

PERSONAL DATA PROTECTION STATEMENT

1. Who are we?

1.1. CAPTAINS OF CYCLING as data controller

With this statement (hereinafter the “**Statement**”), we wish to inform you of the reasons and methods for collection and processing of your data by CAPTAINS OF CYCLING SCRL, whose registered office is located in 1040 Brussels, Belliardstraat 25-33, registered under the company number 0478.242.662 (hereinafter “**We/Us**”).

You will find our details in point 10 of this Statement.

We are data controllers of personal data which we ask you for and use. As data controller, we take the necessary measures to guarantee that you:

- are always notified of processing of your personal data and of your rights;
- maintain control over the personal data that we process;
- may exercise your rights relating to your personal data. You will find further information on your rights in point 9 of this Statement.

2. What data do we collect concerning you?

2.1. Personal data

By “personal data”, we mean all information referring to a living physical person. The type of personal data that we collect depends on the services that you request and includes, if applicable, data concerning you and/or concerning your representatives, your staff, your freelance staff and/or your directors (hereinafter collectively referred to as “You” or “Your”).

If we receive personal data from you concerning your representatives, your staff, your freelance staff and/or your directors, you must inform them of the existence and content of this Statement, including our obligations, their rights and the way in which they may exercise these rights.

In particular, we collect administrative data and contact details. This data enables us to identify or contact you, or do business with you if you are a customer, a supplier or a sales partner. This personal data may be details such as your name, your address, your telephone number, your email address or even your bank account number.

We do **not** collect and process sensitive data, namely:

- personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership;
- genetic or biometric data (e.g.: facial images and fingerprints);
- health related data;
- data relating to sexual behaviour or sexual orientation.

If such sensitive data was to be provided to us, we would not use it and would delete it.

2.2. Minors

We have no intention of processing personal data from minors.

3. Why do we need your data?

3.1. Provision of services and customer relationships

- What does this purpose consist of?

We can use your personal data to register you as a customer and/or a co-operator and to carry out our activities or services.

- What personal data do we process for this purpose?

For this purpose, we collect and process your name, your email address, your telephone number and your physical address.

3.2. Marketing information and communication

- What does this purpose consist of?

We wish to be able to inform you of our services, events of relevant news. This information may be done at your express request, or if we consider that a service may interest you or be of use to you.

You will receive our direct marketing communications if you have given us your explicit consent for this. We will specifically request your explicit consent if you are not one of our customers.

However, even if you do not give your consent, you may still receive offers or advertising from us, in particular if you already have a customer relationship with us. In this case, we base this on our legitimate interest.

If you do not wish to receive any advertising, please exercise your right of objection to direct marketing, as indicated in point 9.2 of this Statement.

- What personal data do we process for this purpose?

For this purpose, we collect and process your name, your email address, your telephone number and your physical address, as well as data on any areas of interest you may have.

3.3. Operation as a company

- What does this purpose consist of?

This purpose summarises what is known as “legitimate interest”. In effect we still have a certain number of legitimate interests which constitute the basis for processing personal data. This processing only takes place after we have assessed that in any event, the balance between our legitimate interests and the possible impact on your privacy is not negatively affected.

If, however, you object to this processing, you may exercise your right of objection, as indicated in point 9.3 of this Statement.

Consequently, personal data is processed under different circumstances:

- It may be used for providing evidence (archives);
 - It may be used for the administration, management (of risks) and control of our organisation, with regard to its compliance, for example, (preventing money laundering and fraud and investigations, privacy protection, among others), risk management, risk and inspection operations, complaint management, internal and external audits;
 - It may be used for constituting, exercising, defending and safeguarding our rights or those of people who could represent us, for example in case of dispute;
 - It may be used to support and facilitate the purchase, use and termination of services by the customer, among other things to avoid you having to fill in information again that you have already sent in the past.
- What personal data do we process for this purpose?

For this purpose, we collect and process your name, your email address, your telephone number and your physical address.

3.4. Profiling

Your personal data will not be used for profiling purposes.

3.5. Legal obligations

We may be legally bound to process certain data, and in particular send it to the competent authorities.

4. Do we ask for your consent for processing?

4.1. General

We may only lawfully use and process your personal data if one of the following conditions is fulfilled:

- The use of your personal data is **necessary for the performance of a contract** that you have entered into with us or to be able to carry out, at your request, the actions necessary for entering into a contract with us.

The processing purposes stated in **point 3.1** of this Statement are based on this.

- We have your **free and explicit consent** to use your personal data for a specific purpose.

For example, we will ask you for your consent to write to you for direct marketing purposes, as stated in **point 3.2** of this Statement, if you do not yet have a customer relationship with us.

- The use of your personal data is necessary to **defend our legitimate interests**, to the extent that they prevail over your interests and rights.

