

1. Introduction

Protecting privacy and personal data (“PD”) is a major issue for Econocom.

Econocom processes PD in compliance with the legislation that applies to data protection generally and in particular with the General Data Protection Regulation (“GDPR”)¹.

This privacy charter sets out details for you regarding the undertakings that Econocom makes when personal data relating to you is collected via the Econocom Website (“Website”) and the use that Econocom makes of that data.

2. Identity and details of the personal data controller

The personal data controller is: ECONOCOM MANAGED SERVICES NV (“Econocom”), Bastion Tower, Marsveldplein 5 B14 in 1050 Brussels, company n°: 0432 093 428.

3. Personal data that may be collected via the Website

Personal data (PD) is data that you share with Econocom in the context of making a purchase online, calling on our aftersales service, or lodging a complaint. PD is also data provided when creating or activating your account. It may also be PD that you pass on to us when giving us your opinion about our products and services. We collect and process data when you browse our Website (see Policy on Cookies).

Some DP is collected automatically as the result of your activity on the Website.

Examples of the data collected include: surname, first name, postal address, e-mail, telephone number, gender, date of birth, order history, history of records associated with aftersales service, requests for refunds of the difference, products viewed and browsing data on the Website.

4. Legal basis for processing

Econocom collects and processes your PD for specific legitimate purposes. The processing of your PD is carried out mainly in the context of the sales contract entered into between you and Econocom.

Some processing is then carried out to meet legitimate interests, based on your consent or for legal obligations (for example: our fiscal or accounting obligations).

Your PD is processed for the following purposes:

¹ REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL dated 27th April 2016 relative to the protection of natural persons with regard to the processing of personal data and the free circulation of this data, repealing directive 95/46/EC (general data protection regulation)

- To manage your orders and provide you with the services that you have requested, such as the home delivery of your order, the preparation of your order and/or the collection of your order from a pick-up point.
- To manage your requests made to the aftersales service, such as the repair of a product or the call-out of a technician for a repair.
- To send you information (you can, of course, object at any time to the sending of e-mails of a commercial nature by sending us your request to the following address: privacy_be@econocom.com):
 - As the result of placing an order or in the context of tracking a contract by way of information messages (order confirmation, information about the delivery time, information about the expiry of your contract, etc.).
 - To gather your opinion about our services and the products that you have purchased.
 - To provide you with advice and propose products associated with your purchase.
 - To propose products and services to you that are likely to interest you.
 - To send you information following a visit to our Website.
 - To keep you informed of new products and services and to tell you about interesting products.
- To personalise and improve our services and the way we communicate with you. We use your data to get to know your requirements better and to target certain messages that we send to you, so that they can be as relevant as possible. In this way we are able, for example, to use your browsing or purchasing history to offer you products that are likely to interest you. In the event of you contacting us on (***), the conversation may be recorded for training purposes, the aim being to teach our staff to meet the expectations of our customers better.
- To create and manage your account. This PD will be used to facilitate browsing on our websites and your online orders by pre-completing your PD in the order form.
- To carry out surveys. We may use your data by making it anonymous in order to generate statistics and reports regarding the use of our services and the sale of our products.

5. Non-personal information collected automatically

Econocom is committed to maintaining the confidential nature of the identity of visitors to the Website.

Econocom may provide overall statistics about visitors to the Website, as well as data analysing their profile and other information to third parties in relation to the Website. Under no circumstances will these statistics contain information enabling individuals to be identified.

6. Minors

No information may be provided to Econocom by persons under the age of 16 without the prior consent of a parent or legal representative.

7. Security

Econocom has implemented the technical and organisational measures required to prevent any unauthorised access, incorrect use, disclosure, unauthorised modification, illegal destruction or accidental loss of your PD.

However, the fact of providing PD (either directly on the Website, by telephone or online) is never without risk and electronic communication systems can never be totally protected against “sabotage” or “hacking”.

The Internet is an open and unsecured system. Econocom cannot be held liable for the security of any PD transmitted.

8. Retention of personal data

Econocom will only retain your PD insofar as such retention is necessary for the purpose of the data processing carried out. This takes account of the need to answer questions or resolve difficulties, improve or offer new services and to comply with Econocom’s statutory obligations (for example regarding the retention of accounting records and legal documents).

