

# Privacy Policy

Version 1.0

Date: 19 September 2022

## **1. General information**

**Compound C**, limited liability company (*besloten vennootschap*), with offices at Belgium, Sasstraat 20, 8630 Veurne, registered with the Belgian Crossroad Bank for Enterprise under company number 0790.760.925, respects your privacy and strives to always treat your personal data with the necessary care and confidentiality. We hereby undertake to always comply with the General Data Protection Regulation ("GDPR") and other applicable regulations.

For further questions or remarks in connection with the way we handle your personal data, you can always contact us, either by e-mail to [info@compoundc.eu](mailto:info@compoundc.eu) or by letter to the address of our offices.

## **2. What is the scope of application of this Privacy Policy?**

This Privacy Policy is only applicable when Compound C is in charge of the processing of your personal data. This means that Compound C acts as data controller and determines why and how your data is being processed.

‘Processing’ means any kind of data processing that could identify you as a natural person. Which specific data this may concern, will be explained in detail below. The concept of ‘processing’ is broad and includes for example the collection, storage, disclosure and distribution of your data.

This Privacy Policy is applicable on the processing of personal data by Compound C from the categories of persons mentioned hereunder. For reasons of transparency and clarity, we will keep distinguishing between these categories of persons throughout the Privacy Policy, where relevant. Which data we process from you, the purposes for which we process your data, and other relevant elements are after all dependent on your relationship with Compound C. The categories include persons who belonged to these categories in the past (e.g. former customers), and persons who may belong to these categories in the future (e.g. potential customers).

- visitors of our public website;
- customers of our platform, content and user forum;
- our business partners, that assist us in operating our activities.

If one of the persons referred to above is a legal person, we still process data from our contact persons at these entities and the GDPR applies.

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

Below we clarify what personal data we may process from you. Depending on the specific situation, your preferences and the way in which you contact us, we may not process all of the data below.

### **General**

From all our contacts we may process the data below:

Type of data	Examples (non-exhaustive)
<b>If we use cookies: electronic identification and usage data (related to our own website)</b>	IP address, browser type, location data, by which route you arrived at our website, the type of device you use to visit our website, the web pages visited, the way you navigate on the web pages visited. This data is processed mainly using cookies.
<b>Identification data</b>	Information to verify your identity if you wish to exercise any of your rights as a data subject under the GDPR).
<b>Contact details and history</b>	Name, first name, address, email address, phone number, communications sent and received (e.g., email messages, messages sent via the contact form on our website, letters, etc.).

#### **Customers and business partners**

From (contact persons of) our customers and business partners we may additionally process the following data:

Type of data	Examples (non-exhaustive)
<b>Contact details and history</b>	See above.
<b>Communication data on our forum</b>	Forum messages and attachments thereto.
<b>Payment and billing information</b>	Payment card details, bank account number, if you make payments to us or receive payments from us.
<b>Information regarding professional experience and fields of interest</b>	Job function, experience level, fields of interest regarding specific courses
<b>Country of residence</b>	-
<b>Feedback</b>	Any feedback you may have, as a customer or our business partner.

## **4. For what purposes and on what legal grounds do we process personal data?**

We only process your personal data for legitimate purposes that are part of our organisation's activities. The processing is always based on the legal grounds listed in the GDPR.

#### **General**

The processing steps below are potentially relevant to all of our contacts.

Processing purpose	Legal basis
Answering your question when you contact us, should this not be (or no longer be) part of an existing, former or potential future relationship with you as our customer or business partner.	Legitimate interest

Promoting our activities, by using your contact information to send newsletters or other marketing materials	Consent
	Legitimate interest, if possible, after consideration.
If we use cookies: to provide a website that functions properly on a technical level by using strictly necessary cookies, so that we can provide you with a safe and well-functioning website.	Legitimate interest
If we use cookies: the use of analytical cookies on our website to understand how you use our website, for the purpose of, among other things, detecting navigation problems, and making the website more user-friendly and attractive.	Consent
Fulfilling our legal obligations as an organisation, such as data protection and tax/accounting obligations.	Legal obligation
To ensure the possibility of exercising or defending the interests of Compound C in court, and to actually do so, if we believe that our interests are being harmed and legal proceedings are imminent, or if legal action should be taken against us by a person who feels aggrieved by us.	Legitimate interest

#### **Customers and business partners**

From our business partners we process the personal data additionally for the following purposes:

Processing purpose	Legal basis
Entering into, performing or terminating the specific agreement with you as our customer or business partner (i.e. providing access to our platform, our content and our user forum), fulfilling our pre-contractual obligations, managing our customer relationship or relationship as business partners, communicating with you, paying the amounts we owe you as your business partner, or invoicing and collecting the amounts you owe us as a result of the cooperation.	Necessity for the formation or performance of a contract.
	Legitimate interest (for contacts at our business partner who are not a party to the contract)
Promoting our activities, by using your <b>job function, experience level, fields of interest regarding specific courses and country of residence for marketing purposes</b>	Legitimate interest

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

### **General**

We will not transfer your data to third parties, unless this is necessary for achieving one of the aforementioned purposes, you give your consent for such transfer, or we are required to do so by law.

Where necessary we engage external service providers, so called “data processors”, to support our operational purposes such as providing our services, managing our IT systems or performing any other (internal) business processes such as the digital storage of our customer files. These external service providers may perform certain processing activities on your data on our behalf. We will only share your data with these external service providers to the extent necessary for the relevant purpose. The data may not be used for any other purposes by these third parties. In addition, these service providers are contractually bound to ensure the confidentiality of your data by means of a so-called “data processing agreement” concluded with these parties.

