

# Privacy Policy

This Privacy policy handles the processing of your personal data by the responsible party of the processing: Procurios BV (BE0879511074) located at Hendrik Consciencestraat 5/bus 302, 2800 Mechelen, hereafter named 'Procurios', 'us' and 'we'.

This Privacy Policy is aimed at everyone (including, but limited to: prospects, (ex-)customers, (ex-)suppliers, candidates, ...) that have in one way or another shared personal information with us, hereafter referred to as '**you**'. In this Privacy Policy we transparently explain why we need your data and what we do with it. We do this because we wish to be transparent about it and since it is legally obliged.

We aim to uphold the Belgian and European to the fullest extent. We also aim to offer you the possibility to review this Privacy Policy before sharing your personal data with us.

## 1. Applicable law

Procurios upholds the *law of December 8th 1992 to protect the privacy regarding the processing of personal data*, as determined by the *law of December 11th 1998*, as also in the Anti-spam guidelines from the *Book XII of the Code of Economical Right regarding the rights of the electronic economy*.

With the current Privacy Policy, Procurios complies with the code in the *European Decree 2016/679 of April 27th 2016* regarding the protection of personal data.

The responsible party of processing your personal data is Procurios.

## 2. What Procurios knows about you

The information we gather about you depends on two factors:

1. Your relationship with us
2. Your actions you take in which you share personal information with us

Furthermore, it is important to understand the actual differences between:

1. Individuals that visit our website for the first time
2. Visitors that return to our website

**Are you visiting our website for the first time?** In that case there is little chance that we recognize you. This remains that way until you share your personal information with us through the website.

However, this does not imply that we haven't gathered any personal information about you. There is a chance that you've shared information with us through another channel (such as social media, emails, physical contact, ...)

Apart from that, it is also possible that you've never shared your personal information with us, yet still receive marketing communications. This is allowed within the limits of the law since we use information that is publicly available. Examples can include information that we can find on the website of your organization or information published in the Crossroads Bank for Enterprises. This information can be used to contact potentially interested parties in Procurios. If you do not wish to receive any information about us, you can let us know and we'll make sure you're unsubscribed.

**Are you returning to our website?** In that case, there is a chance we will recognize you based on information you've shared with us during a previous visit. We use cookies for instances like these.

## **I am a customer and I pay invoices**

### **What personal data do we store?**

- Name
- First name
- Function
- Company address
- Invoicing address
- Email address
- Phone number (fixed/mobile)
- Company name
- Analytic data regarding the usage of our solutions (e.g. time of login/logout, used functionalities, ...)
- Login credentials linked to your user account
- Anonymised IP address and linked geographic location data (country and region)

- Communication preferences
- Other personal data that you have shared voluntarily

## Overview of the processing

Processing activity	Purpose of processing	Legal ground
Informative communication: <ul style="list-style-type: none"> <li>- Product updates</li> <li>- Updates on support questions</li> <li>- Emails regarding the use of Procurios solutions</li> </ul>	Support	Justified interest / Legitimate interest
	No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the agreement	
Marketing communication: <ul style="list-style-type: none"> <li>- Invitation to events</li> </ul>	Communication	Justified interest / Legitimate interest
Customer satisfaction research	Statistic analysis	Justified interest / Legitimate interest
Invoicing	Customer management	Carrying out the agreement
	No possibility to object, due to the fact that it is inherent to carrying out the agreement and to the legal framework regarding the safekeeping obligations for invoices	

## **I am a Procurios user**

### **What personal data do we store?**

- Name
- First name
- Function
- Company address
- Email address
- Phone number (fixed/mobile)
- Company name
- Analytic data regarding the use of our solutions (e.g. time of login/logout, used functionalities, ...)
- Login credentials linked to your user account
- Anonymised IP address and linked geographic location data (country and region)
- Communication preferences
- Other personal data that you shared voluntarily

