

**PRIVACY STATEMENT
TILLEGHEM WEBSITE**

Who are we?

This is the privacy statement of Tillinvest BV, with company number 0682.793.985, and having its principal seat of business at Schoonzichtstraat 23E, 9051 Sint-Denijs-Westrem, Belgium (hereafter: “Tillinvest”, “we” or “us”).

In the current document, we describe how we process personal data in our capacity of data controller, in the context of our website and general activities. We may change this privacy statement from time to time. Please make sure to consult the most recent version of this Privacy Statement, each time you visit our website. If we make changes that significantly impact the processing of any of your personal data which is already in our possession, we will notify you about it via email.

We strive to process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**General Data Protection Regulation**” of “**GDPR**”).

If you have any questions or remarks on how we process your personal data, please contact us at: info@tilleghem.com.

How do we process your personal data?

We process the personal data described in the current section of this privacy statement. For each processing activity, we strive to explain why we process that data and will clarify the legal basis for the processing.

Activity	Personal data	Legal basis	Purpose
Contact pages and other communication	When you reach out to us, by means of contact pages on our website, by email, telephone or otherwise, we collect and process the information you thereby provide to us.		
	<ul style="list-style-type: none">• Identification details you provide in the context of the communication (e.g. name);• Contact details you provide in the context of your communication (e.g. address, e-mail, tel. number);• The communication itself (message/	<ul style="list-style-type: none">• Legitimate interest, to follow-up on your communication.	We process your data to reply to and follow-up on your question, complaint or other communication.

	<p>question/ request and any information therein);</p> <ul style="list-style-type: none"> • Metadata (e.g. date and time). 		
Direct Marketing	<p>We may use your data for direct marketing purposes (i) if you are (or your company is) a customer of us and/or if you have shown a specific interest in our products or services; or (ii) if you have provided your consent thereto (“opt-in”). You may unsubscribe at any time, by clicking the ‘unsubscribe’ button included at the bottom of each marketing email.</p>		
	<ul style="list-style-type: none"> • Identification data; • Contact details; • Purchase history and habits. 	<ul style="list-style-type: none"> • Consent; or • Legitimate interest, namely freedom of enterprise. 	<p>We use your personal data to inform you about our products, services and activities. Your purchase history may be used to tailor the communication to your profile.</p>
Cookies	<p>We may collect usage data about your interactions with our website. These data are assembled by means of cookies and similar technologies. For more information, please refer to our Cookie Policy.</p>		
	<ul style="list-style-type: none"> • IP-adres; • Cookies; • Connection moments and duration of your visit; • Activities (web pages you visit, clicks); • Browser and/or device. 	<ul style="list-style-type: none"> • Your consent; or • Our legitimate interest, namely our freedom of enterprise, for essential cookies. 	<p>We collect and process these data for the purpose of providing your a better usage experience, to optimize our website, and in the context of resolving technical problems. Some data may be used for online marketing purposes.</p>
Evidence and risk management	<p>In the event of an actual dispute or claim (including collection of debts), we may collect, use and preserve any data that was previously collected in the context of a different processing activity, to the extent it is considered useful to manage the concerned dispute and/or to anticipate on further escalation. We may also collect additional information from any relevant sources.</p>		
	<p>Potentially any sorts of data which we consider relevant for the purpose. In most cases:</p> <ul style="list-style-type: none"> • Identification and contact details (name, e-mail address); • Information about our service provision; • Personal characteristics (date of birth); 	<ul style="list-style-type: none"> • Legitimate interests, namely dispute and claim management, including the anticipation on claims and potential liability, by maintaining evidence of relevant activities. 	<p>Data is used for evidentiary purposes, in the context of claims management (including anticipating on potential disputes and claims).</p>

	<ul style="list-style-type: none"> • Acceptance or refusal of terms, confirmations, permissions; • Other actions that could be relevant for evidentiary purposes. 		
Client management	We process information about our customers and their personnel, for the purpose of onboarding them as customer and to provide them with the products and services they purchase.		
	<ul style="list-style-type: none"> • Identification data ; • Contact details; • Profession and organization; • Contractual terms; • Financial information (information about payments); • Purchase history and habits; • Information on the course of cooperation (deliveries, results of the services, evaluations, complaints, commercial gestures, etc.). 	<ul style="list-style-type: none"> • Most data is processed based on contractual necessity. • A history of the cooperation is kept based on our legitimate interests, namely freedom of enterprise. 	<ul style="list-style-type: none"> • To prepare, enter into and execute the cooperation; • To contact the client and data subjects involved; • To process and follow-up on payments; • To inform the client about our services and activities and to communicate with the client in general; • To keep a history on the cooperation with the client, e.g. regarding the type of products or services generally purchased, deliveries made, and potential complaints.
	We receive the information from yourself as data subject, or from the company for whom you operate.		
Supplier management	We process information about our suppliers and their personnel, for the purpose of onboarding them as a supplier, and to obtain the products or services we purchase from them.		
	<ul style="list-style-type: none"> • Identification data; • Contact details; • Profession and organization; • Personal characteristics (date of birth); • Information on the supplier's (or its personnel's) CV; • Work permits; • Contractual terms; 	<ul style="list-style-type: none"> • Most data is processed based on contractual necessity. • A history of the cooperation is kept based on our legitimate interests, namely freedom of enterprise • A profile of our suppliers is kept based on our legitimate interests, 	<ul style="list-style-type: none"> • To evaluate if the supplier (and/or its personnel) is suitable for the envisaged activities. • To prepare, enter into and execute the cooperation; • To contact the supplier and data subjects involved;

	<ul style="list-style-type: none"> • Emergency contacts; • Financial information (information about payments); • Information on the course of cooperation (deliveries, results of the services, evaluations, complaints, commercial gestures, etc.) 	namely freedom of enterprise.	<ul style="list-style-type: none"> • To process and follow-up on payments; • To assess the supplier relationship.
	We receive the information from yourself as data subject, or from the company for whom you operate. We may complete the information with data we obtain from freely accessible sources (e.g. your LinkedIn profile).		
Legal obligations	We process personal data where needed in the context of any legal obligation we may have (e.g. bookkeeping).		
	<ul style="list-style-type: none"> • The data that is relevant to comply with the legal obligation. 	Legal obligation	To comply with our legal obligations.

