

PRIVACY POLICY

1. WHO WE ARE

“We”, “us” or “our” means Elevate-IT Ltd, with its registered office at 2550 Kontich, Veldkant 35C and with company number 0708.925.983. We act as controller for the personal data we gather through your use of our website.

This Privacy Policy is solely intended to provide you with information in relation to the processing of personal data through your use of the website. For our privacy practices in relation to our services, we refer you to the agreement as may be concluded between us.

Your privacy is important to us, so we’ve developed this Privacy Policy that sets out how we collect, disclose, transfer and use (“process”) the personal data that you share with us, and which rights you have. Please take a moment to read through this policy.

If you have any questions, concerns or complaints regarding this Privacy Policy or our processing of your personal data or you wish to submit a request to exercise your rights as set out in article 4, you can contact us:

- (a) Via-mail: to info@elevate-it.be;
- (b) By post: to Veldkant 35C, 2550 Kontich, Belgium.

This Privacy Policy was revised last on 27/01/2021.

2. HOW WE USE AND COLLECT YOUR PERSONAL DATA

Personal data is defined as any information relating to an identified or identifiable natural person. Identifiable refers to identifiers (such as name, identification number, location data, etc.), that can be used to directly or indirectly identify a natural person.

The personal data we collect, is collected and used for the purposes as listed hereunder:

- a. In the event you use the contact form on our website, we will use your personal data in order to reply to your query, via e-mail or telephone.
- b. We process your data for the management of our customer base.
- c. We process your data for the purpose of recruiting and the processing of applications.
- d. In the event you register for our newsletter, your e-mail address will be used in order to send you our newsletters, which may include invites to events, seminars, etc. organized by us.
- e. We process your personal data for the purpose of supporting the website and enhancing your user experience, which includes ensuring the security, availability, performance, capacity and health of the website.
- f. We process your personal data to enforce or exercise any rights that are available to us based on the applicable law, such as use for the establishment, exercise or defense of legal claims.
- g. We may also use your personal data to fulfil our obligations as set out by the applicable law.

The following categories of personal data can be distinguished:

- a. **Contact data:** in the event you make use of the contact form, you will be asked to provide the following information: name, address, e-mail address, phone number, and any personal data that you choose to put in the designated blank field (please do not provide us with any sensitive information, such as health information, information pertaining to criminal convictions, or credit card/account numbers). This is information that is provided directly by you.
- b. **Education and Profession data:** contact details, personal characteristics such as age, date of birth, gender, professional experience, education.
- c. **Newsletter:** If you register for our newsletter, you will be asked to provide your e-mail address. This is information provided directly by you
- d. **Usage data:** We collect personal data regarding your activities on our website: IP address, device ID and type, referral source, language settings, browser type, operating system, geographical location, length of visit, page views, or information about the timing, frequency and pattern of your service use. This information may be aggregated and used to help us provide more useful information regarding the use of our website. In the event the usage data is completely anonymized (and can therefore not be traced back to you as an individual), this will not be considered personal data for the purpose of this Privacy Policy. This is personal data that is automatically collected through your use of the website.

The legal basis for the processing of your personal data is.

- a) Contractual ground, art. 6, (1), b) GDPR: the processing is necessary for the performance of the agreed agreements in the employment contract.
- b) Consent, art. 6, (1), a) GDPR. We have received this unambiguous and explicit consent. You have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that took place before the withdrawal of your consent
- c) Legitimate interest, art. 6, (1), f) GDPR: the processing is necessary for the defense of legitimate interests, i.e. supporting our website and improving user-friendliness.

In the event the legal basis for the processing of your personal data is consent, you will, at all times, have the right to withdraw your consent. This will, however, not affect the lawfulness of any processing done prior to the withdrawal of consent.

In the event the legal basis for processing is our legitimate interests the public interest, you will have the right to object to such processing, as set out in article 0 of this Privacy Policy.

Your personal data will solely be used for the purposes as set out in this article.

3. RETENTION OF YOUR DATA AND DELETION

Your personal data will not be kept longer than necessary to achieve the purposes for which they were collected.

- (a) If you use the contact form on our website, your personal data will be kept for 3 years after the last contact;
- (b) Data for the management of our customer database is kept for 7 years after the end of the agreement or 3 years if no agreement has been concluded;

- (c) Data for the purpose of recruiting and processing applications is kept for 3 to 5 years;
- (d) Personal data that is processed for the purpose of supporting the website and improving your user experience on the website are kept in accordance with the retention periods that you can find in our Cookie Policy;
- (e) However, we are entitled to keep your personal data if this is necessary to comply with our legal obligations, to establish a legal claim or to defend ourselves against such claim or for evidence.

