

## Manuchar Privacy Statement: Business relations

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## 1. Manuchar Privacy Statement: Business relations

At Manuchar, we attach great importance to the protection of the privacy of all persons from whom we collect data. We handle and secure this data with the greatest possible care, in accordance with the applicable legislation in Belgium. We make every effort to protect the personal data provided to us against loss, destruction, disclosure, unauthorised access or improper use.

In this privacy statement, we explain who we are, when and why we need your personal information, what information we collect, how and for how long we process it, to whom we can pass it on, what your rights are and how you can exercise them.

This privacy statement is intended for you when:

- you are a contact person with one of our (potential) customers, suppliers or professional service providers;
- you are a contact person at an institution (company, government, professional federation of employers or employees, school, university, partner, etc.) with which we (wish to) establish or maintain some form of contact or cooperation.

If you choose to voluntarily provide us with information, we will use that information in accordance with this privacy statement.

### 1.1. What are personal data?

The European General Data Protection Regulation of 27 April 2016 (**GDPR**) defines personal data as follows:

*all information about an identified or identifiable natural person where 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.*

If this Privacy Policy refers to personal data, reference is made to this definition from the GDPR.

### 1.2. Who are we?

The following companies (together referred to as Manuchar): Manuchar NV, LDI NV, Manuchar Steel NV, Baubur NV, Parts Trading Company NV, all with registered office at Rietschoorvelden 20, 2170 Merksem. Are each responsible for processing your personal data (Responsible for the processing within the meaning of the GDPR).

### 1.3. When do we collect your personal data?

We collect your data as soon as you provide us with your own data. This can be by e-mail, text message, orally (by telephone, during a visit to your company, at an event, training, etc.), by issuing your business card or in any other possible way. This also happens when your company or organisation registers you with us as a contact person.

We may also collect your information when it has been made publicly accessible, or when you have made it public yourself on public/social media (e.g. LinkedIn) and this would show that you are the right contact person for us to engage in conversation within the framework of our activities.

#### 1.4. Why do we need your personal data?

We collect your personal data for the purposes mentioned below and will not use this data for other purposes without informing you in advance and, if necessary, asking your consent.

We use your information to present and conduct our business activities to you or your company or organisation, to present and develop joint projects, partnerships, to represent Manuchar's interests or to provide services as a supplier or consultant.

More specifically, we will use your personal data, where appropriate:

1. to provide you with information about Manuchar's activities and to better tailor them to your needs and desires or those of your company or organisation;
2. to enter into a business relationship with you or your company or organisation, to enter into and maintain a commercial agreement and to enable its execution;
3. to exchange information with you about the products and services we offer, as well as the invoicing and accounting processing thereof;
4. to contact you for commercial offers, newsletters, events, workshops and other Manuchar promotions/marketing campaigns that may be of interest to you;
5. to be able to contact you in your capacity at a public institution (government, university, professional federation, etc.) in order to represent the interests of Manuchar;
6. to monitor and measure the quality of our services. To this end, we or a third party designated by us may ask you to participate in surveys and use and process the information obtained to improve the quality of our services;
7. to ensure operational safety.
8. to meet management objectives including providing management information, conducting internal controls to prevent fraud and conducting (internal/external) audits;
9. to allow you to exercise your rights and to demonstrate in retrospect that we have exercised these rights.

We use and process your personal data, depending on the type of processing, on the basis of:

1. **our (pre)contractual relationship and all Manuchar's legal obligations in connection therewith:** when we negotiate or enter into an agreement with you or with your company or organisation, we need a certain amount of information from you or the persons involved in your company or organisation in order to be able to submit and discuss an appropriate offer, to be able to prepare, draw up and then properly execute that agreement. If you do not want your personal data to be processed in this context, it is not possible for us to enter into, or provide, the service.
2. **the legitimate interest of Manuchar or of a third party:** if necessary, we will use your data to accommodate the legitimate interests of Manuchar or of third parties. This may include, for example, the provision and promotion of all services and/or informative messages that are in line with what you may reasonably expect to receive from us in the context of our existing or potential future relationship. This can also be done for access checks or internal checks and audits to ensure the safety and continuity of our systems and companies. This legitimate interest is also present when we have to keep your records in the context of instituting, exercising or substantiating a possible legal claim.

### **1.5. Which personal data do we process?**

In the first instance, we process your personal data that are necessary to enable the correct execution of our business activity: your surname and first name, your position (title), your professional address and your professional contact details (telephone or mobile phone number and/or e-mail address). Additional information (e.g. preferred language, work department) is not always necessary but may be desirable in the context of the development of our business relationship or in order to better tailor our services and commercial actions to your interests, wishes and needs.

Other data are completely optional and are solely intended to maintain a good personal relationship with you (e.g. date of your birthday, your hobbies). If you choose to share this type of personal information with us, we can process it in our database.

You are advised to notify us of any changes to your personal data as soon as possible.

