



CONNECTIVE

# Privacy Policy

creating trust connecting value

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Subject : Privacy Policy

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## **Subject**

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The purpose of this Notice is to tell you what information we collect via from you as a data subject, how and when it may be collected and what happens to it.

## 1. General

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This Privacy Statement (the "Statement") applies to the [www.connective.eu](http://www.connective.eu) website ("Website"), owned and operated by:

*Connective NV  
Wapenstraat 14, box 301  
B-2000 Antwerp  
Belgium  
Business Number: 0467.046.486  
hereinafter "Connective", "we" or "us"*

Connective deems the protection of privacy of the utmost importance and wishes to enable you – as user of its Website – to maintain full control over what happens to your Personal Data and your privacy and to inform and protect you accordingly.

All capitalized terms that are not defined in this Statement shall have the meanings as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("General Data Protection Regulation" or "GDPR").

Your Personal Data and your privacy are protected by Connective in accordance with Belgian and European regulations on the protection of privacy. Please read this Statement very carefully. The following describes not only your rights, but also the way in which you can exercise these rights.

By using our Website, disclosing your Personal Data, and accepting this Statement, you expressly consent to the manner in which Connective collects and processes your Personal Data as described in this Statement.

## 2. Who processes your Personal Data and how can you contact us?

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Connective is responsible for the processing of your Personal Data that you provide through the Website. Connective has appointed a Data Protection Officer, whom you can always contact for questions about your privacy and the processing of your Personal Data. The Data Protection Officer can be reached at:

*Connective NV  
attn. Data Protection Officer  
Wapenstraat 14, box 301  
B-2000 Antwerp  
Belgium  
email: [dpo@connective.eu](mailto:dpo@connective.eu)  
tel.: +32 3 612 58 60*

### 3. What Personal Data is collected and processed?

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Connective processes different types of Personal Data, depending on the services you use on the Website and as relevant:

<i>Contact information</i>	name, address, email address, ...
<i>Technical information</i>	data from computers, telephones or other devices on which you use the Website, your IP address, browser type, etc.
<i>History and logs</i>	searches carried out on the Website, browsing behavior, date and time when the Website was visited, etc.
<i>Cookies</i>	See our <a href="#">Cookie Policy</a> .

### 4. What are the purpose and principles of the processing of your Personal Data?

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The purpose and principles of the processing of your Personal Data mainly depends on the category of Personal Data concerned. Below you will find an overview of the purpose and principles of the various Personal Data that we process.

<b>Contact information</b>	<i>Purpose</i>	We collect your contact information in order to answer your questions submitted through the Website, provide you with any files you have requested, keep you informed about Connective and its products, promotional offers, events, news articles, etc., and to use your contact information for direct marketing purposes.
	<i>Grounds for Processing</i>	performance of the agreement and consent
<b>Technical information</b>	<i>Purpose</i>	We collect your technical information to further tailor our Website to your use and to improve our Website in line with future developments.
	<i>Grounds for Processing</i>	Legitimate interest and consent
<b>History and logs</b>	<i>Purpose</i>	We collect your history and logs to further tailor our Website to your use and for future improvements.
	<i>Grounds for Processing</i>	Legitimate interest and consent

The consent you provide is always free, and you have the right to withdraw this consent at any time. Withdrawal of consent does not affect the processing of Personal Data (i) prior to such withdrawal, (ii) based on any legitimate ground for processing Personal Data, and (iii) in case of a legitimate interest of the processing.

The above reasons may not be exhaustive, and Connective may at any time process your Personal Data for any other legitimate reason. In such cases, Connective will notify you as soon as possible of the reason. Updates of this Statement may constitute such a notification.

## 5. Direct Marketing

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Connective will also use your Personal Data for direct marketing purposes. This enables Connective to keep you informed about its products, updates, events, etc. You give your explicit consent for this, but you may withdraw this at any time.

## 6. Receiving and sharing Personal Data

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Connective receives your Personal Data in cases as and when:

- you complete the contact form;
- you download content from our Website;
- certain information is forwarded via cookies or your browser;
- ...

Connective will always share your Personal Data in a minimal way. However, to be able to follow through on your request or action on our Website, Connective may sometimes need to share Personal Data with third parties. You therefore provide your express consent to share your Personal Data as described in this Statement. Processors and sub-processors of Connective always act under the responsibility of Connective. If Connective contracts Processors or sub-processors this will always be done in accordance with a processor agreement that meets the requirements of the GDPR and that protects your Personal Data as well as possible.

Connective may share your Personal Data with third parties, for sending newsletters, storing and processing your Personal Data, responding to your queries, sending content to you, and for optimizing our Website. Your Personal Data may also be shared within the Connective Group.

Connective will never share or sell your Personal Data with or to commercial enterprises.

If you are redirected to another website or application through the Website, you should take any terms and conditions that apply to that website or application into account.

