

# Privacy Policy

## 1. Why this Privacy Policy?

NEO LEGIA attaches great importance to the protection of your privacy and personal data. We collect and process your personal data in accordance with the legal provisions applicable in this respect, namely the Belgian Law of 8 December 1992 on the protection of privacy with regard to the processing of personal data ("Privacy Law") and the European Regulation of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("Regulations").

We would like to inform you of any processing operations relating to your personal data and your rights in this regard. By using our website, you expressly accept that your personal data will be collected and processed by NEO LEGIA in the manner described in this document.

We reserve the right to make changes to our Privacy Policy at any time. Any substantial modification will always be clearly communicated on our website. However, we advise you to read this document regularly.

## 2. Who processes your personal data?

NEO LEGIA is the website controller.

### Contact details:

NEO LEGIA SA

Avenue Jean Jaurès 50

1030 SCHAERBEEK

Belgium

Company number (VAT-BE) 0897.073.024

E-mail : [privacy@neolegia.be](mailto:privacy@neolegia.be)

## 3. Which personal data do we collect?

The processing of your personal data is limited to what is strictly necessary for fulfilling the purposes set by NEO LEGIA. The categories of data which will be processed are listed below.

- Identification data
- Financial data
- Geolocalisation data

- Connection data (IP address, etc.)
- Personal characteristics
- Physical data
- Lifestyle
- Household and family composition
- Hobbies and interests
- Affiliations and memberships
- Judicial data
- Spending patterns
- Education and training data
- Job and function data
- National registry number and social security identification number
- Photos/Snapshots
- Recordings/Sound recordings

#### 4. What are the purposes for collecting data?

NEO LEGIA collects your personal data for the sole purpose of making sure your experience of using the website is optimal, personalised and secure. More of your personal data may be collected if you use our website more intensively.

The processing of your personal data is therefore crucial to ensure the website functions properly and to provide you with our services. NEO LEGIA undertakes to process your personal data for the following sole purposes:

- Allow you to access your "user account"
- Manage the contractual relationship
- Provide the User with a service that is both general and personalised, including sending useful information, newsletters, providing support and complaint follow-up
- Improve and customise our services and products
- Send promotional offers if you have expressly agreed to receiving them (direct marketing). In this case, you are free to withdraw your consent at any time

When you visit our website, specific data may be collected for statistical purposes. This data allows us to optimise your user experience. It includes your IP address, the geographic area from which you view the website, the viewing day and time, and the pages viewed. By visiting our website, you expressly consent to this data being collected for statistical purposes.

You have control over the data that you give us. When data is incomplete or incorrect, NEO LEGIA reserves the right to stop or suspend certain operations, temporarily or permanently.

Your personal data is intended to be used solely for internal purposes. Your personal data will therefore not be sold, given or forwarded to third parties, except with your prior consent. NEO LEGIA has taken all possible technical and organisational measures to avoid a data breach.

#### 5. We also use cookies!

Cookies may be placed on your computer's hard drive while you are visiting our website. We use cookies to provide our regular visitors with optimal user experience.

To find out more on the way we use cookies, please refer to our [Cookie Policy](#).

We advise you to enable cookies if you visit our website. However, you may easily disable them via your browser settings if you wish to do so. For more details, please read our [Cookie Policy](#).

## **6. What are my rights?**

### **6.1. The assurance of fair and lawful processing**

Your personal data is always processed in accordance with the legitimate purposes explained in point 4. It is collected and processed in an adequate, relevant and not excessive manner, and is not kept longer than what is necessary to achieve the purposes of the collection.

All technical and security measures have been taken to minimise the risk of illegal or unauthorised access to or processing of your personal data. Should the safety of its computer systems be breached, NEO LEGIA will immediately take all necessary steps to minimise the damage.

### **6.2. Right of access**

If you are able to prove your identity, you are entitled to obtain information about the processing of your data. Thus, you have the right to know the purposes of the processing, the categories of data concerned, the categories of data recipients, the criteria used to determine the data retention period, and your rights with regard to your data.

### **6.3. Right of rectification**

Inaccurate or incomplete personal data may be corrected. First and foremost, the User is responsible for making the necessary changes to his or her "user account" himself/herself, but you can also request it in writing.

### **6.4. Right to erasure (or "right to be forgotten")**

You also have the right to have your personal data deleted in the following cases:

- Your personal data is no longer necessary for the purposes;
- You withdraw your consent to the processing and there is no other legal basis for the processing;
- You have validly exercised your right to object;
- Your data has been subject to illegal processing;
- Your data must be deleted to comply with a legal obligation.

NEO LEGIA will determine on a case-by-case basis whether the above criteria apply.

## 6.5. Right to restrict processing

In certain cases, you have the right to request that the processing of your personal data be restricted, in particular in the event of a dispute as to the accuracy of the data, if your data has been processed unlawfully, if the data is necessary in the context of legal proceedings or to give NEO LEGIA enough time to verify that you can validly exercise your right to erasure.

## 6.6. Right to object

You also have the right to object to the processing of your personal data at any time. NEO LEGIA will stop processing your personal data, unless it can demonstrate that there are compelling legitimate grounds for processing which prevail over your right to object.

## 6.7. Right to data portability

You have the right to obtain any personal data that you have provided to us in a structured, commonly used and machine-readable format. At your request, this data can be transferred to another service provider, unless this is technically impossible.

## 6.8. Right to withdraw your consent

You may withdraw your consent to having your personal data processed at any time. Withdrawing your consent does not affect the validity of the processing operations prior to the withdrawal.

## 7. How can I exercise my rights?

To exercise your rights, you must send us a request by registered letter to NEO LEGIA, Avenue Jean Jaurès 50 or by e-mail at [privacy@neolegia.be](mailto:privacy@neolegia.be). We will reply as soon as possible, and no later than one (1) month after receiving the request.

## 8. Filing a complaint

If you are not satisfied with the way NEO LEGIA is processing your personal data, you have the right to lodge a complaint with the Belgian Privacy Protection Commission, which became the Data Protection Authority as of 25 May 2018 (<https://www.privacycommission.be/>).

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