### **1.6. With whom do we share your personal data?**

Manuchar may transfer certain of your personal data only if necessary for the purposes set out in point 1.3, for the performance of the agreement existing between us, for the performance of a legal obligation (of Manuchar or of a third party) or for the protection of a legitimate interest (of Manuchar or of a third party):

1. to all other companies of the Manuchar Group in Belgium, for example:
  - the achievement of the objectives of our business relationship;
  - internal services (administrative tasks, service vouchers, invoicing, customer and supplier accounting, debtor management, etc.);
  - promotions and marketing campaigns in the context of our services;
  - management information;
  - internal audits;
  - internal services;
  - screening of persons under the relevant legislation on financial sanctions;
2. to Manuchar's subcontractors and suppliers, for inter alia:
  - the provision of services or the performance of tasks and orders in the name and on behalf of Manuchar (e.g. IT providers, cloud providers, investigation offices, access security);
3. to our company auditors, audit and certification offices, for among others:
  - audit of our annual accounts;
  - obtaining and retaining certain certificates;
  - audit of subsidy files;
4. to various government bodies in the context of inspections and investigations, including, among others:
  - federal and regional inspectorates and accreditation bodies;
  - social security bodies;

- tax authorities;
5. to all other third parties where we are required to do so by law, court order or judgment.

Manuchar does not sell, rent or make your personal information available commercially to third parties.

In developing Manuchar's business, Manuchar may sell activities or assets. In the event of a sale, merger, reorganisation, dissolution or similar event, your personal data and other information may form part of the transferred assets.

When our suppliers process your personal data on Manuchar's behalf, they act as processors as defined in the GDPR. We do everything in our power to ensure that they adequately protect your personal data.

In certain exceptional cases, your personal data may be transferred outside Belgium and outside the European Union. Manuchar takes the necessary contractual and technical security measures to ensure that all personal data transferred are adequately protected against loss or unlawful processing. For further questions about this, please contact Manuchar's legal department.

#### **1.7. How long do we store your personal data?**

Your personal data will be retained for the time necessary to fulfil the purposes described under point 1.3 and to comply with our legal obligations.

#### **1.8. Security measures?**

Manuchar does everything in its power to protect your personal data optimally against unlawful use. We do this by means of physical, administrative and technological measures.

For example: only authorised persons can access our office and our systems and access is limited to the systems they need for professional reasons. These individuals must know and apply our internal privacy and data protection policies correctly. To the extent that data is passed on to third parties, Manuchar agrees with these third parties that they also provide optimum protection of personal data.

#### **1.9. What are your rights?**

Manuchar processes your personal data in accordance with the provisions of this privacy statement. As a party involved, you have a number of rights that you can exercise at any time.

You can exercise the following rights:

- **right to object**  
You can object to the processing of your personal data. This can only be done against a processing that is done on the basis of the legitimate interests of Manuchar or a third party (see above in point 1.3). In exercising this right, you will have to indicate exactly which processing you object to and for which specific reasons. This is necessary to be able to weigh up the interests correctly. You can easily object to the use of your e-mail address for Manuchar newsletters, promotions and marketing campaigns. In every e-mail you receive from us in this connection, you always have the opportunity to unsubscribe.
- **right of inspection**  
You can ask whether or not your personal data will be processed.

If this is the case, you may access those personal data and request the following

information: the processing purposes, the categories of personal data we hold about you, the categories of recipients (third countries or international organisations), the retention periods or the criteria to determine them, your other rights, other sources of origin of your data and the existence of automated decision-making. In providing this information, we must always consider the rights and freedoms of other persons.

- **right to rectification (correction and supplementation)**  
You may ask to correct or supplement any (personal) data that you consider to be incorrect or incomplete. When exercising this right, you will have to indicate exactly which data you want to correct or supplement.
- **right to transferability**  
You have the right to have the personal data that you have provided to Manuchar yourself transferred by Manuchar in electronic form to yourself (via your e-mail address that you provide) or to any other person designated by you (via their e-mail address that you provide).
- **right to erasure (right to be forgotten)**  
In the cases provided for by the GDPR, we will delete your personal data at your request.
- **right to restriction of processing**  
You have the right to restrict the processing of your personal data when:
  - You contest the accuracy of your personal data (for the duration of Manuchar's check).
  - the processing of your personal data by Manuchar would be unlawful but you still do not wish to invoke your right to delete data.
  - you have objected to the processing of certain of your personal data (for as long as interests are being weighed up).

In principle, you can exercise your rights free of charge. You do this by informing us by e-mail at [be.legal@manuchar.com](mailto:be.legal@manuchar.com).

At the latest within a month of receiving your e-mail, we will inform you in writing how we have dealt with your request. Depending on the difficulty of your request or the number of requests we receive from other persons, this period can be extended by two months. In this case, we will inform you within one month of receiving your e-mail about this extension. In some cases (e.g. legal obligations, rights of other persons or limitation periods) you will not or not fully be able to exercise your rights. You will then receive a message about this with the reasons why we cannot, or cannot fully, comply with your request.

#### **1.10. Cookies**

On our websites, we use cookies and web statistics. We do this to see how visitors use our website. This information helps us to improve the site. A cookie is a file that is stored on your computer. These cookies can be recognised when you visit our website again. You can read more about this in our Cookie Policy on our website.

#### **1.11. Questions, remarks, complaints and data leaks**

If you have any questions, comments or complaints about the protection of your personal data by Manuchar or about this privacy statement, please contact the Legal Department of Manuchar at [be.legal@manuchar.com](mailto:be.legal@manuchar.com).

You also have the right to complain to the Data Protection Authority (DPA) at the following address: Rue de la Presse 35, 1000 Brussels.

If you are aware of or suspect a data breach, please report this to us immediately via [it@support.com](mailto:it@support.com).

### **1.12.Changes**

Manuchar may make improvements, additions or changes to this privacy statement for various reasons. The most current version can be viewed at any time on our website. This version was created in August 2018.