

**PEPITE S.A.**  
**Privacy Policy**

(LAST UPDATED: **20 October 2018**)

**1. Purpose of this policy**

1.1 Information

This policy informs You (in your capacity of “data subject”) about our processing of your data, in our capacity of Controller, in compliance with all applicable personal data protection and privacy laws and regulations (hereunder referred to as the “Data Protection Law”), and more particularly and amongst others, pursuant to article 13 and 14 of the General Data Protection Regulation (EU) 2016/679 (or “GDPR”).

1.2 Informed consent

In some cases (specified below), the legal basis of our data processing is your informed consent. In such cases, this policy’s other purpose is to provide you with the necessary information to get a valid consent from you.

Where our personal data processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. To withdraw your consent, you are invited to use the easy opt out mechanisms that are provided in our communication tools or to send us an email (at the address indicated below).

Where our personal data processing is based on your consent, it is our duty to be able to demonstrate that you consented to the processing of your personal data. Therefore, we keep data as regards pertaining to your consent as long as we have the obligation to demonstrate our full compliance with Data Protection Laws.

If you are less than 16 years old, it is our duty make reasonable efforts to verify in such cases that consent is given or authorized by the holder of parental responsibility over the child, taking into consideration available technology. This explains why we may ask further information on such holder of parental responsibility.

**2. Information on the data controller**

**Controller’s Identity:** PEPITE S.A., incorporated under Belgian law, with registered address at 4/1 rue Forgeur, 4000 LIEGE (Belgique), registered with the Belgian Commercial Register (BCE) under n° 0478.472.789, and with email address (for any privacy issue) [privacy@PEPITE.be](mailto:privacy@PEPITE.be) (hereafter referred to as “PEPITE” or “we”).

### 3. Information on the different personal data processing activities

In this section 3 we provide information on:

- the **purposes** of the data processing (why do we process your data);
- the **legal basis** for the processing (what justifies the processing); when this legal basis is an legitimate interest, we mention the nature of the latter;
- the **categories of personal data** concerned;
- the **categories of recipients** of the personal data, if any;
- where applicable, the personal data transfers to recipients in **countries outside EU** or to international organizations, and the safeguards provided by the controller in such case;
- the **period** for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;

In order to be as transparent and clear as possible, this information is presented in the table below, and is provided per category of data subject:

CONSERVED PERSONS (and associated natural persons)	PURPOSES	CATEGORIES OF DATA	SOURCES	RECIPIENTS (other than PEPITE's employees and subcontractors) <sup>4</sup>	RETENTION PERIOD	LEGAL BASIS	TRANSFER OUTSIDE EU
customers	<b>public relations</b> and customer information (information, complaints, after-sales service).	identification <sup>1</sup> electronic identification <sup>2</sup> communication content business information description of the complaint	data subjects	none <sup>4</sup>	duration of the interaction (more if data used in other processing operations mentioned below)	GDPR, art.6, §1 a) (consent) GDPR, art.6, §1 c) (compliance with legal and regulatory obligations)	yes <sup>5</sup>
customers	<b>customer management</b>	identification <sup>1</sup> electronic identification <sup>2</sup> administrative data <sup>3</sup>	data subjects, official	commercial delegates	10 years after the end of the processing	GDPR, art.6, §1 b) (performance of contractual or pre-contractual	yes <sup>5</sup>