### **Overview of processing**

**Processing activity**

**Purpose of processing**

**Legal ground**

#### Informative communication:

- |   |         |   |
|---|---------|---|
| - Product updates                                 |         |   |
| - Updates on support questions                    | Support | Justified interest /<br>Legitimate interest |
| - Emails regarding the use of Procurios solutions |         |   |

No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the agreement

#### Marketing communication:

- |                        |               |   |
|------------------------|---------------|---|
| - Newsletter           | Communication | Justified interest /<br>Legitimate interest |
| - Invitation to events |               |   |

- |                                |                    |   |
|--------------------------------|--------------------|---|
| Customer satisfaction research | Statistic analysis | Justified interest /<br>Legitimate interest |
|--------------------------------|--------------------|---|

## I sent Procurios an email

### What personal data do we store?

- Email address
- Other personal data that you have share voluntarily

### Overview of processing

<b>Processing activity</b>	<b>Purpose of processing</b>	<b>Legal ground</b>
Conversation between you and Procurios	Communication and targeted responses to possible future conversations  No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the activities	Justified interest / Legitimate interest

## **I contacted Procurios by phone**

### **What personal data do we store?**

- Phone number
- Recording of the telephone conversation (optional - if this occurs, you will be notified before the conversation)
- Other personal data that you have shared voluntarily

### **Overview of processing**

<b>Processing activity</b>	<b>Purpose of processing</b>	<b>Legal ground</b>
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Conversation between you and Procurios	Communication and targeted responses to possible future conversations	Justified interest / Legitimate interest
	No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the activities	

## I use the Procurios chat function

### What personal data do we store?

- Name
- First name
- Email address
- Other personal data that you have shared voluntarily

### Overview of processing

Processing activity	Purpose of processing	Legal ground
Conversation between you and Procurios	Communication and targeted responses to possible future conversations	Justified interest / Legitimate interest

No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the activities

## **I use(d) a Procurios demo environment**

### **What personal data do we store?**

- Name
- First name
- Function
- Company address
- Email address
- Phone number (fixed/mobile)
- Company name
- Analytic data regarding the usage of our solutions (e.g. time of login/logout, used functionalities, ...)
- Login credentials linked to your user account
- Anonymised IP address and linked geographic location data (country and region)
- Communication preferences
- Other personal data that you have shared voluntarily



## Overview of processing

Processing activity	Purpose of processing	Legal ground
Informative communication: - Product updates - Updates on support questions - Emails regarding the use of Procurios solutions	Support	Justified interest / Legitimate interest
	No possibility to object, due to the minimal impact on your privacy and the justified interest for carrying out the agreement	
Marketing communication: - Invitation to events	Marketing	Justified interest / Legitimate interest
Customer satisfaction research	Statistic analysis	Justified interest / Legitimate interest
Contact requests	Marketing - we contact you to understand your interest in Procurios	Justified interest / Legitimate interest
	In order to look after the justified interest, as part of our marketing activities or within the context of realising our regular economical activities	

## I subscribed to the Procurios newsletter

### **What personal data do we store?**

- Name
- First name
- Email address
- Communication preference
- Other personal data that you've shared voluntarily

### **Overview of processing**

<b>Processing activity</b>	<b>Purpose of processing</b>	<b>Legal ground</b>
Marketing communication: <ul style="list-style-type: none"><li>- Newsletter</li><li>- Invitation to events</li></ul>	Marketing	Consent

### **I registered for a Procurios event**

### **What personal data do we store?**

- Name
- First name
- Function
- Company address
- Invoicing address
- Email address
- Phone number (fixed/mobile)
- Company name
- Login credentials linked to your user account
- Anonymised IP address and linked geographic location data (country and region)
- Communication preferences
- Photo/video
- Other personal data that you have shared voluntarily

## Overview of processing

<b>Processing activity</b>	<b>Purpose of processing</b>	<b>Legal ground</b>
Informative communication regarding the event	Organisation of the event  No possibility to object, due to the minimal privacy impact and the justified interest for carrying out the agreement	Carrying out the agreement
Photo and/or video recording during the event	Marketing	Justified interest / Legitimate interest