In the event you withdraw your consent or you object to our use of your personal data, and such objection is successful, we will remove your personal data from our databases. Please note that we will retain the personal data necessary to ensure your preferences are respected in the future.

The foregoing will, however, not prevent us from retaining any personal data if this is necessary to comply with our legal obligations, in order to file a legal claim or defend ourselves against a legal claim, or for evidential purposes.

When the retention of the personal data is no longer required, we will destroy or delete it in a secure manner, or make it available to you.

4. YOUR RIGHTS

This article lists your principal rights under data protection law. We have tried to summarize them for you in a clear and legible way.

To exercise any of your rights, please send us a written request in accordance with article 1 of this Privacy Policy. We will respond to your request without undue delay, but in any event within one month of the receipt of the request. In the event of an extension of the term to respond or in the event we do not take action on your request, we will notify you.

The right to access

You have the right to confirmation as to whether or not we process your personal data and, in the event we do so, you have the right to access such personal data, together with certain additional information that you also find listed in this Privacy Policy.

You have the right to receive from us a copy of your personal data we have in our possession, provided that this does not adversely affect the rights and freedoms of others. The first copy will be provided free of charge, but we reserve the right to charge a reasonable fee if you request further copies.

The right to rectification

If the personal data we hold about you is inaccurate or incomplete, you have the right to have this information rectified or, taking into account the purposes of the processing, completed.

The right to erasure (right to be forgotten)

In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- (a) The personal data are no longer needed in relation to the purposes for which they were collected or otherwise processed;
- (b) You withdraw your consent, and no other lawful ground exists;
- (c) The processing is for direct marketing purposes;

- (d) The personal data have been unlawfully processed; or,
- (e) Erasure is necessary for compliance with EU law or Belgian law.

There are certain exclusions to the right to erasure. Those exclusions include where processing is necessary,

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation; or,
- (c) for the establishment, exercise or defense of legal claims.

The right to restrict processing;

You have the right to restrict the processing of your personal data (meaning that the personal data may only be stored by us and may only be used for limited purposes), if:

- (a) You contest the accuracy of the personal data (and only for as long as it takes to verify that accuracy);
- (b) The processing is unlawful and you request restriction (as opposed to exercising the right to erasure);
- (c) We no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; or,
- (d) You have objected to processing, pending the verification of that objection.

In addition to our right to store your personal data, we may still otherwise process it but only:

- (a) with your consent;
- (b) for the establishment, exercise or defense of legal claims;
- (c) for the protection of the rights of another natural or legal person; or,
- (d) for reasons of important public interest.

We will inform you before we lift the restriction of processing.

The right to data portability

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

You also have the right to have your personal data transferred directly to another company, if this is technically possible, and/or to store your personal data for further personal use on a private device.

The right to object to processing

You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- (a) The performance of a task carried out in the public interest or in the exercise of any official authority vested in us;
- (b) The purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

The right to complain to a supervisory authority

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. In Belgium, you can submit a complaint to the Authority for the protection of personal data (Data Protection Authority), Drukpersstraat 35, 1000 Brussel (contact@apd-gba.be).

5. PROVIDING YOUR PERSONAL DATA TO OTHERS

If you are a customer of ours, we may pass on your personal data to suppliers with whom we have contracted to offer you services. If you are a supplier to us, we may pass on your personal data to our customers to contact you.

We can also pass on your personal data to other entities within the Cronos Group.

We may also disclose your personal data in the event such disclosure is required or necessary in order to fulfil a legal obligation. We may also disclose personal data in order to protect your vital interests or the vital interest of another natural person.

We do make use of a social media plugin to direct you to our social media channels and to allow you to interact with our content. This social media channel is LinkedIn. In the event you click such link, such social media service provider may collect personal data about you and may link this information to your existing profile on such social media.

We are not responsible for the use of your personal data by such social media service provider. In such case, the social media service provider will act as controller. For your information only, we have included the relevant links (these may be changed from time to time by the relevant service provider):

- (a) LinkedIn: <http://linkedin.com/legal/privacy-policy>;

6. INTERNATIONAL TRANSFERS

We try to limit the transfer and processing of personal data to countries within the European Economic Area or to countries that guarantee an adequate level of protection, equivalent to the level guaranteed under the GDPR and this privacy policy. In the event of processing outside the borders of the European Economic Area, we will provide you with further explanation upon written request.

7. COOKIES

Our website makes use of cookies. For further information relating to our use of cookies, we refer you to our Cookie Policy.

8. AMENDMENTS TO THE PRIVACY POLICY

From time to time, we have the right to modify this Privacy Policy. You will always be able to consult the most recent version of the Privacy Policy on the website