# Privacy and personal data protection policy

### **Introduction**

The purpose of this policy is to explain in complete transparency to the persons concerned how their data is processed and to inform them of the measures taken to preserve its confidentiality and security.

We inform you that this policy may be modified at any time. It is therefore advisable to consult it regularly.

### 1. The controller

The controller of the data collected and processed is **PETROPREMA SA/NV**, hereafter "We, us, our".

We are established at Rue Joseph Genotstraat 15, 1080 Brussels.

### Our BCE number is BE0434.071.535

You can contact our data protection officer by writing to him at the following address: DPO, Rue Joseph Genotstraat 15, 1080 Brussels or by sending him an e-mail to <u>dpo@petroprema.com</u>.

As data controller, we must respect several obligations such as, for example: guaranteeing your rights, notifying you of any security breaches, establishing a register, etc.

#### 2. What data do we process?

Only data that is adequate, relevant and limited to the purpose of the processing may be processed.

The methods of collection and the data processed may vary depending on the purposes of the processing.

The processed data is listed in the table below.

Collected and treated data	Terms of collection
1. Purpose:	Online
The management of customers which covers in particular contracts, invoices and accounting and also the management of customer accounts.	
Data collected: - identification data (surname, first name, age, address, telephone number) - electronic identification data - billing data	

## 3. How do we justify the treatment of your data ?

The processing of personal data includes any possible operation on this data, such as, for example, their collection, recording, use or storage.

Any processing of data must necessarily be based on a legal basis determined by the GDPR.

The table below shows the processing carried out, the purpose of use of this processing and the legal basis justifying said processing.

Purpose of use	Legal basis for processing
Customer management, which notably covers contracts, invoices and accounting, and also the management of customer accounts.	The legal basis is the execution of a contract concluded with You (Article 6.1.b) GDPR).

# 4. Are my data stored?

Data cannot be stored longer than necessary.

It is therefore appropriate to set the retention period in this policy.

Purposes	Conservation period [DV1]
Sales, Customer Management	2 years
Accountancy, taxes	7 years

#### 5. Are my data communicated?

We share your data as part of our activities with our staff or with our duly authorized suppliers or subcontractors.

For example, we are required to communicate your data to our accountant, our email service provider, the post office, etc.

We communicate your data to the supervisory authorities, courts and government bodies when a legal obligation, regulation or legal procedure requires us to do so.

We are also likely to transmit your data in good faith considering that this action is required to comply with any law or regulation in force but also in order to protect and defend our rights or those of other users of our services.

In all circumstances, we ensure the protection of your data by agreements ensuring confidentiality.

We maintain a list of our subcontractors but, for security reasons, this is only communicated on first request and as soon as possible. You can contact us at the following address: <u>sales@petroprema.com</u>

# 6. Are my data transferred abroad?

Some of your data is transferred within the European Union. Within this space, personal data benefits from the same level of protection as in Belgium.

We do not make transfers outside the European Union.

If applicable, if we were to transfer the data to a country outside the Union or grant access to a subcontractor, service provider or third party located outside the Union, this is only authorized if and only if :

- The European Commission has issued an adequacy decision granting an adequate level of protection equivalent to that provided by European legislation, personal data will be transferred on this basis.
- Appropriate safeguards have been implemented in accordance with the GDPR, such as Commission Standard Clauses, approved binding corporate rules, approved code of conduct or consent.

# 7. What are my rights as a data subject?

You have rights as a person affected by the processing. These rights are as follows: The right of access, including the right to know whether we are processing your data; The right to have a copy of the data processed; The right to rectify the data processed if they are incorrect, incomplete or irrelevant; even the right to ask us to erase your data, the right to the portability of your data.

In addition, you have the right to object to processing when it is based on our legitimate interest, you have the right to withdraw your consent when the processing is based on consent.

For this purpose, you can contact us at the following address <u>dpo@petroprema.com</u>.

You can also limit the processing of the processed data;

- If you dispute the accuracy of this data. Pending the assessment of the interests involved before exercising the right to object to the processing of some of your personal data.
- If the processing of your personal data is unlawful, but you nevertheless do not wish to exercise your right to erasure of the data.
- If we no longer need your personal data, but you need it in connection with legal proceedings.

We remind you that these rights are not absolute.

If we have a legal obligation, which does not allow us to follow up on the exercise of your rights, we will not fail to keep you informed.

For more information about your rights, contact us at the following address <u>dpo@petroprema.com</u>.

## 8. Where can I file a complaint?

You can always contact our data protection officer.

However, you can always file a complaint with the Data Protection Authority:

www.autoriteprotectiondonnees.be/ Rue de la Presse, 35 à 1000 Bruxelles Tel.: +32 (0)2 274 48 00 Télécopie: +32 (0)2 274 48 35 Courriel : <u>contact@apd-gba.be</u>

You can also lodge a complaint with the court of first instance in your place of residence.

For more information on complaints and possible remedies, you are invited to consult the following address of the Data Protection Authority:

https://www.autoriteprotectiondonnees.be/introduce-une-requ%C3%AAteune-plainte

If you need more information about your rights contact us.

You can exercise your rights by sending an email to the following address: <u>dpo@petroprema.com</u> or by post to the following address: rue Joseph GENOTstraat 15, 1080 Brussels - Belgium

We will not fail to follow up on your request as soon as possible and at the latest within the month following receipt of your request, we will inform you of the follow-up we have granted.

Depending on the difficulty of your request or the number of requests we receive from other people, this period may be extended by two months. In this case, we will notify you of this extension within one month of receiving your form.

In all circumstances, when communicating this information, we are always obliged to take into account the rights and freedoms of other people.

# 9. Data Security

We put in place the appropriate technical and organizational measures to protect your personal data against any accidental or unlawful modification or loss, or against any unauthorized use, disclosure or access.

We take all reasonable measures under the principles of privacy by design ("privacy by design") and privacy by default ("privacy by default") to put in place the necessary safeguards and secure the processing of your data.

<u>dpo@petroprema.com</u> undertakes on first request to provide a detailed list of the security measures put in place to protect the personal data processed.

#### 10.Cookies

We use cookies on our website.

To learn more about our Cookies Policy, please visit our website, under the "Cookies Policy" tab.

# 11. Applicable law and competent jurisdiction

This policy is governed by Belgian law.

Any dispute relating to the interpretation or execution of this Policy will be subject to the exclusive jurisdiction of the courts of the judicial district of Brussels.

# 12. Update of this charter

We reserve the right to modify this privacy policy to take account of legislative or regulatory changes and developments or to adapt it to our practice.

We advise you to and therefore invite you to consult it regularly.

Last updated on 18/02/2022.