

PERSONAL DATA PROTECTION POLICY

The purpose of this Personal Data Protection Policy (hereinafter referred to as the "**Policy**") is to define the terms and conditions for the collection, use and sharing of personal data (hereinafter referred to as the "**Data**") that the Data Controller may collect in the context of the execution of the Services that it provides to users, whether or not they are customers (hereinafter referred to as the "**User**") in application of the GDPR .

IDENTITY OF THE DATA CONTROLLER

The GreenHouse Group BVBA/SPRL is responsible for the processing of your personal data. The GreenHouse Group BVBA/SPRL defines the use of your personal data.

The personal data collected by our subcontractors or service providers in the course of carrying out their services are processed by them in accordance with their own privacy policy.

The exchange of data between Greenhouse-Group bvba/sprl and these possible service providers, subcontractors, in the performance of the contractual services concluded with the Customers, is to be considered as a transfer of data between separate persons in charge, each of them being subject to the data protection obligations concerning their own processing of personal data.

Greenhouse-Group bvba/sprl does not act as a subcontractor or joint controller in this respect.

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DEFINITIONS

User: The person using the Site and services.

Personal Data

Personal Data is any information that directly or indirectly identifies a natural person.

Data controller

The Data Controller designates any person who determines the purposes and means of the processing of personal data.

Subcontractor

The Sub-Contractor, within the meaning of the GDPR, means any person who processes Personal Data on behalf of and on the instructions of a Data Controller. The Sub-contractor must be able to present sufficient guarantees regarding the implementation of technical and organisational measures to justify the protection of Personal Data.

Processing

Processing means any operation (or combination of operations) relating to Personal Data, by any process and in particular the collection, recording, organisation, storage, adaptation or modification, retrieval, consultation, use, communication by transmission, dissemination or any other form of making available, alignment or interconnection, as well as blocking, erasure or destruction.

Site

The Site refers to the website developed, opened and maintained by the Data Controller for the purpose of presenting the activity, offers, partners and any other useful professional communication at the address: www.greenhouse-group.com.

PERSONAL DATA COLLECTED

The mandatory or optional nature of the Personal Data requested and the possible consequences of a failure to respond by you are specified at the time of collection.

In general, we collect and process Personal Data that is strictly necessary for the correct execution of the services we offer or to meet our legal obligations, including :

- your contact details (surname, first name, position, address, telephone number, e-mail address)
- transaction history, orders, payment IP address
- bank details (within the framework provided by law.)
- data relating to professional life (CV, schooling, professional training, awards, etc.)
- machine identifiers when using our software, connection IP address, activity log
- the information collected via cookies, if applicable

If necessary, photos can also be taken.

Free consultation

Consultation of the Site does not require registration or prior identification. It can be carried out without you communicating any personal data relating to you. We do not collect or store any technical data about your device (IP address, Internet access provider, etc.).

Concerning any of your questions, we offer you the possibility of contacting us using the contact form provided on the Site. The following information must at least be provided: your e-mail address and your name so that we know who the message comes from and can reply to it. Other information is optional.

We automatically delete the personal data we collect when using the contact form once your request has been processed.

PURPOSES

Personal data shall be processed by the controller for the following purposes:

- The conclusion and execution of a contract with you (such as ordering products and/or services, carrying out training courses, coaching services, ...), as well as invoicing, follow-up and collection of invoices, through third parties or not;
- The continuous improvement, maintenance and optimisation of our products, services, websites and (mobile) applications and the securing of these, as well as the optimisation of the general, commercial and marketing strategies of the data controller;
- The personalisation of the products to be delivered and/or services to be provided to you and the corresponding support services, usage information, maintenance messages or other related (electronic) messages;

- The targeted sending of advertisements, newsletters and information tailored to your needs.

PERIOD OF STORAGE

We store your Personal Data to the extent necessary to fulfill the purposes for which it was collected. We also store your Personal Data for the retention period provided for by law, especially in civil and commercial matters.

The data necessary for commercial prospecting, i.e. surname, first name, postal address, e-mail address and telephone numbers are kept for a period of three years from the end of the commercial relationship. If you are a prospect, your data is kept for a maximum of 3 years from the date of collection or the last contact.

Data retention for the duration of the contractual relationship

Personal data undergoing data treatment shall not be kept longer than is necessary for the fulfilment of the obligations defined at the time of conclusion of the contract or the predefined duration of the contractual relationship.

Deletion of data after account deletion

Means of erasing data are implemented in order to provide for their effective deletion once the retention or archiving period necessary for the fulfilment of the determined or imposed purposes has been reached.

