

## PRIVACY POLICY

September 2023

# 1. VGA Euregio: Data Controller

**VGA Euregio**, with its registered office at 3500 Hasselt, Belgium, Genkersteenweg 429, company number (KBO) 0804.699.627 ("**VGA EUREGIO**" of "**we**") will, in her capacity as data controller as in article 4.7 of the General Data Protection Regulation 2016/679 of 27 April 2016 ("**GDPR**"), be responsible for the processing and protection of your personal data. VGA Euregio will process this data in accordance with the applicable laws, in particular the GDPR and subsequent privacy policy.

This privacy policy, which should be read in conjunction with our cookie policy, will inform you about the processing of your personal data by VGA Euregio.

## 2. Overview of processing

Which data do we process?	How do we obtain these data?	How long do we keep these data?	On what legal basis?
Browser and session data	Directly form the data subject through the placement of cookies.	See our cookie policy.	Your consent or our legitimate interests.
Selection and recruitment data	Through direct contact with or by the data subject	For as long as required for the processing purposes.	Your consent or our legitimate interests.
Contact and other data of suppliers			

For questions, complaints or requests regarding (the processing of) your personal data, this privacy policy and/or our cookie policy, please contact:

**VGA EUREGIO** at +32 11 281 280 or <u>info@vga-euregio.law</u>

OR

## the Data Protection Authority (DPA)

by email to <u>contact@apd-gba.be</u>, by mail (GBA, Drukpersstraat 35, 1000 Brussel) or via the following link https://www.dataprotectionauthority.be/citizen/actions/lodge-a-complaint



# 3. Which personal data do we process, for what purpose and why can we do this?

### **BROWSER AND SESSION DATA OF WEBSITE USERS**

We collect the following browser and session data by means of cookies when you use our website: the type of internet browser, user status, language preference, date and time of your visit, domain name or website through which you reached our website, number of visits, IP address, average time spent on our website and the pages visited.

What for (purposes)?	This is allowed on the basis of (legal basis):	
Technical and functional management of our website (essential and functional cookies)	Our legitimate interests, particularly the provision of a secure and well-functioning website (essential cookies)	
Evaluating the effectiveness of our website and following the use and/or surfing behaviour of its users (analytical cookies)	The consent given by you (functional, analytical, and marketing cookies).	
GOOGLE ADS		

VGA Euregio uses the services of Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ierland) for Google Ads. When you use Google Ads to access our website, after agreeing to the terms of use of the Google search engine, Google activates certain marketing cookies on our website. This is in order to register that you are visiting us after using Google Ads.

- You can find more information in our cookie policy and in the Google policy, available at this link: https://business.safetv.google/adscookies/.
- VGA Euregio is joint controller of the processing of your personal data (art.26 AVG) when these marketing cookies are activated. Google and VGA Euregio signed a joint controllership agreement, available at: https://business.safety.google/adscontrollerterms/.
- This agreement establishes that every controller, namely Google and VGA EUREGIO, will attend to the data subject requests concerning the part of the processing for which they are respectively responsible.
- The Google privacy notice with all information concerning the processing of your personal data by Google is available at: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>



#### **SELECTION AND RECRUITING DATA OF APPLICANTS**

We collect the following selection and recruitment data when one is applying to VGA Euregio via our (group)website, email and or by telephone, or other channels (campus interviews, job fairs etc.): name, address, telephone number, email address, date of birth, curriculum vitae, and other documents and/or data that candidates provide us with.

What for (purposes)?	This is allowed on the basis of (legal basis):		
Processing, managing and, where appropriate, following up on incoming applications.	Our legitimate interests, i.e., personnel management.		
	(in case you used the opt-in at our website, the legal basis is your consent)		

#### CONTACT AND OTHER DATA OF OUR SUPPLIERS

We collect the following contact and other data, among other things, from suppliers (and/or their team) when we negotiate and conclude commercial contracts with suppliers: (company) name, company form, address, telephone number, email address, VAT number and/or KBO number.

What for (purposes)?	This is allowed on the basis of (legal basis):
Using the services of our suppliers.	Our legitimate interests, in particular the use of third-party services.

# 4. Retention period

VGA Euregio does not store your personal data for longer than necessary for the processing purposes (see point 3) or as provided in our cookie policy unless VGA Euregio is required by law or court to keep the data for a longer period.

In the case of candidate applicants, we will store the personal data in our files for a maximum of 1 year in order to be able to inform the candidate applicants about any future and/or more suitable vacancies or vacancies.

# 5. Access to your personal data

VGA Euregio will treat your personal data confidentially. Unless the law or a court order imposes this on us, we will not transfer your data to third parties.

We sometimes use services and products from third parties (see below), who may gain access to (certain elements of) your personal data in order to provide their services or products. For example, for the maintenance and hosting of our website, marketing campaigns, legal software for managing clients and files, transferring legal documents and correspondence (for example, serving a summons).



VGA Euregio will conclude a processing agreement (as referred to in art.28 of the AVG) with these third parties. They hereby guarantee, among other things, that they will take the necessary technical and organizational measures to adequately protect your personal data and to only use your data in the context of and/or to realize the purposes provided for in this privacy policy.

## (Categories of) recipients within the EEA

- Vevida BV (hosting website)
- Informa Europe BVBA (IT)
- Legal Consulting Group BV (IT)
- Geecon IT Solutions (IT)
- Feagle (marketing)
- Accounting and tax consultants
- Lawyers-employees and staff of VGA Euregio and of other members of our group
- Wolters Kluwer (legal software)

### Data exchange with Google

VGA Euregio uses the services of Google Ireland Limited for Google Ads (see 3). It is possible that Google collects your data via Google Ads and exchanges this personal data with third parties within or outside the EEA. Here you will find the agreement with Google in this regard: <a href="https://business.safety.google/adscontrollerterms/sccs/eu-c2c/">https://business.safety.google/adscontrollerterms/sccs/eu-c2c/</a>

## 6. <u>Protective measures</u>

VGA Euregio takes appropriate technical and organizational measures to protect your personal data against unlawful and/or accidental destruction, damage, or loss as well as against unauthorized processing, access, or transfer.

# 7. Your rights concerning your personal data and how to exercise them

Regarding your personal data, you have the right, free of charge, to:

- Access to and inspection of your personal data and all information related to its processing;
- Correction of incomplete or inaccurate personal data;
- Deletion your personal data and limit their processing;
- Objection to all or certain purposes, in order for VGA Euregio to cease processing;
- Withdrawal of consent;
- Transfer of your personal data;
- Filing a complaint with the GBA (see 2).

## How do you exercise your right(s)?

By transferring a copy of a valid ID to VGA Euregio by e-mail at info@vga-euregio.law OR by mail to: Genkersteenweg 429 3500 Hasselt, Belgium.



If you do not wish to give us permission to process your data and/or withdraw your previous permission for this, it is possible that:

- You may not have access to (all or certain) tools on our website;
- We cannot offer you all our services;
- As a result, we will no longer be able to fulfil (all) our contractual obligations towards you.

This will not affect the lawfulness of the processing based on your previous consent.

We will implement your requests to exercise your rights as soon as possible and at the latest within 15 working days.

VGA Euregio reserves the right to change this privacy statement at any time. Important changes will be announced on our website.

For this reason, please also check our website regularly.