

# Policy on privacy and protection of personal data

#### Introduction

A.Wilsens by attaches great importance to your privacy and the protection of your personal data. In this privacy policy, A.Wilsens by explains which personal data it collects, why and how it processes them and with whom it shares them. It is also explains which rights you have with regard to your personal data and how you can contact A.Wilsens by or make a complaint.

In case you, as a client, would provide A.Wilsens by with personal data of third parties, e.g. employees, independent co-workers or other contacts, A.Wilsens by asks you to inform them about this privacy policy before sharing their personal data with A.Wilsens by.

## Who is responsible for processing your personal data?

The legal entity processing your personal data is A.Wilsens bv ('controller'). A.Wilsens bv is a private company with limited liability with registered offices at 3040 Sint-Agatha-Rode, Verstrekenstraat, 29. A.Wilsens bv is registered in the Business Register under number 0824.245.424.

For any question relating to this privacy policy or to exercise your rights concerning your personal data, you may contact A.Wilsens by by regular mail at the above-mentioned address or at the following email address: <a href="mailto:ann@reconnecttoday.eu">ann@reconnecttoday.eu</a>.

## Why does A.Wilsens by process your personal data?

A.Wilsens by processes the personal data of its clients, employees or other independent coworkers of its clients or contacts of its clients, of which A.Wilsens by receives the personal data itself, via its clients, and this for the following purposes:

- to provide the services requested by its clients, i.e. legal advice, advice regarding alternative dispute resolution methods, services related to mediation, drafting of agreements, advice regarding operational business related questions, providing training, etc.; to exchange information with you and to answer your questions (by mail, email, telephone, etc.) concerning A.Wilsens bv's services, i.e. the requesting, receiving and discussing of the assignment, to keep you informed about the status of your file, to take necessary steps with regard to third parties, authorities and others,
- to comply with legal obligations such as, among others, A.Wilsens bv's legal, accounting, fiscal and deontological obligations,
- for invoicing and administrative purposes.

A.Wilsens by processes the personal data of its **suppliers** and **business contacts** from whom it receives the personal data directly and this for the following purposes:



- to conclude and execute agreements and collaborations in connection with A.Wilsens bv's services.
- to comply with legal obligations such as, among others, A.Wilsens by's legal, accounting, fiscal and deontological obligations,
- for invoicing and administrative purposes.

#### What is the legal basis for the processing of your personal data?

If you are a client, the processing of your personal data by A.Wilsens bv is necessary for the **performance of the agreement** you entered into with A.Wilsens bv concerning A.Wilsens bv's services.

A.Wilsens by also processes your personal data to comply with its **legal obligations** such as, among others, A.Wilsens by's legal, accountancy, fiscal and deontological obligations.

In case you are an employee or an independent co-worker of A.Wilsens by's client and the latter has appointed you as its contact person, A.Wilsens by processes your personal data based on the **legitimate interest** of both A.Wilsens by and A.Wilsens by's client to have contact with you in the context of A.Wilsens by's services.

If you are a contact of a client and A.Wilsens bv has received your personal data from its client, for example because you are an expert, a supplier, an accountant or because you cooperate with A.Wilsens bv's client in some other way, A.Wilsens bv processes your personal data on the basis of the **legitimate interests** of both A.Wilsens bv as well as A.Wilsens bv's client to better organise A.Wilsens bv's services to A.Wilsens bv's client.

A.Wilsens by is of the opinion that your interests or fundamental rights and freedoms do not outweigh the legitimate interests of A.Wilsens by's client and A.Wilsens by to process your personal data. If you disagree with this point of view and you do not want your personal data to be processed for the above-mentioned purposes, please contact A.Wilsens by at <a href="mailto:ann@reconnecttoday.eu">ann@reconnecttoday.eu</a> as you have the right to oppose such processing (see further: What are your rights?).

If you are a supplier of A.Wilsens bv, the processing of your personal data by A.Wilsens bv is necessary for the **performance of the agreement** you entered into with with A.Wilsens bv regarding its services.

If you are a business contact of A.Wilsens bv, A.Wilsens bv processes your personal data on the basis of its **legitimate interest** to have contact with you in relation to A.Wilsens bv's services.

A.Wilsens by is of the opinion that your interests or fundamental rights and freedoms do not outweigh the legitimate interests of A.Wilsens by to process your personal data. If you do not agree with this and you do not want your personal data to be processed for the above-



mentioned purposes, please contact A.Wilsens by at <a href="mailto:ann@reconnecttoday.eu">ann@reconnecttoday.eu</a> since you have the right to oppose such processing (see further: What are your rights?).