RIGHTS CONCERNING THE DATA COLLECTED

You have the following rights:

- the right of access to your Personal Data (article 15 of the GDPR) ;
- the right to rectify your Personal Data if they are inaccurate (article 16 of the GDPR);
- the right to the deletion of your Personal Data (article 17 of the GDPR) in certain cases;
- the right to a limitation of the Processing of your Personal Data (article 18 of the GDPR) and right to the portability of your Data (article 20 of the GDPR), within the limits set by the applicable regulations;
- the right to withdraw your consent at any time when the Processing is based on it (Article 13 of the GDPR);
- the right to object to the Processing of your Personal Data (Article 21 of the GDPR);
- the right to define the guidelines for the fate of your Personal Data after your death. In the absence of the latter, your heirs may exercise their right over your Personal Data.

These rights can be exercised by providing proof of your identity and by contacting the Data Controller at the following e-mail address: gdpr@greenhouse-group.com.

No later than one month after we receive your completed and properly returned application, we will inform you in writing of the outcome of your application. Depending on the difficulty of your application or the number of applications we receive from others, this deadline may be extended by two months. In this case, we will notify you of this extension within one month of receiving your form.

In certain cases (e.g. legal obligations, rights of other persons, limitation periods, ...), you will not be able to exercise your rights, in whole or in part. You will then be informed of this as well as the reasons why we cannot fully satisfy your request.

DATA TRANSFER

Your Personal Data are neither sold nor rented to third parties.

The Data Controller undertakes to maintain the confidentiality of the Personal Data and not to disclose them, in any form whatsoever, for any purpose other than those indicated below:

- if you have given us your explicit consent (art. 6 paragraph 1 sentence 1 point a of the GDPR),
- if this is necessary for the performance of the contractual relationship concluded with you (Art. 6 paragraph 1 point b of the GDPR),
- if we are obliged by law to communicate them (art. 6 paragraph 1 point c of the GDPR),
- if such disclosure is necessary for the purpose of asserting, exercising or defending rights and one is not entitled to assume that you then have an overriding legitimate interest in the non-disclosure of your data (Art. 6 para. 1 sentence 1 point f of the GDPR).

In these cases, however, the volume and quality of the data transmitted is limited to the strict minimum necessary.

We use services provided by specialised companies, in particular our subcontractors, a list of which can be provided to you by contacting our GDPR Process Manager. When these companies use servers outside the EU or located in countries that do not have an adequate level of protection as required by the GDPR, we have ensured to enter into contracts with them assuring the protection of personal data and in particular the standard clauses of the European Commission governing the transfer of personal data.

The required agreements are always concluded with these partners, suppliers or other agents in order to limit the use and processing of your personal data and to guarantee sufficient protection of your personal data.

Subject to the stipulations mentioned above, the Data Controller undertakes not to transfer the personal data of its Users outside the European Union or outside the countries benefiting from an adequate level of protection in application of the GDPR.

Information of the User in the event of a security breach

We undertake to implement all appropriate technical and organisational measures in order to guarantee a level of security corresponding to the risks of accidental, unauthorised or illegal access, disclosure, alteration, loss or destruction of your personal data. In the event that we become aware of illegal access to your personal data stored on our servers or those of our service providers, or unauthorized access resulting in the realization of the risks identified above, we undertake to :

- Notify you of the incident as soon as possible;
- Examine the causes of the incident and inform you;
- Take the necessary measures within the limits of reasonableness in order to reduce the negative effects and prejudices that may result from the said incident.

Limitation of liability

Under no circumstances can the commitments defined in the above clause relating to notification in the event of a security breach be assimilated to any admission of fault or liability for the occurrence of the incident in question.

MODIFICATIONS

We may make corrections, additions or changes to this data protection and privacy statement at any time for various reasons. The most current version can always be consulted on our websites.

DO YOU HAVE ANY QUESTIONS, COMPLAINTS AND/OR DATA LEAKS TO NOTIFY US?

We remain at your disposal for any questions, remarks or complaints you may have concerning the protection of your personal data. We invite you to contact our GDPR Process Manager at the following e-mail address:

pl.jeandin@greenhouse-group.com

The GreenHouse Group SPRL/BVBA
Mr Laurent Jeandin
Rue de la Montagne 54/56 (B3)
1000 Brussels
Tel : 0032 (0)2 540 8133

You also have the right to lodge a complaint with the Data Protection Authority (DPA) at the following address: rue de la Presse 35 - 1000 Brussels or via their website: <https://www.autoriteprotectiondonnees.be/>

If you are aware of or suspect a data leakage, we ask you to report it immediately to us at gdpr@greenhouse-group.com