Sarrut Belgium and/or Intersentia, please contact our customer service department. You can also indicate whether your objection concerns Lefebvre Sarrut Belgium or Intersentia or both publishers.

You can always view the data we process about you and, if necessary, have it corrected. All you have to do is request it from our customer service department, with proof of your identity. This is to prevent your data from being passed on to anyone who is not entitled to it.

To the extent that the processing of your personal data is based on our legitimate interests, you may oppose this. However, you must bear in mind that your opposition means that we will no longer be able to serve you in the same way. Moreover, we will check whether your interests are not outweighed by our interests, in which case the processing will continue.

Where processing is based on consent, such as when using your electronic contact details for direct marketing purposes, you can always withdraw your consent via the unsubscribe option offered to you or via a specific communication to our customer service department.

**Security measures**

Lefebvre Sarrut Belgium takes appropriate measures, both technical and organisational, to secure your personal data as much as possible. In doing so, we focus on the standards usually applied in our sector of activity.

**Changes**

Lefebvre Sarrut Belgium reserves the right to modify this declaration and/or this policy. Changes will be communicated to users via the website.