How long to we process your personal data?

We store and process your personal data during the term that is needed for the processing purposes set out herein. If there's no need to continue to process your personal data, we will remove de data from our systems, or anonymize is, so that you no longer are identifiable.

Activity	Retention term
Contact pages and other communication	Communication is stored in active databases for a period of 2 years, thereafter, data is archived for an additional period of up to ten (10) years.
Direct marketing	Up to 2 years from the last active contact.
Cookies	De storage term of cookies depends on the cookie concerned. Please refer to our Cookie Policy for more information.
Evidence and risk management	Data is generally preserved up until the relevant statutory prescription term of the concerned action, agreement or activity (usually 10 years).
Client management	Until 10 years from termination of the (contractual) relationship. Data may be further processed in the context of " <i>Evidence and risk management</i> ".

Supplier management	Until 10 years from termination of the (contractual) relationship. Data may be further processed in the context of “ <i>Evidence and risk management</i> ”.
Legal obligations	In accordance with the term of the legal obligation.

After the retention period has expired, the data is deleted from our active databases. Data may temporarily remain in backups, which are periodically overwritten so that the data is eventually permanently deleted/destroyed.

Who do we share your personal data with?

- We do not sell or otherwise commercialize your personal data.
- We may share your personal data with our payment partners, bailiffs or professional advisors such as lawyers or accountants, where relevant for their assistance.
- We may share your personal data with governmental instances, where we are required to do so.
- Furthermore, we appeal on several suppliers and service providers that may need certain data to provide their services to us (e.g. hosting providers or parties assisting us in securing or premises, etc.). These parties may process your personal data only in accordance with our instructions thereto.

We have implemented technical and organizational security measures, to avoid unlawful access to your personal data, and will disclose your personal data internally, based on the need to know of our personnel.

If personal data would be processed outside of the EEA, we will apply measures to ensure an adequate level of protection of your personal data, which is equivalent to the protection within the EEA.

Which rights to you have?

Pursuant to the terms of the GDPR, you have several right concerning the personal data we process about you. Please note that we try to clarify your rights in a simplified manner here. The execution of your rights may be subject to additional legal conditions.

Right to information and right of access

You have the right to obtain information from us about the processing of your personal data. You have the right to be informed about whether or not we are processing personal data about you and, if so, to access that personal data and any additional information about the processing we perform.

Right to rectification

If the personal data we hold is incorrect, you have the right to obtain rectification of the incorrect data without undue delay. Have you noticed an error in the data we hold? Please let us know, using the contact details below.

Right to erasure

You have the right to ask us to erase your personal data. We are obliged to comply with this request in each of the following situations:

- If we no longer need the data for the purposes for which it was collected or otherwise processed.
- If the data is processed on the basis of consent, you withdraw your consent, and there is no other legal basis for the processing.
- If you object to the processing on grounds relating to your specific situation and there are no overriding legitimate grounds for the processing.
- If you object to the processing of your data for direct marketing purposes.
- If we have processed your personal data unlawfully.
- If the personal data must be deleted to comply with a legal obligation to which we are subject.

Right to restriction of processing

In certain cases, you have the right to obtain restriction of processing of your data. For example, if you contest the accuracy of your personal data, during a period enabling us to verify the accuracy of the personal data.

Right of objection

You have the right to object to the processing of your personal data if you have serious and justified reasons for doing so. You also have the right to object to the use of your personal data for direct marketing. In this case, no specific reason is requested.

Right to data portability

If we process your personal data by automated means on the basis of your consent or contractual necessity, you will have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.

Right to withdraw consent

When the processing is based on your prior consent, you have the right to withdraw this consent for the future.

Automated decisions and profiling

You have the right to request not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

How to exercise your rights?

You may exercise your rights by contacting us:

- Email: info@tilleghem.com
- Regular mail:

Tillinvest BV
For the attention of the privacy department
Schoonzichtstraat 23E, 9051 Sint-Denijs-Westrem, Belgium

We can ask you to provide proof of your identify, e.g. by providing us a copy of the front of your identity card.

You have the right to lodge a complaint with the Belgian Data Protection Authority:

Data Protection Authority
Rue du Printing 35
1000 Brussels,
Tel +32 (0)2 274 48 00 - Fax +32 (0)2 274 48 35,
E-mail: contact@apd-gba.be

This is without prejudice to proceedings before the civil courts. If you have suffered damage as a result of the processing of your personal data, you can submit a claim for compensation.

How do we secure personal data?

We implement to the best of our ability adequate security measures designed according to the state of the art, to protect your personal data from unauthorized access, disclosure, use and modification.

Choice of law and jurisdiction

This privacy policy is governed by and construed in accordance with Belgian law. In case of disputes, only the courts of the legal district of Brussels capital (Dutch chambers), will be competent.