	(order tracking and fulfillment, sales information, invoicing).	segmented data customer code function category language money financial characteristics representative transport communication content business information	databases, commercial (public) databases	distributors and commercial intermediaries public administrations	(usually the end of the contract)	obligations) GDPR, art.6, §1 c) (compliance with legal and regulatory obligations)	
customers and users of websites and PEPITE platforms	<b>Provision and security of IT services</b>	identification <sup>1</sup> electronic identification <sup>2</sup> IT system identifiers login data	data subjects,	organisation (employer) of the person concerned	duration of the service	GDPR, art.6, §1 b) (performance of contractual or pre-contractual obligations)	yes <sup>5</sup>
leads	<b>general prospecting</b>	identification <sup>1</sup> electronic identification <sup>2</sup> administrative data <sup>3</sup> function category language motto financial characteristics representative communication content business information	data subjects, official databases, commercial (public) databases	commercial delegates distributors and commercial intermediaries	indefinite (normal lead management time)	GDPR, art.6, §1, f) (legitimate interest: prospecting of professional customers, development of economic activities)	yes <sup>5</sup>
customers and prospects	<b>marketing</b>	identification <sup>1</sup> electronic identification <sup>2</sup>	data subjects, data provider	none <sup>4</sup>	duration of consent	GDPR, art.6, §1 a) (consent)	yes <sup>5</sup>
vendors	<b>supplier management</b> (selection, order tracking, accounting and administration, quality controls)	identification <sup>1</sup> electronic identification <sup>2</sup> administrative data <sup>3</sup> communication content	data subjects, official databases, commercial (public) databases	public administrations	10 years after the end of the processing (usually the end of the contract)	GDPR, art.6, §1 b) (performance of contractual or pre-contractual obligations) GDPR, art.6, §1 c) (compliance with legal and regulatory obligations) GDPR, art.6, §1, f) (legitimate interest: selection and management of suppliers, quality controls, process improvement, protection of PEPITE)	yes <sup>5</sup>

						rights)	
job candidates	<b>recruitment</b>	identification <sup>1</sup> electronic identification <sup>2</sup> family composition leisure activities education professional data CV data	data subjects	none <sup>4</sup>	recruitment period *  * one more year with the consent of the person concerned.	GDPR, art.6, §1 b) (performance of contractual or pre-contractual obligations)  GDPR, art.6, §1 a) (consent for subsequent storage)	no
office visitors at PEPITE (visitor register)	<b>security</b>	identification <sup>1</sup> name of the employer visit data (arrival and departure times)	data subjects	none <sup>4</sup>	30 days	GDPR, art.6, §1, c) (compliance with legal and regulatory obligations) GDPR, art.6, §1, f) (legitimate interest: protection of the company, its property and its staff)	no

<sup>1</sup> "**Identification**" data includes: first name, last name, physical address and telephone number.

<sup>2</sup> "**Electronic identification**" data includes the email address (and possibly identifiers on the Internet or social networks)

<sup>3</sup> "**Administrative data**" is all data necessary for tax and accounting purposes (VAT, registration number, JNL codes,...).

<sup>4</sup> The data shall at least be made accessible to PEPITE's staff and processors (access rules shall be established so that only those persons who need it in the course of their work have access to the data). "**None**" means that the data is not disclosed to any other person or entity.

<sup>5</sup> Where appropriate or necessary for the purposes announced, data are shared with technical partners, commercial intermediaries or PEPITE's employees who may be located outside the European Union (in the following countries, which are not subject to an adequacy decision issued by the European Commission: USA, Canada, Colombia, Peru, Chile, Brazil and Japan). Transfers are covered by standard contractual clauses signed with the recipients (and kept at PEPITE's head office).

#### 4. Your rights as a data subject

The applicable Data Protection Law grants you some rights, on certain grounds, and subject to certain conditions, including the rights to access, correct, object to the use of, or request the deletion or portability of Personal Data, as well as to ask a restriction of processing.

Please contact us as set out in the "Who to Contact About Your Personal Data" section below with any requests to exercise your rights or if you have any questions or concerns about how we process Personal Data.

Please note that some Personal Data may be exempt from access, correction, objection, deletion, restriction and/or portability rights in accordance with the applicable Data Protection Law or other laws.

## 5. Security

PEPITE will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Data you might have with us has been compromised), please immediately notify us. See the "Who to Contact About Your Personal Data" section below.

When PEPITE provides Personal Data to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Data.

## 6. Complaints

If you are not happy with our processing of your Personal Data and if you feel that contacting us could not solve the issue, the applicable Data Protection Law provides you with a right to lodge a complaint with the competent supervisory authority (more information is available on its website : <https://www.autoriteprotectiondonnees.be/>).

## 7. Who to contact about your Personal Data

If you have any questions about our use of your Personal Data you can

- send us an e-mail at this address: **privacy@pepите.be**,
- or write to the following mailing address: **PEPITE S.A.**  
4/1 rue Forgeur  
4000 LIEGE (Belgique)

## 8. Changes to This Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements.

To inform you of the changes, we will place updates on our website. In some cases, we can also warn you per email.

Please take a look at the "LAST UPDATED" date at the top of this Privacy Policy to see when it was last revised.