# What personal data does A.Wilsens by collect?

A.Wilsens by processes, if necessary, the following personal data:

- name, first name, profession, company name, company address, legal form, email address and (mobile) phone,
- nationality, identity card, national number, VAT number, bank data, company number,
- information concerning the file or the company: information concerning the file may contain personal data of other natural persons. Such personal data are not to be processed by A.Wilsens by in a separate file. These personal data are part of the files that are processed in the document management system. Because of A.Wilsens by professional obligation of confidentiality both as a lawyer and mediator, A.Wilsens by is exempted from informing the persons concerned about this processing.

The provision of certain of your personal data can be a legal requirement and/or a necessary requirement to be able to enter into an agreement with A.Wilsens bv. Not providing these data can result in the fact that no agreement can be entered into with A.Wilsens bv or that A.Wilsens bv will not be able to deliver its services.

## With whom does A.Wilsens by share your personal data?

In general, A.Wilsens by does not share your personal data with third parties.

In well-defined cases, however, it might:

- if this is required by a legal provision or a court order,
- with regard to the services provided by A.Wilsens bv, it may be necessary that A.Wilsens bv must communicate your personal data to official authorities, experts, bailiffs, notaries, etc. both in Belgium and abroad, if you give them instructions to do so,
- if it is useful or necessary for the purpose, to the processors who processes the personal data on behalf of A.Wilsens bv, this in order to execute well-defined processing activities such as IT, hosting and communication service providers,

In such a case, A.Wilsens by will enter into a processing agreement with the parties who will have access to your personal data for the execution of their services.

#### How are your personal data transferred abroad?

Your personal data will not be transferred abroad, unless you give us permission to do so.

#### How long are your personal data stored?



Concerning the processing of personal data with regard to the services provided by A.Wilsens bv, A.Wilsens bv processes your personal data for as long as necessary to provide the services you requested.

When your contractual relationship with A.Wilsens bv has ended, A.Wilsens bv will process these personal data as long as necessary for fiscal, accounting or other legal obligations.

## What are your rights?

You have a number of rights with regard to the personal data A.Wilsens by processes about you, in particular:

- **Right of access**: you have the right to ascertain what type of personal data A.Wilsens by holds about you, how it processes your personal data and you are entitled to a copy of your personal data.
- **Right to rectification**: you have the right to have any inaccurate personal data which A.Wilsens by holds about you updated or corrected.
- **Right to erasure**: in certain circumstances you can ask A.Wilsens by to erase your personal data.
- Right to restriction: you have the right to ask A.Wilsens by to stop using your personal data in specific circumstances, such as when you are of the opinion that the personal data A.Wilsens by holds about you are inaccurate or that A.Wilsens by use of your personal data is unlawful. If you exercise this right in a valid way, A.Wilsens by will save your personal data and will no longer process them until this point of discussion has been resolved.
- **Right of object**: if A.Wilsens by processes your personal data on the basis of its legitimate interests, you have the right to object to this use.
- Right to portability: you may request A.Wilsens by to provide you with certain personal data that you have provided in a structured, common and machine-readable format and you have the right to ask A.Wilsens by to transfer your personal data directly to another data controller when this is technically feasible.

In order to exercise your rights concerning your personal data, you may contact A.Wilsens by via the following email address: <a href="mailto:ann@reconnecttoday.eu">ann@reconnecttoday.eu</a>.

A.Wilsens by may ask you for proof of your identity for security reasons and to avoid unauthorized disclosure or misuse of your personal data.

Within one month after receipt of your request, A.Wilsens by will deal with the respective requests. In case A.Wilsens by has legitimate reasons not to comply with this request, it will contact you and motivate its decision.

#### Questions and complaints



In case you have any questions, remarks or complaints with regard to this policy or the way A.Wilsens by processes your personal data, do not hesitate to send an email to <a href="mailto:ann@reconnecttoday.eu">ann@reconnecttoday.eu</a>.

If you have any complaints regarding the way in which A.Wilsens by processes your personal data, you can file a complaint with the Belgian Data Protection Authority (<a href="https://www.dataprotectionauthority.be">www.dataprotectionauthority.be</a> ).

#### **Amendments**

A.Wilsens by reserves the right to amend this privacy policy in order to comply with the applicable privacy legislation. A.Wilsens by may revise this privacy policy at any time by making amendments. The current version of this privacy policy can be found on A.Wilsens by's website at any time.