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## PRIVACY STATEMENT

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### INTRODUCTION

Data protection is of a particularly high priority for the management of ClearMedia.

ClearMedia sets great importance on protecting the privacy of all people whose data it collects and processes.

This privacy statement describes how ClearMedia processes and protects the personal information of individuals, who we are, what data we process, why and how.

ClearMedia has adopted an internal Privacy policy which is applicable to all our workers for the collection, processing, use, dissemination, transfer, and storage of personal information. It imposes common rules and aims at ensuring a high level of protection of personal information within ClearMedia.

To this end, ClearMedia ensures an adequate level of technical and organizational security of your data and complies with the legislation in force in Belgium, in order to protect you from any data leaks, including loss, destruction, unauthorized access or misuse.

### 1. DEFINITIONS

Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, the following terms:

**Personal data:** Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data subject:** Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

**Processing:** Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Restriction of processing:** Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

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**Profiling:** Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

**Pseudonymization:** Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Controller:** Controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Processor:** Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Third party:** Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**Consent:** Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. WHO ARE WE?

The data controller of the data processing activities is ClearMedia who has determined the data processing means and purposes. They may vary on a case by case basis.

## 3. WHY WE COLLECT YOUR PERSONAL INFORMATION?

We collect personal data only if required to provide our products or services, fulfil our legitimate business purposes and/or comply with applicable laws and regulations. Specifically, we collect information provided by you in order to establish a communication or make a purchase. We use your personal information also to manage and maintain our relationship with you, including responding to an inquiry, question or comment made by you and providing you with other customer support. And finally, we use your personal data to allow you to participate in an event organized by us an/our business partners.

If you provide us with personal information of third parties (such as the details of your single point of contact, you agree to notify each individual before sharing their personal information

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with us, explain that their personal information will be processed in accordance with this Privacy Statement and obtain their consent where appropriate.

## 4. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION?

Personal data will be retained for as long as it's necessary for the purposes set out above. After this period, your personal data will be irreversibly destroyed.

## 5. HOW WE PROTECT YOUR PERSONAL INFORMATION?

We take the of all data we hold very seriously. We have a framework of policies, procedures and training in place covering professional secrecy, data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

## 6. THE LEGAL BASIS WE HAVE FOR PROCESSING YOUR PERSONAL DATA

The use of personal information is necessary, with respect to the purposes mentioned in section 3 above, to, respectively:

- Perform the contract entered between ClearMedia and you in the context of the use of our products and services.
- Comply with legal obligations to which we are subject. For instance, mandatory tax and accounting obligations or addressing filing obligations and requests by competent regulatory bodies and authorities.

## 7. WHAT IS YOUR RIGHT?

ClearMedia particularly pays attention to the rights you have as a concerned person. You have the right to inspect, correct and remove your personal data. You can also object to the use or processing thereof. You can withdraw your consent and change your choice.

In order to exercise your rights as set out below, we invite you to fill in <https://www.clearmedia.be/gdpr-form> and send it to our Compliant Officer at the following email address: [dpo@clearmedia.be](mailto:dpo@clearmedia.be).

- **Right to withdraw consent:** You have the right to withdraw your consent to the processing of your Personal Data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right of access, information and rectification:** You may at any time request information about our treatments, the objectives pursued, the categories of personal data we keep about you, the retention periods or criteria for determining these, your other rights, other sources of your data.

You can also request that your data be rectified or completed, if it is inaccurate or incomplete. When exercising this right, you must indicate on the form the specific data that you want to be corrected or completed. We will not fail to respond to your request as soon as possible, however, when providing this information, we are always obligated to consider the rights and freedoms of others.

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- **Right to limitation of treatment:** You have the right to request the limitation of the processing of your personal data when:
  - o you dispute the accuracy of this data;
  - o you are in the waiting period necessary to evaluate the interests involved before exercising the right of opposition to the processing of some of your personal data;
  - o the processing of your personal data would be illegitimate, but you do not wish to exercise your right to erase data;
  - o we no longer need your personal data for the purposes set out in this data protection declaration but need it in the context of a legal action.
- **Right of opposition** You may object to the processing of your personal data if your data is processed based on the legitimate interests of ClearMedia or on the basis of consent. To exercise this right, you must indicate on the form, to which specific treatment you object and for what specific reasons. This information is necessary to ensure the correct balance of interests.
- **Right of portability** If your data is processed as part of our contractual obligations, or consent, you have the right to request that your personal data be transferred to you in the form in which we retain it or to your other data controller designated by your care.
- **Right to erasing data (right to forget)** In the cases provided by the GDPR or the law, we will proceed to the deletion of your personal data upon request from you. No later than one month after receipt of your request and depending on the difficulty of your application or the number of requests we receive from other persons, this period may be extended by two months. In this case, we will notify you of this extension in the month following receipt of your form. In some cases (e.g. legal obligations, rights of other people, limitation periods, ...), you will not be able to exercise your rights, in whole or in part. You will then be informed as to why we cannot fully meet your request.

## 8. QUESTIONS, COMMENTS, COMPLAINTS AND DATA LEAKS

ClearMedia remains at your disposal for any questions, comments or complaints regarding the protection of your personal data. You also have the right to lodge a complaint with:

The Data Protection Authority (PDA) at the following address:

Persstraat, 35 - 1000 Brussels or via their website:  
<https://www.autoriteprotectiondonnees.be/>

## 9. MODIFICATIONS

ClearMedia may at any time make corrections, additions or modifications to this Privacy Statement for any number of reasons. The most current version can be consulted permanently on our web-site.