This means that Econocom will keep your PD for a reasonable period of time after processing, in line with the statutory and regulatory obligations that apply to Econocom (for example regarding the retention of accounting records and legal documents) and to provide sufficient time to settle disputes and to exercise or defend the rights that Econocom has in the countries where it is located.

Once the PD that we collect is no longer required, Econocom will destroy or delete it securely.

9. Recipients of your personal data

Econocom may share your PD with third parties in order to subcontract services:

- With partners who provide services on our behalf and under our express instructions. For example a delivery service to make deliveries or expedite orders, or a repair workshop to repair defective device.
- For our marketing campaigns we use external service-providers to which we pass on your personal data in particular for sending out e-mails and addressed mail, to carry out analyses that help us to better understand our customers and their habits (e.g. Google, Facebook) or to send you personalised advertising material via external platforms (e.g. Google, Facebook, Instagram).
- To suppliers of products that we sell in the context of a product recall or important notice relating to the product.
- In the context of a purchase made on our Website, your data is passed on to our partner so that it can deliver the product ordered to you.

In view of the international dimension of the Econocom Group, the PD collected by Econocom may be retained and processed in, or transferred between, any country in which the Econocom group has a business. However, Econocom only grants access to your PS between Econocom Group subsidiaries if it is necessary.

Should PD be transferred to countries outside the European Economic Area (EEA) that do not provide an adequate level of protection, we will ensure that the transfers take place with service-providers governed by binding corporate rules acknowledged to provide an appropriate level of protection, or that an *ad hoc* contract for the transfer of data, based on the model set by the European Commission, is signed between Econocom and this service-provider prior to the commencement of the transfer.

10. Exercising your rights

You have a right to access your PD at any time. You also have the right to request its rectification and erasure, the right to restrict processing, the right to object to processing and the right to portability on the terms stated in the applicable regulations.

If you have any questions about our Privacy Charter or wish to exercise your rights, simply send us your request to the following address: privacy_be@econocom.com detailing the subject of your request and attaching a copy of your identity card. This will be used solely by Econocom to implement the rights being exercised.

Finally, you have the right to lodge a complaint with the Data Protection Authority (www.autoriteprotectiondonnees.be) responsible for enforcing compliance with PD obligations.

11. Declaration of confidentiality

Reference is made to the [Privacy Charter](#) as well as to the [Cookies Policy](#) available on this Website.

12. Cookies and the Website

Econocom uses cookies to gather information. A cookie is a small data file that is recorded on your computer's hard disk.

This standard technology, which enables us to record certain items of information about the user (choice of language, pages visited, length of visit, password and login for your future visits, etc.), helps us to personalise and enhance your browsing on our Website.

You can change the settings on your Internet browser (Firefox, Safari, Explorer, Chrome, etc.) at any time to block or filter the installation of these cookies. However, the result may be that Econocom is no longer able to take notice of your browsing preferences (e.g. the language of the site) or that certain of the site's functionalities can no longer be accessed.

Some cookies are **essential** for the technical functioning of the site. Cookies may also be **technical**, for example when they remember the language you chose for your previous visit (which means you don't have to provide this information again). We also use **tracking cookies** which enables us to generate statistics and analyse use of the site by visitors, as well as to improve quality and content. Some cookies are installed by third parties under their own responsibility.

You will find more information about our Cookies Policy [here](#) (link to be added)

12. Social networks

Econocom uses social network (Facebook, Twitter, etc.) to pass on information to you. You can also use this channel to contact Econocom. Econocom will then use your data to answer your question, respond to your comment or deal with your complaint.

The general terms and conditions of the providers of these social networks apply. By using these services you accept these conditions. You will find more information on their platforms about the way these service-providers use your data. Econocom is not responsible for the processing of your PD by these service-providers.

Econocom uses the services of social networks to send messages of a commercial nature to its customers and to an audience with a profile that is similar to its customers. To do so, Econocom complies with the terms and conditions of the social network platforms that you have accepted. Econocom monitors the information published about it on social networks and retains this data. Data that you have posted about Econocom may be retained in this context. Econocom will not publish photos of you on social networks if you are not aware of such publication and have not given your consent. Finally, the social networks may also be used to contact you as part of recruitment campaigns, to have access to your PD when you allow it.

13. Modifications

Econocom reserves the right to modify this Charter, as well as to modify or cancel access to this site. Econocom may also modify its content at any time, with or without notice.