

## GENERAL

Your personal data will be processed by Digitopia in accordance with the prevailing privacy law, to include the General Data Protection Regulation 2016/679 (hereinafter 'GDPR') and the 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') describes:

- the purposes for which we process your personal data,
- with whom we share your personal data, and
- how we protect your personal data.

All data directly related to your person or any information that identifies you, such as your name, telephone number, email address, location, etc. is considered personal data. Please read this Privacy Policy thoroughly so that you are aware of how we process your personal data.

## WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

This Privacy Policy applies to the processing of your personal data by or on behalf of:

Digitopia NV, with registered office at Gouwberg 41, 2970 Schilde, registered in the Register of Legal Persons (Antwerp, Antwerp division) under number 0884.473.219 (hereinafter 'Digitopia', 'we', 'us' or any derivative thereof).

Digitopia is responsible for processing your personal data and acts as controller.

## PROCESSING OF YOUR PERSONAL DATA: WHAT PERSONAL DATA DO WE COLLECT AND ON WHAT LEGAL GROUNDS IS IT PROCESSED?

An overview of the personal data processed by Digitopia has been provided below. It clarifies the legal ground(s) upon which and for which purpose(s) your personal data will be processed.

### Customers and suppliers

In terms of our contractual relationships with customers and suppliers, we may receive the following personal data:

- Name;
- Email address;
- Phone number;
- Address and other location data;

We process the aforementioned personal data within the context of the preparation or execution of the agreement with you as a customer and/or supplier. Should you fail to provide the necessary personal data, we may be unable to provide the full extent of our services.

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We process this personal data within the framework of our contractual relationship or in preparation thereof, which is required to carry out the following:

- Provision of information and assistance;
- Management of Digitopia's daily affairs and activities;
- Performing/concluding ongoing agreements (including but not limited to the follow-up of orders and deliveries of services and products);
- Follow-up of administrative, accounting, technical, and legal obligations.

Furthermore, Digitopia may, within the framework of its contractual relationship with you, process your personal data for any additional purposes required for its daily activities.

Within the context of your contractual relationship or in preparation thereof, your personal data will be communicated to suppliers, specific service providers (i.e. internet service providers), commercial partners, accountants, lawyers, IT professionals, specialists, etc. for the management and provision of services and/or products. These parties are all located within the European Economic Area (hereinafter referred to as the 'EEA').

#### Customer and supplier questions, complaints, and comments

Our website contact form is available should you wish to ask questions or voice concerns, complaints or comments. Part of this form's use includes the collection, storage and processing of the personal data below:

- Name;
- Email address;

Should you fail to provide the required personal data to respond to your question, we may be unable to respond to your contact form due to the lack of information.

Processing of your personal data is solely for the purpose of addressing your concern, complaint or comment and is based on Digitopia's legitimate interest in improving its services and providing a response to your request or, where a contractual relationship is concerned, processing occurs within the context of the performance of the agreement and our Services.

Moreover, to provide a comprehensive response to your request, we may forward personal data obtained through the contact form on our website to Digitopia's partners [\$\$\$]. All third-party Digitopia partners are headquartered in the EEA.

#### Digitopia's legal obligations

Digitopia may, in terms of its activities, be legally obliged to process certain personal data. For example, we are required to comply with legal obligations relating to the prevention, monitoring and combat of criminal conduct, crime, fraud and money laundering activities.

Your personal data may be shared with public authorities, supervisory authorities and/or judicial investigative bodies in the context of a legal obligation, whether or not at their explicit request.

#### Digitopia's legitimate interest

Digitopia may have a legitimate interest in processing your personal data in the context of its activities. In this case, these interests shall outweigh your right to privacy. Should this ground for processing be invoked, Digitopia will communicate the legitimate interest to you in advance and you will receive additional information in relation thereto.

#### RETENTION PERIOD

We will retain your personal data for as long as required by applicable law or for the purposes for which it is processed.

In particular, Digitopia must observe the tax-related and legal retention periods, including but not limited to the ten-year retention period applicable to its contractual liability and the seven-year retention period incumbent on accounting documents. At the end of this period, Digitopia shall anonymise or delete your personal data.

#### TRANSFER OF PERSONAL DATA

Personal data that we collect is solely processed internally and is not transferred to third parties except in terms of the aforementioned processing activities (i.e. external service providers, accountants, lawyers, etc.). Digitopia processes your personal data in Belgium.

#### PROTECTION OF YOUR PERSONAL DATA

We apply several technical and organisational security measures to protect your personal data against fraudulent or unauthorised access or use, as well as against accidental loss or damage to the integrity of your personal data.

These measures are designed to take the potential impact on your privacy and the associated costs into account, in accordance with the customary standards in practice.

#### YOUR RIGHTS

You may request information about how your personal data is collected, stored and processed by Digitopia at any time. You have the right of access to and the right to request that your personal data is rectified where incorrect.

You also have the right to request a restriction on the processing of your personal data. In addition, you may revoke your consent to the processing of your personal data should you have given it.

You may also object to the use of your personal data for direct marketing purposes or to the sharing of your personal data with a third party for the same. Under certain conditions, you may invoke the right to data portability. In such a case, we will provide you with the personal data that you have provided us in a customary, structured format and you will be afforded the opportunity to transfer this personal data to your preferred third party.

You may demand that we delete your personal data, except in a number of cases, such as in the event that Digitopia is required by law to retain the personal data or to serve as evidence of a transaction.

The aforementioned rights may only be exercised in a reasonable manner and in accordance with the limitations of the applicable law.

Should you disagree with how Digitopia processes your personal data, you may lodge a complaint with the Belgian Data Protection Authority (DPA):

Drukpersstraat 35, 1000 Brussels

Tel: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

Mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)

#### CONTACT

Digitopia has a data protection contact to handle all your questions or requests related to this Privacy Policy or (the processing of) your personal data.

For questions, requests or complaints, or to exercise your rights as described in this Privacy Policy, please contact us by email at [info@digitopia.be](mailto:info@digitopia.be) or by post at Gouwberg 41, 2970 Schilde.

#### CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy is regularly updated, and any amendments made will be communicated to you in a timely manner. The Privacy Policy was last updated on 29.06.2020.