Individuals can indicate whether or not they wish to be recognizable on photo and/or video material. Furthermore, after the event, they have the right to demand the deletion of photos on which they are recognizable

Marketing communication: - Invitation to future events	Marketing	Justified interest / Legitimate interest
Customer satisfaction research	Statistic analysis	Justified interest / Legitimate interest
Contact requests	Marketing – we contact you in order to understand your interest in Procurios	Justified interest / Legitimate interest

In order to look after the justified interest, as part of our marketing activities or within the context of realising our regular economical activities

Invoicing	Customer management	Carrying out the agreement
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No possibility to object, due to the fact that it is inherent to carrying out the agreement and to the legal framework regarding the safekeeping obligations for invoices

## I visited the Procurios offices

### What personal data do we store?

- Name
- First name
- Function
- Email address
- Phone number (mobile)
- Company name
- Camera images
- Other personal data that you have share voluntarily

### Overview of processing

Processing activity	Purpose of processing	Legal ground
Registration of presence	Safety reasons  No possibility to object, due to the outweighing interest of the action (safety reason)	Justified interest / Legitimate interest
Video recordings by security camera	Safety reasons  No possibility to object, due to the outweighing interest of the action (safety reason)	Justified interest / Legitimate interest

## **I am not a customer but I have a commercial relationship with Procurios**

### **What personal data is stored?**

- Name
- First name
- Function
- Company address
- Invoicing address
- Email address
- Phone number (fixed/mobile)
- Company name
- Login credentials linked to your user account
- Anonymised IP address and linked geographic location data (country and region)
- Communication preferences
- Other personal data that you have shared voluntarily

### **Overview of processing**

<b>Processing activity</b>	<b>Purpose of processing</b>	<b>Legal ground</b>
Informative communication	Safeguarding our commercial relationship	Justified interest / Legitimate interest

No possibility to object, due to the minimal privacy impact and the justified interest for carrying out the agreement

#### Marketing communication

- Newsletter

- Product updates

Marketing

Justified interest /  
Legitimate interest

- Invitation to events

- Market research

Carrying out our commercial agreement

Supplier management

Carrying out the  
agreement

## I applied for a job at Procurios

### What personal data do we store?

- Name

- First name

- Function

- Email address

- Phone number (fixed/mobile)

- Curriculum Vitae

- Other personal data that you have shared voluntarily

## Overview of processing

Processing activity	Purpose of processing	Legal ground
Contact request	Communication and targeted responses to possible future conversations	Justified interest / Legitimate interest
	No possibility to object, due to the minimal privacy impact and the justified interest for carrying out the agreement	
Screening applicant	Recruitment and selection of new employees	Consent

## 3. Sharing data with third parties

Your data is primarily processed with the aim to conduct business. There are a number of situations in which we will rely on external parties. These third parties can process your data in accordance with clearly outlined instructions.

We can rely on the following categories of data processors:

→ **Marketing purposes**

We could share contact details of prospects to marketing companies and to our partners. These third parties can in turn contact our prospects when we deem our products and/or services relevant for them. In this instance, it is possible at any given time to indicate that you have no further interest in Procurios. We will then unsubscribe you. Data of prospects are not kept any longer than three years.

→ Organizations that we hire for **communication purposes**

→ Organizations that we hire for **analytic purposes**

→ Companies that we hire for recruitment purposes. E.g. recruitment offices.

→ **Technical ICT support** such as hosting, security, integration or database management



- Organizations that we hire for payment purposes. E.g. a payment service provider or a company that collects unpaid invoices.

We issue the necessary contractual measures with all the external parties that we rely on, in order to meet the technical and organisational requirements that guarantee the secure processing of your personal data.

In the event of partial or complete reorganization or a transfer of our activities, in which our business activities are reorganized, transferred, ceased or if we go bankrupt, your data could be transferred to the new entities or third parties that partially or completely take over the business activities of Procurios.

