

# PRIVACY POLICY

## 1. DATA CONTROLLER AND DATA PROTECTION OFFICER

1.1. In this Statement, Adria-Tec (hereinafter following: " Adria-Tec. Or" we ") explains how she handles your personal data as" controller "This privacy statement applies the processing by Adria-Tec of the personal data of customers, potential customers (prospects) and individuals who contract with we in any other way as a buyer or supplier.

Adria-Tec has a unit of establishment and can be contacted at the coordinates mentioned in point 7.4 of this charter

1.2. All information concerning an identified or identifiable natural person is personal data. This is information that can reasonably be related to an individual.

1.3. We have appointed a Data Protection Officer to manage our compliance with the RGPD. Our DPO can be reached at the following coordinates:

THEMIS-SECURITY

Street of the Abbey n ° 5

4040 Herstal (ZI Hauts Sarts)

Tel: +2 4 378 32 30

Mail: [info@themis-security.be](mailto:info@themis-security.be)

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## 2. THE PERSONAL DATA WE PROCESS

2.1. Adria-Tec can collect your personal data in many ways. We process personal data that you provide us when you enter into a contract with us, but also when you participate in an action or use our services.

### INFORMATION YOU PROVIDE US

2.2. If you submit a request to Adria-Tec, for example via the e-mail on our website, we need the following personal information:

- a) Surname, first name, phone, address, postal code

- b) E-mail address and other contact data;
- c) Possibly other information that is relevant to your request, such as: your activity, or other complementary options.

2.3. If you enter into a contract with Adria-Tec, we need, depending on the type of contract, product or service, the following personal information:

- a) Surname, first name, telephone, address, postal code;
- b) Contact data (phone number and email address);
- c) Number of business;
- d) financial data (bank account)
- e) Possibly other information that is relevant to your request, such as: your business, or other complementary options.

These personal data should be transmitted directly to Adria-Tec or its partner 's. If you do not provide us with "mandatory" information (which differs depending on the type of contract), we may not be able to provide the requested service and conclude the contract.

2.4. If you create an account on our intranet platform, we will need the following personal information:

- a) Surname, first name, telephone, address, postal code;
- b) Name of the company,
- c) Country
- d) Company number,
- e) Website,
- f) The creation of a login and a password

#### [INFORMATION ABOUT YOUR USE OF OUR SERVICES AND / OR PRODUCTS](#)

2.5. If you make use of the services offered by Adria-Tec or enter into a contract with us, we process the data such as:

- a) the data we link to certain profiles we draw from you based on your consumption behavior (for example: the frequency with which you visit our site, make a purchase or request a service);
  - b) navigation behavior, determined based on our own observations or cookies (see also Article 6 of this privacy statement);
  - c) the results of surveys of satisfaction customer;
  - d) data concerning your use of the services we offer.
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### 3. FOUNDATIONS AND LEGITIMATE INTERESTS

We treat personal data based on the following legal grounds:

- a) Consent
- b) Execution of a contract with you or pre-contractual measures
- c) Legal obligation
- d) Execution of a public interest mission
- e) Legitimate interest of Adria-Tec or a third party

We treat personal data in a legitimate interest when we use your data to provide services and related content, products and services, to communicate with you and for advertising or marketing purposes in connection with products or services that you have purchased in the past. Our legitimate interests include, for example : marketing and advertising related products or services that you have purchased in the past, communication, management and information security, research and analysis of our products or services, business management, affairs legal, internal management and sharing with our affiliates .

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### 4. THE PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

4.1. Adria-Tec processes personal data for the purposes (goals, objectives) mentioned below:

- a) maintain customer relationships (including maintaining a direct relationship between Adria-Tec, members of the Authorized Network, service partners and related financial service providers, including for the execution of a contract and the pursuit of legitimate interests).
- b) process and administer orders (including billing) to respond to your request and / or prepare or execute a contract;
- c) provide customer service, fulfill warranty obligations and those of authorized network members or service partners, handle complaints and requests, respond to your requests and perform contracts, or for legitimate interests;
- d) proactively contact customers in the event of hardware defects or malfunctions or to schedule service appointments, perform a contract or for legitimate interests;
- e) carry out or coordinate any recall actions, due to legitimate interests or legal obligations;

- f) conduct market research to improve our operations, our brands, our services and our products, and to identify the wishes of customers, due to legitimate interests;
  - g) provide a loyalty program for the performance of a contract and the pursuit of our legitimate interests;
  - h) the sending of informative and commercial messages by e-mail, postal mail or other communication channels. For direct marketing, you always have the option of unsubscribing by opting out or withdrawing your consent if you have given it.
  - i) advertising and marketing, including targeted advertising ("ads targeted interests ", such as through Facebook and Google) for connecting devices and analyze the impact of advertising and marketing activities due to our legitimate interests;
  - j) comply with legal obligations, resolve disputes and enforce our rights;
  - k) improve the quality of the data by means of postal code address and control, because of our legitimate interest;
  - l) link and analyze the cookies of our websites to customer data that we know. We do this to tailor the content of our communication as much as possible to your personal preferences, for the pursuit of our legitimate interests.
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## 5. 5. THIRD PARTIES INVOLVED IN THE TREATMENT

