



PRIVACY POLICY

(version 22/08/2022)

Your privacy is important to us.

All personal data that we obtain about you will be collected and processed in accordance with applicable data protection legislation, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 (“**GDPR**”), as well as this privacy policy.

This privacy policy provides more information about the personal data that we process, why we process it, how we obtain the data, how long we retain the data and with whom we share it. It also provides more information on how you can exercise your rights.

1. IDENTITY AND CONTACT DETAILS.....	1
2. PURPOSES	1
3. SECURITY	7
4. RIGHTS.....	7
5. UPDATES	8

1. **IDENTITY AND CONTACT DETAILS**

The data controller for your personal data is the following legal entity (separately or jointly with the lawyers mentioned on our websites www.faros.eu):

Faros - competition & data protection BV

Grensstraat 7

B-1831 Machelen

Belgium

Enterprise number: 0788.247.833

If you have any questions about the processing of your personal data, you can always contact us:

- via post: to the abovementioned address (attn. Privacy)
- via e-mail: privacy@faros.eu
- via phone: 02/580.18.14

2. **PURPOSES**

We process your personal data for one or more of the following purposes:

- Client management
- Recruitment

- Newsletters and other communications
- Events
- Contact and information
- Website
- B2B management
- Accounting
- Litigation management

Below, you can find for each purpose the personal data that we process, why we process it, how we obtain the data, how long we retain the data and with whom we share it.

1) Client management

When providing our legal services to clients, we may process your personal identification data (name, (company) address, email address, telephone number) as well as all other information that is provided to us or is relevant when providing legal advice or handling a case for a client. We will not collect any sensitive data or criminal data unless that is necessary for the legal advice or case.

This personal data allows us to provide our legal services to clients, which includes legal advice, draw up legal deeds and documents, represent clients in court, in an arbitration or before administrative or similar bodies, provide assistance in negotiations and/or the conclusion of contracts, provide clients with assistance in mediation, police or similar interrogations, take on various mandates (curator, debt mediator, administrator, etc.), offer legal training, etc.

The legal basis for this processing is the conclusion and execution of an agreement for the provision of legal services with you as a client (Art. 6, §1, (b) GDPR) or, in case you are a contact person of a professional client or a third party (adversary, witness, etc), our legitimate interest to provide our legal services to clients (Art. 6, §1, (f) GDPR).

Compliance with the legal obligation as set out in the Law of 18 September 2017 on the prevention of money laundering and the financing of terrorism and on restricting the use of cash may also require us to process this personal data from you (Art. 6, §1, (c) GDPR).

We obtain this personal data directly from you or via third parties.

For the provision of our legal services, we may store your personal data for up to 5 years plus a verification period of 1 year after the closing of the relevant case.

We only share your personal data with third parties on a need-to-know basis, including public authorities and judicial authorities (courts and tribunals, bailiffs, public prosecutor's office and police authorities), (lawyer(s) of) adversaries and banking and insurance institutions. As a result of a judicial decision, we may also be obliged to share your personal data with a technical adviser,

expert, judicial mandatary (i.e. notary, judicial administrator) who has been legally appointed. Our IT providers also have access to your personal data.

2) Recruitment

When you apply for a position at Faros, we process your personal identification data (name, address, email address, telephone number) as well as all other information provided to us in your resume or during the recruitment process (including during interviews).

This personal data allows us to fill in our current vacancies (including by conducting reference checks) and maintain a database of potential candidates for future vacancies.

The legal basis for this processing is the conclusion of an employment agreement with you (Art. 6, §1, (b) GDPR). In case we conduct reference checks or want to include you in our talents database for future vacancies, we will ask for your consent (Art. 6, §1, (a) GDPR).

We obtain this personal data directly from you or via recruitment agencies.

For recruitment purposes, we store your personal data for up to 1 year plus a verification period of 6 months after withholding or rejecting your application. When you have given your consent, we will keep you in our talents database for a period of 5 years. You can of course withdraw your consent at any time (for more information, see [RIGHTS](#)).