#### **Identification of categories of recipients**

Specifically, this means that we share your data, to the extent relevant in your situation, with the following third parties for the following purposes, with these third parties in certain cases acting as processors on our behalf:

Potential category of recipients of your data	Legal basis
<p>The processors who assist us in operating our activities, such as:</p> <ul style="list-style-type: none"> <li>- Cloud services</li> <li>- Payment service providers</li> </ul>	<p>Necessity for the conclusion or performance of a contract, if you are our customer or our business partner.</p> <p>Legitimate interest if no (direct) contract between us applies.</p> <p>Your consent where relevant, e.g. when subscribing to the newsletter.</p>
Governmental bodies, judicial authorities and practitioners of regulated professions such as auditors, accountants and lawyers, for the purpose of fulfilling our legal obligations as a company, and the efficient defense of our interests in the context of any legal dispute, for the data strictly necessary for this purpose.	<p>Legal obligation if the transfer is in line with a legal obligation or government order.</p> <p>Legitimate interest for any other transfer</p>

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

We do not store your data for longer than is necessary in order to achieve the purpose for which the data has been collected or processed, as specified above.

Since the period for which the data can be stored depends on the purposes for which the data has been collected, the storage period will vary according to the individual situation. Sometimes specific

legislation will require that we store certain data for a certain period. Our retention periods for personal data are based on legal requirements and balancing your rights and expectations against what is useful and necessary to provide our services, or allow you to provide your services to us.

When it is no longer necessary to process your data, we will delete or anonymize your data. If this is not (technically) possible, for example because your data is stored in backup archives, then we will retain your data, but we will not further process it and will remove it when this becomes possible.

## **7. From whom do we obtain your personal data?**

As a customer or business partner, we mainly obtain your personal data directly from you. However, we cannot rule out obtaining certain of your personal data indirectly in specific circumstances, from public sources or from third parties.

We may also obtain personal data indirectly from our customers or business partners.

For example we may obtain your personal data indirectly from public sources. This mainly concerns limited data about your organisation that is publicly available, such as on the website of your organisation, or in the company register of your country.

In the event we obtain your data indirectly, we will inform you about the processing of your data no later than at the time of our first contact with you.

## **8. Where do we store your personal data and how do we protect it?**

Your personal data is mainly stored externally with specialised third parties, such as the external service providers we engage for hosting our website. We try to engage external service providers that are based inside the European Economic Area (EEA).

However, it is possible that your personal data is transferred outside the EEA. As a result, your personal data may be transferred outside the countries where we and you are located. This includes to third countries outside the EEA and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully.

Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses or your explicit consent that will be requested before transferring your personal data outside of the EEA.

In any case, we and our processors have taken the necessary technical and organizational measures with a view to protecting your data against loss or any form of unlawful processing.

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

You have several rights concerning the personal data we process about you. If you wish to exercise any of the rights set out below, please contact us using the contact details provided in the first heading of this Privacy Policy.

**Right of access and copy**

You have the right to access your data and to obtain a copy thereof. This right also includes the possibility of requesting further information on the processing of your data, including on the categories of data processed about you and for what purposes.

**Right to rectification**

You have the right to have your data amended if you believe we have incorrect data.

**Right to erasure (right to be forgotten)**

You have the right to request that we delete your data without unreasonable delay. However, we will not always be able to comply with such a request, including when we still need the data in function of a current contractual relationship, or when the retention of certain data for a certain period is required by law.

**Right to restriction of processing**

You have the right to restrict the processing of your data. In this way, the processing is temporarily stopped until, for example, there is certainty about its accuracy.

**Right to withdraw your consent**

Where processing is based on your consent, you have the right to withdraw this consent at any time by contacting us. For marketing messages you receive from us via email based on your consent, you can easily withdraw this consent by clicking 'Unsubscribe' at the bottom of each such message.

**Right to object**

You have the right to object to the processing of your data based on our legitimate interests. This should be based on reasons specific to your situation. In this case, we must stop processing unless we provide compelling legitimate grounds to continue processing.

However, you can always object to the use of your data for direct marketing purposes, after which we are obliged to stop the processing for these purposes.

**Right to data portability**

You have the right to obtain your data, which you have provided to us yourself, in electronic form. In this way, they can be easily transferred to another organization. You also have the right to request us to transfer your data directly to another organization, if this is technically possible.

**Right to complain to your supervisory authority**

If you believe that we are improperly processing your data, you always have the right to lodge a complaint with your data protection supervisory authority. You can do this with the supervisory authority of the EEA member state where you usually reside, where you have your place of work or where the alleged infringement has taken place. Since we manage and coordinate the project activities primarily from Belgium, please refer below to the contact details of the Belgian Data Protection Authority.

Belgian Data Protection Authority (GBA)

Drukpersstraat 35

1000 Brussels

+32 (0)2 274 48 00

[contact@apd-gba.be](mailto:contact@apd-gba.be)  
[Website GBA - filing a complaint](#)

For further information and the contact details of the supervisory authority of each EEA member state, please refer to [this website page of the European Data Protection Board](#) with all relevant contact details. In addition, you may always apply to the competent civil court to make a claim for compensation.

## **10. How can you exercise your rights?**

You can exercise the aforementioned rights simply by sending us an e-mail or by sending us a letter (see our contact details above).

When you make a request to exercise your rights, if we have any doubts about your identity, we will ask you to verify it. In this case, we will request the transmission of documents that enable your identification beyond a reasonable doubt, such as a copy of the front of your identity card.

## **11. Changes**

We reserve the right to change this Privacy Policy. The most recent version is available on our website at all times. The date on which this Privacy Policy was last amended can be found at the top of this page. In the event of a substantial change in the Privacy Policy, we will inform the data subjects on whom this may have an impact, directly if possible.