

## Privacy Policy

Fairtual Technologies remains continuously committed to maximizing the privacy of its users and strives to provide a safe user experience for all. Our Privacy Policy contains everything you need to better understand how Fairtual collects and uses your data, and to understand your choices to protect your information.

The Privacy Policy contains our policy regarding the processing of personal data and explains our privacy practices and information. Our Privacy Policy is designed to inform you of our privacy practices in a clear, concise manner.

For any questions about your privacy, please contact us by sending an email to [info@virtualfair.be](mailto:info@virtualfair.be).

### Fairtual Privacy Policy

Capitalized terms are defined in the General Terms and Conditions and will have the same meaning in this Annexe as in the General Terms and Conditions.

Processing refers to any operation related to personal data based on which a natural person can be identified, either directly or indirectly; such as collecting, recording, organising, structuring, storing, updating, amending, retrieving, consulting, using, making available, aligning, combining, blocking, erasing, or destroying data.

This Privacy Policy aims to provide the persons involved in those processing operations with all the information required by the regulations in force, including the information required by the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 ("General Data Protection Regulation" or "GDPR").

Fairtual undertakes to process the personal data of Users in a legal, accurate, and transparent manner. In this privacy statement, Fairtual explains what personal data are processed and for what purposes, what rights the User has to protect his/her privacy and, if necessary, improve it.

### Definitions

The following terms are used in this Privacy Policy:

**The Website:** the website, which can be found at the following URL: <https://virtualfair.be>.

**the Regulation:** the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (also referred to as the "General Data Protection Regulation" or "GDPR")

**Personal data:** all information about an identified or identifiable natural person. For example: name, address, family composition, evaluations, certificates, etc.

**Processing:** (the whole of) the processing(s) of personal data. For example: storing, collecting, modifying, requesting, consulting, using, sending, disseminating, transmitting, deleting, destroying, etc.

**Controller:** the natural person, legal entity, public authority, department, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Data subject:** an identified or identifiable natural person to whom the processed data relate.

### To whom does this privacy policy apply?

This policy applies to the processing of the personal data of Website Users, specifically:

- persons visiting the Website;
- people who complete the contact form.

These persons will together be referred to as the "Data Subjects" and each individually as a "Data Subject".

### The Controller, the data protection officer, and the processor

- **The Controller:**

Fairtual Technologies BV, which registered offices are located at Koningin Elisabethlaan 18, 8000 Bruges, registered with the Crossroads Bank for Enterprises with number BE0899.916.411 (hereinafter: "Fairtual") is responsible for the processing of personal data performed in the course of its activities;

- **The Data Protection Officer:**

The data and privacy protection officer at Fairtual can be contacted using the following contact details:

- name: Mike Thevissen
- ph.: + 32 (0)472 75 66 22
- Email: mike.thevissen@whitewire.be

### The purpose of the processing

Fairtual processes personal data in relation to the use of its Website. Personal data are used for the following purposes:

- Contacts with Users that are companies or act in a professional capacity (customers or prospects): personal data is necessary for the proper creation and execution of the contract entered into with Fairtual. To conclude a contract, Fairtual must have the necessary personal data in order to be able to provide the agreed services;
- Suppliers with whom Fairtual communicates: the personal data are necessary for the correct preparation and performance of the agreement entered into with Fairtual;
- Any legitimate interest of the Controller;
- To be able to fulfil the request of the User completing the contact form (consent).

All the collected personal data are processed administratively and possibly for accounting purposes at a later time.

### What personal data are collected?

#### Directly collected information

- Information regarding the Data Subject: Name - First name
- Information used to contact the Data Subject: telephone number - email address

If the Data Subject introduces himself/herself through the Website (by completing the contact form), his/her data will be stored in the database. By registering and/or identifying himself/herself, the Data Subject gives express permission to be added to the database.

#### What the Data Subject communicates

If the Data Subject contacts Fairtual by telephone, Fairtual may record his/her identity (surname and first name) and phone number in order to create a contact record and to see who uses the service.

### Categories of processed personal data

- Identity information
- Contact information
- All data, documents, and media provided by the data subject to Fairtual

### Who receives the personal data?

The Controller may transfer the Personal Data of the Data Subject to the following recipients:

- ICT service providers;
- Accountant - bookkeeper;
- Subcontractors who are affiliated with the Controller, such as a designer or programmer.

As a rule, the Personal Data of the Data Subject will not be transferred to a country that is not part of the European Economic Area.

Fairtual will process this personal data in accordance with the purposes set out in the 'Data Processing' article. Only employees within the Fairtual organization who need these personal data in order to perform their job will be able to view it.

### How long will personal data be kept?

The Controller will store the Data Subject's Personal Data:

- As long as necessary to fulfil the purposes as described in the 'Data Processing' article;
- As long as necessary to delete the personal data after the retention periods set out in regulations have expired;
- As long as necessary to fulfil obligations arising from any statute, other regulations, or agreements entered into by Fairtual, or imposed by any government.

### What rights can the data subject exercise?

#### **Right to object**

If personal data are processed following the Data Subject's consent (refer to the 'Who does this policy apply to?' section), the Data Subject may withdraw this consent at any time.

If the Data Subject wishes to exercise one or more of the rights set out below, he/she should contact Fairtual's Data Protection Officer using the contact details set out in the 'The Controller and Data Protection Officer' section.