We may share your personal data with recruitment agencies. Our IT providers also have access to your personal data.

3) Newsletters and other communications

For our newsletters and other communications, we may process your personal identification data (name, (company) address, e-mail address), personal characteristics (gender, language) and education or employment data (position, company). We may also receive information about your interaction with our newsletters.

This data allows us to keep you informed of legal developments, inform you about our products, services and events and provide you with our Christmas card.

The legal basis for this processing is the legitimate interest to promote our products, services and events to our clients (Art. 6, §1, (f) GDPR). If you subscribe to our newsletters 'In the Picture' and/or 'Privacy Talk' via the website, you will receive these newsletters because you have given your consent (Art. 6, §1, (a) GDPR).

We obtain this personal data directly from you.

We will send you our newsletters and other communications until you unsubscribe to our newsletters and other communications, which you are free to do at any time (for more information, see RIGHTS).

Our suppliers of marketing tools and IT providers also have access to your personal data.

4) Events

For the organisation of events such as seminars and workshops, we may process your personal identification data (name, (company) address, e-mail address, telephone number), identification data issued by public authorities (VAT number), education or employment data (function, company), memberships (IBJ, OVB), financial data (bank account number, payment method) and your image. When you participate in a webinar, we also process information about your viewing behaviour.

This data allows us to register your participation, provide you with the necessary information about the event and organise the award of IBJ or OVB points for your participation in the event. The images taken during an event allow us to communicate about the event via our website and social media.

The legal basis for this processing of personal data is the conclusion and execution of an agreement with you as a participant in the event (Art. 6, §1, (b) GDPR). If we take targeted images of you during the event and want to share them on our website and social media, we will ask for your consent (Art. 6, §1, (a) GDPR).

We obtain this personal data directly from you or through a third party (e.g. a third party who registers you for an event).

We keep your personal data for 10 years plus a verification period of 1 year after your participation in the event.

Our IT providers also have access to your personal data.

5) Contact and information

If you make use of the contact form on our website, we process your personal identification data (name, email address) and any possible additional information that you provide to us.

This data allows us to follow-up on your contact via our website, i.e. to get in touch with you, provide you with information that you may have requested via our website, etc.

The legal basis for this processing is the consent that you have given by submitting to us your personal data for the above mentioned purposes (Art. 6, §1, (a) GDPR).

We obtain this personal data directly from you.

For the above mentioned purpose, we store your personal data for 10 years after having followed-up on your contact plus a verification period of 1 year.

We only share this personal data with third parties with whom we work together for our website (IT and software providers).

6) Website optimisation and website security

When you visit our websites www.faros.eu or www.faros-compliance.eu, we process your personal identification data (IP address and cookies).

This data allows us to improve your browsing experience on our website, to better tailor the website to your preferences and to secure our website against spam.

The legal basis for placing essential and functional cookies is our legitimate interest to provide a well-functioning and user-friendly website (Art. 6, §1, (f) GDPR). Analytical, advertising and social media cookies will only be placed if you have given your consent (for more information, see our **Cookie statement**).

We obtain this personal data directly from you.

The expiration date varies per cookie and you can change your cookie preferences at any time (for more information, see our **Cookie statement**).

We only share this personal data with IT and software providers with whom we cooperate for our website. The providers of third party cookies may also have access to your personal data.

7) B2B management

As a supplier or business partner of Faros, we may process your personal identification data (name, (company) address, email address, telephone number), identification data issued by public authorities (enterprise number, VAT number), as well as all other information that is provided to us or is relevant in the context of our collaboration.

This data allows us to conclude agreements with suppliers and business partners (including comparing suppliers, requesting quotes and conducting pre-contractual negotiations), communicate with suppliers and business partners, manage orders and organise payments.

