

## **PRIVACY POLICY**

### **Data processing and responsibility**

POLYTRA NV, Potvlietlaan 7, 2600 Berchem (België) is the entity responsible for processing your personal data. Any questions you may have on this matter can be sent to us by mail at the above address or by email at the following address:: gdpr@polytra.be.

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

Personal data is all data relating to an identified or an identifiable natural person. A natural person is regarded as identifiable when this person can be identified directly or indirectly with reference to information such as a name, an identifying number, location details, online details or one or more elements that are characteristic of the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

Sensitive personal data is personal data relating to a natural person from which his/her race, ethnic background, political affiliation, religious or philosophical convictions, union membership, health, sexual conduct, sexual preferences, genetic and biometric details are apparent, solely and only with the object of identifying the person

Processing means a treatment or a set of treatments relating to personal data or a set of personal data, whether performed in automated procedures or otherwise, such as the collection, recording, ordering, structuring, storage, updating or amending, requesting, consulting, provision by means of transmission, distribution or any other way of making such available, aligning or combining, blocking, deletion or destruction of data.

### **For what purposes and on what basis do we use the data that you provide?**

We use the personal data that you send to us for a variety of purposes, such as:

- Administering our contractual relationship and the associated services (e.g. using your telephone number to inform you about completion of entrusted orders);
- For uses that you have specifically agreed to (e.g. governed by contract, SLA,...);
- To perform statistical analyses (e.g. using anonymous data to determine and analyse the frequency of online visits);
- To comply with mandatory legal or regulatory obligations we are required to meet;
- When we have a legitimate interest in doing so, such as in preventing and fighting fraud. In this case, we balance this interest alongside our efforts to respect your privacy;
- Rendering the data pseudo anonymous, with no relation to your personal data, for commercial purposes.

We may sometimes need to transfer your data to other companies within our corporate group (sister companies, subsidiaries, e.g. Fracht Group AG) for the above purposes.

We will not transfer it to third parties, except:

- When we are legally required to do so;
- When we are legally authorised to do so;
- To subcontractors, when this is needed to perform our services;
- To keep it up to date;
- When you provide prior consent.

## **How do we protect your data and how long do we store it?**

We take every technical and organisational measure needed to protect your personal data.

Your data is stored for the time needed to process it for the purposes for which it was collected, which varies according to the purpose of its collection.

At the end of these storage periods, personal data is deleted or rendered anonymous or unusable.

## **What are your rights?**

You have the following rights with regard to the personal data that we collect/that you provide us:

### *Right to access and transfer data:*

You have the right to access all personal data concerning you. You have the right to receive confirmation as to whether your personal data is or is not being processed, and to be informed of the purposes for which we process it, the type of data that is processed, the persons and entities who receive the data, and how long your data is stored.

You also have the right to receive a copy of the personal data that you have provided, and to send it, or ask us to send it, to another entity responsible for processing personal data.

### *Right to correct/delete data – Right to be forgotten:*

You have the right to ask for data concerning you to be corrected if you realise that it is inaccurate or incomplete. You also have the right to ask for your personal data to be deleted if it is no longer necessary for the purposes for which it was collected.

If you gave us permission to process your personal data, you have the right to withdraw this permission at any time.

### *Right to object to the processing data for marketing purposes:*

You have the right to refuse for your data to be processed for direct marketing or prospecting purposes. No reason need to be provided if you decide to refuse.

### *Right to limit data processing:*

You have the right to require us to limit the processing of your data: (i) when you contest the accuracy of the data; (ii) when you object to the data being deleted and demand instead that it be used in a limited fashion; or (iii) when we no longer need to process your data, but you still require it for the purposes of establishing, exercising, or defending legal claims.

### *Right to file a complaint with the Oversight Authority:*

You may, if you choose, file a complaint concerning the processing of your data with the Data Protection Authority at the following address:

Data Protection Authority  
Rue de la Presse 35  
B-1000 Brussels

[contact@apd-gba.be](mailto:contact@apd-gba.be)

Phone : +32 (0)2 274 48 00