Within its best reasonable efforts Procurios will notify you upfront over the fact that your data will be transferred to the named third party, but you also acknowledge that this is not always possible given the technical and commercial circumstances.

Procurios will not sell, nor rent out, share or in any commercial way make your data available to third parties, unless the above situations occur or after you have explicitly given us permission.

In certain rare circumstances, Procurios could be legally obliged to share your personal data due to a pressing law or code of conduct. Within our best efforts, Procurios will attempt to notify you in advance, unless ordered otherwise due to legal restrictions.

### **3.1. Sharing data to third parties outside of the European Economic Area (EEA)**

It is our best intention to only have organisation within the European Economic Area process your data. In case that is not possible, we only work with organizations that meet the following requirements:

1. The country of destination is on the list of countries that meet the European safety level;
2. For organizations in the United States, we will look for certificates under the EU-US-Privacy Shield;
3. If the organization does not meet the above criteria, we will make the necessary contractual arrangements in accordance with the standards imposed by the Belgian Data Privacy Authority

## **4. Duration of processing**

The personal data is stored by Procurios and processed for a period necessary for the purposes and for the processing in function of the relationship between you and Procurios.

## 5. Your rights

### 5.1. Right of access and right to review:

You have the right to access your personal data at any time for free, as well as the right to understand for which purposes we use it.

### 5.2. Right to correct, delete and restrict:

You have the right to request us to correct your personal data at any given time, as well as to complete or delete it. You acknowledge that when refusing messages or requests to deleting personal data, certain services and products will not be available.

Furthermore, you also have the right to ask us to restrict the processing of your personal data.

### 5.3. Right to oppose:

You have the right to oppose the processing of your personal data for serious or legitimate reasons.

Besides that, you also have the right to oppose the use of personal data for direct marketing purposes; in this event you're not required to give a reason.

### 5.4. Right of free data transfer:

You have the right to receive your personal data that is processed by Procurios in a structured, useful and machine readable form and/or to hand it over to another responsible party

### 5.5. Right to revoke your consent:

For as far as the processing of your data is based on a prior consent, you have the right to revoke your consent.

### 5.6. Practicing your rights:

You can practice your rights by contacting Procurios, either by email to [info.be@prourios.com](mailto:info.be@prourios.com), per postal mail to Procurios or by using the 'Contact us' functionality on our website, only when adding a copy of your passport.

### 5.7. Automatic decisions and profiling:

The processing of your personal data does not contain any profiling and you will not be subject to automated decision making by Procurios.

## 5.8. Right to file a complaint:

You have the right to file complaints to the Belgian Privacy Commission: Commission Data Protection Authority

This does not alter the measures for a civil court.

If you suffer damages as a result of the processing of personal data, you can request a claim for compensation

## 6. Safety and confidentiality

We have developed safety precautions that are adapted on a technical and organisational level, in order to avoid destruction, loss, falsification, modification, unauthorized access or accidental leaks to third parties of personal data, and all other unallowed processing of this data.

In no event or case can Procurios be held responsible for any direct or indirect damages as a result of wrongful or unrightful use of the data by third parties. You are deemed to respect the safety standards at all times, amongst which is preventing unauthorised access to your login and password.

At any given moment in time it is your responsibility to live by the safetycode, in which you (among other things) safeguard and prevent any unauthorised access to your account on Procurios. That means nobody else but you is responsible for any use originating from your computer, IP-address and your identification details, as also the confidentiality of it.

## 7. Access by third parties

We grant access to your personal data by our employees in order to process your personal data.

We guarantee a similar level of protection by issuing contractual obligations towards employees and appointed individuals, that are similar to this Privacy Policy.

## 8. Cookies

An overview of how we handle cookies and which cookies we use is available on our website:

<https://www.procurios.com/en/cookie-policy>

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If you have any further questions or comments regarding the processing of your personal data, please contact us, either by email to [info.be@procurios.com](mailto:info.be@procurios.com), per postal mail to Procurios, or by using the 'Contact Us' feature on our website.