

PRIVACY POLICY

S.A SMSH

Date of creation: 25 May 2018

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S.A SMSH (hereinafter, '**SMSH** or "**We**") makes it a point of honour to respect the privacy of the individuals whose personal data we process (hereinafter, '**You**') and to process such data in the strictest confidence and in accordance with the legislation in force, in particular:

- 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 (hereinafter, the '**GDPR**');
- the Belgian law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

This privacy policy (hereinafter the '**Privacy Policy**') is intended to inform you, in a transparent manner, about the data we collect, the purpose of its collection, how we use it and your rights regarding the processing of your personal data.

1. Who is responsible for processing your data?

SMSH SA is responsible for processing your personal data.

S.A SMSH

134, Rue de Coquelet
5000 Bouge-Namur
Belgium
+32 (0)81 20 83 97
BCE: 697.888.769

Any questions or requests regarding the processing of this data can be sent to the following address:
privacy@sms-agency.com

2. What data do we collect?

The personal data we hold is that which you have provided to us for the purposes listed in point 3. This includes the following categories of data:

- **Data relating to your identity:** title, surname, first name, date of birth, nationality, national registration number, image;
- **Contact details:** address, telephone number, email address;
- **Data relating to your browsing on our website:** IP address, connection data, browser type, platform and/or operating system used. Information relating to 'Cookies' is included in the Cookie Policy;
- **Data relating to communications** between you and SMSH;

- **Any other data that you have agreed to provide to us**, depending on your preferences or the services used, in particular in the context of forms or specific interactions with our teams.

(hereinafter referred to as '**Data**')

3. Why do we collect your data?

We process your data for various purposes. For each type of processing, only data relevant to the pursuit of the purpose concerned is processed.

We therefore collect and process your data for the following purposes:

- To manage our relationship with you in connection with the implementation and performance of contracts, to respond to your requests for information, to provide our services, etc.;
- To promote our offers and services through our website, newsletters, etc.;
- Evaluating the effectiveness and user-friendliness of our website and improving it;
- Organising events in which you participate;
- Managing complaints and disputes and protecting our interests.

Photos and videos may be taken and used for promotional purposes and shared on social media on behalf of SMSH during events. If you do not wish to be photographed or filmed for the above purposes, please inform the photographer at the event. You can also exercise your rights (see point 5) by sending an email to privacy@sms-agency.com

4. How do we justify collecting your data?

The legal basis for processing your personal data is based on:

- **Your consent**, particularly with regard to cookies on our website and when you subscribe to a SMSH promotional service. If the legal basis for our processing is based on your consent, you have the right to withdraw it at any time.

In the context of direct marketing, this means that you can unsubscribe from our newsletters or other commercial communications at any time. You will then be placed on an 'opt-out' list. To unsubscribe, simply send us an email at the following address: privacy@sms-agency.com, or click on the unsubscribe link included in every email we send you.

- **a legal obligation imposed on the data controller:** We need to collect and store some of your data in order to comply with various legal obligations, particularly tax and accounting obligations;
- **performance of the contract:** The collection and processing of some of your data is necessary to perform the contract We have entered into with you or to take pre-contractual measures at your request (e.g. to process an order, provide you with a service or respond to a specific request);

- **our legitimate interest**, in particular to ensure the proper functioning of our website, respond to your requests, manage and improve our relationship with you. In any event, we strive to maintain a proportionate balance between our legitimate interest and respect for your privacy.

5. What are your rights?

We wish to inform you that, in connection with the processing of your Data, you have the right:

- To obtain confirmation that we are processing your Data and to request a copy of this Data at any time and free of charge. In this context, we may ask you for proof of identification before granting your request.
- Request that We update Your Data or correct any Data that You consider to be inaccurate or incomplete.
- Request that We erase Your Data or restrict the way in which We use it if You consider that there is no or no longer a legal basis for its processing.
- Withdraw your consent to the processing of your Data (to the extent that the processing is based on your consent).
- Receive a copy of the Data you have provided to us in a structured, commonly used and readable format and transmit this Data to another party (another data controller, to the extent that the processing is based on consent or a contract).
- To object to the processing of Your Data for which we use legitimate interest as the legal basis. In such cases, we will stop processing unless we have legitimate and compelling reasons for doing so.

6. How long do we keep your data?

We keep your Data for as long as necessary to fulfil the purposes for which it was collected. Retention periods may vary from one processing operation to another, depending on the purpose pursued and the legal basis justifying these retention periods.

7. Security of your data

We make every effort to protect your data in the best possible way. These measures include, in particular, informing staff of their confidentiality obligations and technical security measures (protection of our CRM, etc.).

8. Is your data shared with third parties?

SMSH considers personal data to be confidential information. However, in the course of its business and in order to achieve the purposes described above, SMSH may share your personal data with the following entities:

- Other companies in the group;
- Members of our staff, who are subject to strict confidentiality obligations;
- Subcontractors who provide specific or ancillary services on behalf of SMSH and in accordance with its instructions. In this case, the data protection measures taken by the

subcontractors have been verified by SMSH and are contractually agreed between SMSH and the subcontractor;

- Public authorities or bodies when required by law.

Furthermore, we refrain from disclosing your data or transferring it to third parties unless such transfer is required by a competent judicial or administrative authority.

9. Are your data transferred outside the European Union?

We only transfer your data to a country outside the European Union if that country ensures an adequate level of protection within the meaning of the legislation in force, and in particular the Law of 8 December 1992 on the protection of privacy and its implementing decrees, as well as the GDPR, or within the limits permitted by the legislation in force, for example by ensuring data protection through appropriate contractual provisions.

10. Updates and changes to our Privacy Policy

We may amend this Privacy Policy, in particular in the event of legislative changes. We invite you to consult this policy regularly.

In addition, we will inform you of any changes to the content via our website and other frequent communication channels.

11. Links to other websites

Our website may contain links to other websites. We are in no way responsible for the content of these websites and we encourage you to review the data collection practices of these websites.

12. Contacting us and contacting the Data Protection Authority

If you wish to exercise any of the rights listed above, report a problem encountered on our applications, require specific assistance, or wish to send a comment, please contact us using one of the methods listed below:

- by email : privacy@sms-agency.com
- by post: SA SMSH, Rue du Coquelet 134, 5000 Bouge-Namur

Please do not hesitate to contact us if you believe that we are not processing your data with the care you expect.

You may also contact and/or lodge a complaint directly with the Data Protection Authority, whose contact details are as follows:

- Rue de la Presse, 35, 1000 Brussels
- +32 (0)2 274 48 00