## 7. Transfer of Personal Data to countries outside the EEA

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In principle, Connective does not transfer your Personal Data to countries outside the EEA. It is, however, possible that Connective – through its Processors or sub-processors - does transfer your Personal Data to countries outside the EEA. Should a less strict protection for Personal Data apply in a specific country than within the EEA, Connective will then ensure that the same level of protection is achieved (e.g. by concluding an agreement with the processor located in a country outside the EEA).

## 8. How will my Personal Data be retained?

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Connective applies the following retention periods for your data:

- |                                |  |
|--------------------------------|--|
| • <b>Contact information</b>   | as long as the consent is valid and has not been withdrawn                 |
| • <b>Technical information</b> | maximum two years from the time when the technical information was created |
| • <b>History and logs</b>      | maximum 2 years from the time when the item or log was created             |

Connective retains your Personal Data in its own databases and/or in the databases of its Processors or sub-processors. You may ask Connective to provide a copy of the list of these Processors and sub-processors at any time.

## 9. How are my Personal Data safeguarded?

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Connective has developed appropriate technical and organizational measures, safeguards and assurances to process your Personal Data in accordance with applicable Belgian and European regulations, in particular to protect your Personal Data against loss, misuse, or unauthorized alteration.

Connective maintains a team of technicians, automated systems, and advanced technologies, such as SSL data traffic (https), protection of the environment with security headers (PHP), security plugins (WordPress) and password policies to protect its Website. The hosting server is protected with the most recent version of PHP 7 (included the most recent security fixes), servers are running on Apache in a suExec environment, IDS/IPS systems offer protection to attacks, ModSecurity is installed on all shared servers and security rules are weekly updated.

Connective makes all reasonable and appropriate efforts to protect the confidentiality of your Personal Data. Despite the above measures taken by Connective, you should be aware that there are always risks associated with sending Personal Data over the Internet. The security and protection of your Personal Data can never be fully guaranteed.

Under no circumstances does Connective accept responsibility for any direct or indirect damage resulting from faulty or unlawful use of the Personal Data by a third party.

## 10. What rights do I enjoy?

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If and in as far as provided for in the applicable Belgian and European regulations, you have the right:

- a) to confirmation as to whether Connective processes your Personal Data and, where this is the case, to access the Personal Data that Connective processes;
- b) to corrections by Connective, without undue delay, of any inaccurate or incomplete Personal Data;
- c) to have your Personal Data deleted by Connective;
- d) to obtain your Personal Data and to transfer them to another Controller or Processor;
- e) to obtain a limitation of the processing of your Personal Data from Connective, in as far as this is possible;
- f) to receive your Personal Data in a structured, common and machine-readable format;
- g) to prevent the Processing of your Personal Data and the use of your Personal Data for direct marketing purposes.

You may exercise these rights by contacting the Data Protection Officer and providing him or her with a copy of your identity card.

If and to the extent provided for in the applicable Belgian and European regulations, you have the right to file a complaint with the competent supervisory authority should the processing of your Personal Data violate the applicable regulations. In Belgium, this is the Commission for the Protection of Privacy ("*Commissie voor de bescherming van de persoonlijke levenssfeer*").

## 11. Amendments to this Statement

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Connective may amend this Statement at any time. The date of the most recent version is shown in the top right-hand corner of the Statement. Amendments are posted on the Website to keep you informed at all times of the information that Connective collects and of how it uses and shares this information.

Amended versions of this Statement take effect ten (10) days after their publication on the Website. Where required they will always be submitted for prior approval.



## **12. Consent for disclosure**

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You acknowledge, confirm, and expressly consent that we may disclose your Personal Data if this is required by law, or if Connective determines in good faith that such disclosure is required in order:

- a) to comply with any pending judicial inquiry, judicial order or litigation pertaining to the Website;
- b) to compel observance of the general terms and conditions of Connective;
- c) to respond to claims against Connective regarding Personal Data that violate any rights of third parties;
- d) to safeguard the rights, property and safety of Connective, its employees, users, and the general public.

Connective may disclose your Personal Data to competent police or judicial authorities or other official government authorities if Connective deems this useful or necessary, in its sole discretion, for the investigation of fraud, intellectual property infringement or any other harmful activity, or if Connective reasonably suspects that such activity may expose Connective or you to any liability.

## **13. Liability**

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If Connective has legitimately transmitted your Personal Data to a third party (not being a Processor or sub-processor), Connective shall not be liable for any unlawful processing or unlawful use by that third party.

## **14. Applicable law and competence clause**

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This Statement shall be governed, interpreted, and implemented in accordance with Belgian law, which applies exclusively in the event of any dispute.

The Belgian Courts and the Antwerp division within the jurisdiction of Antwerp are exclusively competent to decide on any dispute that may arise from the interpretation or implementation of this Statement, without prejudice to the consumer's right to present a dispute before the competent court on the basis of a mandatory statutory provision.