5.1. In some cases, Adria-Tec share personal data with third parties, which are "responsible treatment " independent. We explain below when and why. Adria-Tec can share data with:

- a) the service partners of Adria-Tec, for the performance of a contract or for the pursuit of legitimate interests.
- b) third parties to whom we are legally obliged or authorized to provide data.
- c) third, if we suspect a violation of third-party rights, criminal offenses or abuse they have a legitimate interest or whether they are public authorities. It may also be authorities such as the police, the public prosecutor;
- d) the other operational units of the Adria-Tec for the performance of a contract.
- e) the parties who assist Adria-Tec in its services and are not subcontractors of personal data for the pursuit of its legitimate interests.
- f) parties who assist Adria-Tec in the development of (direct) marketing activities in pursuit of its legitimate interests.

5.2. The communication of personal data to the third parties referred to above will take place only if it is authorized based on the applicable laws and regulations.

5.3. Adria-Tec also uses third-party services that act as " subcontractors " (for example, hosting service providers, certain software providers, mobility service providers or parties that organize or execute or investigations for Adria-Tec). With these providers, Adria-Tec is obliged to enter a subcontract which stipulates that they only process personal data in accordance with the instructions and under the control of Adria-Tec.

5.4. Currently, we do not store personal data outside the European Union. If personal data were to be deliberately disclosed outside the European Union, we will take additional safeguards, such as the conclusion of a model EU contract.

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## 6. 6. MARKETING, PROFILING AND COOKIES

6.1. Adria-Tec can also share your email address and phone number with Facebook so that Facebook can find out if you have a Facebook account and offer personalized Facebook ads via the Facebook Custom Audience service when you visit Facebook. We also use Google services to display personalized advertisements that are compiled on the basis of information you provide to the website or the application operator (for example when creating an account), your activities on this site or application (for example, pages visited, searches specified, clicks on ads) and demographics and data about your interests and focus. We do this for the pursuit of our legitimate interests. You may object at any time as described in Article 7 below.

6.2. Additionally, we and third parties automatically collect certain information about the history of your activities on our website internet and third-party applications using automated means, such as cookies, according to the preferences you provided. Through certain cookies and similar technologies, unique cookie IDs or other identifiers are assigned or collected. In this way, data can be collected while you are using the website or applications or when they are running in the background on your machine. We can combine them with other information about you or your machine, such as an IP address. If we need permission for this, we will ask you to do so before proceeding with this treatment.

6.3. We invite you to read our cookie statement for more information about cookies and similar technologies used and how to set your preferences.

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## 7. 7. YOUR RIGHTS, INCLUDING YOUR RIGHT TO OBJECT

7.1. You have the right to know what personal data we have stored about you and to whom we have disclosed your personal data.

7.2. In addition, you have the right to ask us, in compliance with applicable law, to correct, update, delete your personal data, limit the processing of your personal data or to give your personal data in a structured format, commonly used and machine readable for transmission to another company.

7.3. We are required to draw your attention to your absolute right to oppose direct marketing and your rights to oppose any treatment, including profiling, for the pursuit of the legitimate interests of Adria-Tec or third party and submit a complaint to a data protection authority. In Belgium, it is the Commission for the protection of privacy designated as the Data Protection Authority.

7.4. The rights of access, rectification, limitation of treatment, erasure, or portability of your data, as well as a withdrawal of agreement, can be exercised free of charge by e-mail, form, telephone or mail to following addresses or numbers;

E-MAIL [finances@adria-tec.com](mailto:finances@adria-tec.com)

Form via the website	<a href="http://www.adria-tec.com">www.adria-tec.com</a>
Phone	+32 2 367 12 29
Adres	Z.A. Saintes, Avenue Henri Zaman 1 1480 Tubize

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## 8. SECURITY

8.1. We have taken appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing.

8.2. If you feel that your data is not properly secured or if you have evidence of improper or improper use of your personal data, please contact our customer service at the email address mentioned in 7.4

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## 9. SHELF LIFE

We only store personal data for as long as is necessary for the purposes for which it was obtained, unless we are legally obliged to keep personal data for longer or if this appears necessary for the management of a potential dispute.

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## 10. MODIFICATION

10.1. We reserve the right to unilaterally modify or supplement this privacy statement. We will inform you as far as possible of any changes. We advise you to periodically review our privacy statement.

10.2. This privacy statement was last updated on October 21, 2019.

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## 11. CONTACT / QUESTIONS

11.1. For questions or comments concerning this privacy statement and / or the processing of personal data you can contact us at the addresses or numbers mentioned in point 7.4 above.