#### **Right of inspection**

The Data Subject has the right to obtain a conclusive answer from Fairtual as to whether or not personal data related to him/her are being processed and, if necessary, to access the personal data in question and to the following information:

- the purpose of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom personal data are disclosed;

- if possible, the period during which the personal data are expected to
- be stored, or, if this is not possible, the criteria for determining this period;
- that the Data Subject has the right to request Fairtual that personal data are
- erased or corrected, or that the processing is restricted;
- that the Data Subject has the right to lodge a complaint with the Data Protection Authority;
- all available information about the source of the data, in the event that the
- personal data are not collected from the Data Subject himself/herself;
- the existence, where applicable, of purely automated decision-making, including profiling, and, where appropriate, useful information about the underlying logic, significance, and expected consequences of the automated decision-making.

Fairtual will, upon the express request of the Data Subject, provide, within a reasonable period of time, a summary of the personal data and/or information requested above that is as complete as possible. The Data Subject has the right to obtain a copy of the requested information at no cost.

If the Data Subject submits his/her request electronically, Fairtual may provide the information by electronic means, such as email.

Fairtual guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can modify, correct, or delete these data at any time.

#### **Right of correction**

The Data Subject has the right to have incorrect, inappropriate, or outdated personal data removed or corrected. If the Data Subject believes that information stored by Fairtual is incomplete, incorrect, inappropriate, or out of date, he/she should contact Fairtual's Data Protection Officer using the contact details set out in Article 4.

Fairtual guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can modify, correct, or delete these data at any time.

#### **Right to erasure of data**

The Data Subject has the right to obtain the erasure of certain personal data when one of the following applies:

- the personal data are no longer necessary for the purposes for which they were collected or processed;
- the Data Subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;
- the Data Subject objects to the processing in accordance with this Policy;
- the personal data have been unlawfully processed;
- personal data must be deleted in order to comply with a legal obligation of Fairtual.

Fairtual is obliged to delete personal data without unreasonable delay when one of the above cases applies. Fairtual guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can modify, correct, or delete these data at any time.

#### **Right to restrict the processing**

In certain cases, the Data Subject has the right to obtain the restriction of the processing of his/her personal data. The following conditions must apply:

- If the personal data stored are incorrect, for the period necessary for Fairtual to verify and, if necessary, correct the accuracy of the personal data;

- the processing of personal data is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use;
- Fairtual no longer needs the data for the processing purposes for which the data were stored, but for the purposes of legal proceedings, for the protection of natural or legal persons, or for important reasons of general interest.

If the processing of personal data has been restricted, Fairtual may continue to store personal data but may not process personal data without the prior consent of the Data Subject.

Fairtual guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can modify, correct, or delete these data at any time.

### **Right to portability of personal data**

Subject to the rights and freedoms of third parties and to the limitations provided for in the Regulation, the Data Subject will have the right to obtain the personal data related to him/her that he/she has provided to Fairtual in a structured, commonly used, and machine-readable form.

The Data Subject has the right to transfer this data to another controller or to request that the personal data be transferred directly to another controller by Fairtual.

### **Refusal of automated processing and decision making**

The data processing and processes are not automated or without human intervention. Nevertheless, the Data Subject may object to the automated processing of his/her personal data if this processing affects him/her significantly.

The following exception applies here, which must be assessed on a case-by-case basis:

- the automated processing is authorised by a legal provision applicable to Fairtual, which also provides for the necessary measures to protect the rights, freedoms, and interests of the Data Subject.

The Data Subject also has the right to object to the processing of personal data related to him/her in the cases provided for by law or other regulatory texts.

The Data Subject may exercise these rights by submitting a request to or contacting the Data Protection Officer at Fairtual, as previously mentioned.

The Data Protection Officer will take the necessary measures to verify the identity of the Data Subject submitting a request.

The Data Subject also has the right to lodge a complaint with the supervisory authority. In Belgium, this is the Data Protection Authority (formerly the Commission for the Protection of Privacy), as of 25 May 2018. Visit: <https://www.gegevensbeschermingsautoriteit.be>.

### What security measures are being taken?

Since personal data are processed, Fairtual guarantees the confidentiality, integrity, and availability of this information at all times. Fairtual maintains a high level of security for the processing and storage of data.

The main principles applied by Fairtual are:

1. Definition of information security roles and responsibilities to ensure that all security activities are carried out.

2. All required documentation, such as policies, standards, procedures, and guidelines, are in place to support the security. That documentation will be reviewed regularly.
3. Fairtual uses a risk-based approach to identify necessary technical and other security controls. This ensures that the right priorities are set and that only efficient and effective security controls are selected and implemented.
4. Fairtual is committed to ensuring that employees across the organisation are aware of the importance of information security and data protection and incorporates this using regular training and exercises.
5. Fairtual has identity and access controls in place to protect information from unauthorized access, modification, or deletion, whether or not intentional.
6. Fairtual has implemented physical controls to ensure fire and theft prevention and access control for its buildings.
7. Cybersecurity controls have been installed. The applications and technology platforms have been designed, configured, maintained, and evaluated based on acknowledged security criteria, such as the ongoing monitoring of vulnerabilities and threats.
8. A Business Continuity program was installed to ensure continuity in the event of failures or disasters and to restore business processes. The information security principles remain in force during the activation of this program.
9. The information security policy and its implementation are assessed regularly.