The legal basis for this processing is the conclusion and execution of an agreement for the provision of goods or services with you (Art. 6, §1, (b) GDPR) or, in case you are a contact person of a

professional supplier or business partner, our legitimate interest to organise our B2B management (Art. 6, §1, (f) GDPR).

We obtain this personal data directly from you.

For our B2B management, we store your personal data for up to 10 years plus a verification period of 1 year after the end of the agreement.

We only share this personal data with third parties on a need to know basis, including public authorities. In addition, our IT providers also have access to this personal data.

8) Accounting

For accountancy purposes, we may process your personal identification data (name, (company) address, email address, telephone number), identification data issued by public authorities (enterprise number, VAT number), financial data (bank account number, manner of payment) and an overview of supplied services.

This data allows us to keep our accounts and comply with accounting obligations (including the preparation of the annual accounts) and invoice our products, services and events.

The legal basis for this processing is the various legal obligations as set out in the Belgian Code of Economic Law, the Belgian Code of Companies and Associations and its Royal Decree and the Belgian Income Tax Code (Art. 6, §1, (c) GDPR).

We obtain this personal data directly from you.

For accountancy purposes, we store your personal data for up to 7 years plus a verification period of 1 year after the relevant financial year.

We only share this personal data with third parties on a need to know basis, including public authorities, social security authorities, banking and insurance companies and our accounting firm. In addition, our IT providers also have access to this personal data.

9) Litigation management

In case of a (potential) litigation, we may process your personal identification data (name, (company) address, email address, telephone number) and any other information that is relevant to the (potential) litigation.

This data allows us to defend our legitimate interests in all forms of dispute resolution.

The legal basis for this processing is the legitimate interest to exercise our (contractual, extra-contractual, legal and other) rights of defense (Art. 6, §1, (f) GDPR).

We obtain this personal data directly from you or via third parties.

For our litigation management, we store your personal data for up to 5 years plus a verification period of 1 year after the expiry of the period for appeal at last instance.

We only share this personal data with third parties on a need to know basis, including public authorities and judicial authorities (i.e. courts and tribunals, bailiffs, public prosecutor's office and police authorities), banking and insurance institutions, our accounting firm, external legal counsel and debt collection firms. Our IT providers also have access to this personal data.

3. SECURITY

We have implemented appropriate technical and organizational measures to ensure the confidentiality of your personal data and to protect your data from accidental and unlawful destruction, loss, alteration, unauthorized disclosure and access.

We have made the necessary contractual arrangements with the third parties with whom we work together and will not transfer your personal data outside the European Economic Area without ensuring that your data is granted an equivalent level of protection there.

4. RIGHTS

You can always contact us to exercise the following rights:

- the right to access or rectification of your personal data
- the right to erasure of your personal data
- the right to restrict the processing of your personal data
- the right to withdraw your consent
- the right to object to the processing of your data
- the right to transmit your data to another service provider
- a complaint if you believe that we are not acting in accordance with applicable data protection laws. You can also submit a complaint to the Belgian Data Protection Authority.

You can reach us via one of the following channels:

- via post: to the abovementioned address (attn. Privacy)
- via e-mail: privacy@faros.eu
- via phone: 02/580.18.14

We respect all rights relating to your personal data to which you are entitled under applicable law.

If you no longer wish to receive our newsletters and wish to stop the processing of your data for that purpose, you can always use the unsubscribe link provided at the bottom of each newsletter. Once you unsubscribe from the newsletter, you will no longer receive it. You can always resubscribe via our website. You can also access or rectify your personal data by using the “update preferences” option at the bottom of the newsletter.

For those processing activities for which the legal basis is a legitimate interest, you can ask us more information about the balancing test that we have carried out in that context (for more information, see PURPOSES).

For identification purposes, we may ask you for further information or a copy of the front side of your identity card.

5. UPDATES

This privacy policy may be amended from time to time, within the limits of the applicable data protection laws. Via our website you always have access to the most recent version.