We base the processing necessary to our operation as a company on our legitimate interest, as stated in **point 3.3** of this Declaration and to be able to write to our existing customers for direct marketing purposes, as stated in **point 3.2** of this Statement.

- We may be **legally bound** to process certain data. In this case, the relevant legislation constitutes the grounds for processing personal data.

5. Who else do we share your data with?

- The only people with access to your data are our **employees** who effectively require access to it to carry out their tasks. These people act under our supervision and our responsibility.
- We also turn to **external suppliers** who carry out certain processing for us so we may offer you our products and activities, such as IT, financial and accounting services and other similar services. As these third parties have access to personal data as part of the services that we ask them for, we have taken technical, organisational and contractual measures in order to guarantee that your personal data is only processed and used for the purposes stated in point 3 of this Statement.
- Your personal data may be provided to **supervisory authorities, tax proceedings and investigation services** solely in the case where we are legally bound to do so.

6. Where is the data stored and processed?

Your data will not be taken outside the EU and, in all cases, we shall ensure that the minimum legal requirements and security standards are complied with at all times. If we anticipate that your data will be stored and processed outside the EU, we will explicitly state this and will ensure that the same level of protection is applied as within the EU.

Apart from these cases, your personal data will never be transferred or made available to third parties and will be used exclusively for our account. Therefore, other companies may not use your data to send you advertising, for example.

7. How long do we store your personal data?

We will only store your data for the period necessary to the purposes for which it is used, stated in point 3 of this Declaration. Any derogations from or clarifications of this principle are expressly mentioned under the different purposes indicated in point 3 of this Statement.

Insofar as the need to store data may vary depending on its type and the processing purpose, the actual time for which it is stored may vary widely.

We can inform you in this regard that in particular we take the following criteria into consideration for determining the storage time.

- For how long do we need personal data in order to be able to provide the service requested?
- Have we set and stated a determined specific storage time?
- Have we obtained consent for a longer storage time?
- Do we have a legal, contractual or similar obligation to store data?

As soon as your data is no longer necessary and we no longer have the legal obligation to store it, we will permanently delete it or, if this is not possible, we will make it anonymous in our systems.

Your personal data will however be stored and used for as long as necessary to comply with our legal obligations, settle disputes or have our contracts complied with.

8. How do we protect your personal data?

Your personal data is considered as strictly confidential. We take appropriate technical and organisational measures to protect personal data provided and collected against destruction, loss, accidental modification, degradation, accidental or unlawful access to this data, or any other unauthorised processing of personal data.

9. What are your rights?

We wish to fully support you in exercising your rights relating to your personal data, as detailed below.

To exercise the above mentioned rights, you may send us a written request according to the terms defined in point 10 of this Statement. When you **exercise** your right, we ask you to clearly mention which right you wish to invoke and which processing you wish to object to or which consent you wish to withdraw.

We should like to draw your attention to the fact that opposing certain processing or withdrawing your consent for certain processing of your personal data may lead to the consequence that you will no longer be informed about the activities or services we offer or that you will no longer be able to make use of them.

9.1. Right of access to your personal data

You always have right to access and consult the personal data that we process in relation to you. In this regard, we will provide you with a free copy of this personal data if you request it.

9.2. Right of rectification of your personal data

You always have the right to have erroneous, incomplete, inappropriate or obsolete personal data deleted or corrected.

9.3. Right to withdraw your consent

When the processing is based on your consent, as explained in point 4.1, you have the right to withdraw this consent at any time.

9.4. Right to object to certain processing

When your personal data is processed on the basis of legitimate interest, you have the right to object its processing for reasons associated with your specific situation.

9.5. Right to object to direct marketing

As stated in point 4.1 above, we ask you for your consent to send you marketing information, advertising or personal offers (by means of direct marketing campaigns or electronic information notices). You have the right to object to processing of your data for direct marketing purposes if you do not (or no longer) wish to receive such notifications from us. In this case, we will no longer process your data for direct marketing purposes. Your request will be implemented as quickly as possible.

If you have exercised your right of objection, you may, if you wish, reauthorise the direct marketing activities through the same channels.

We draw your attention to the fact that exercising your right of objection does not prevent us from contacting you, if necessary, for any other purpose, including implementing the contract, in accordance with this Statement.

9.6. Right of erasure of your personal data

You have the right to have your personal data erased. On the basis of this right, you may request us to stop using your personal data when you no longer wish to maintain a relationship with us. We may however store personal data necessary for evidence purposes.

By virtue of this right of erasure, you also have the right to request us at any time to stop using your personal data which is processed on the basis of your consent or our legitimate interest. For reasons of legitimate interest we may continue to process your personal data after having weighed up the balance of your interests and ours, unless you decide to terminate your relationship with us.

9.7. Right to transfer personal data

With regard to processing your personal data on the basis of your consent or its necessity for provision of the products or services requested, you may request us to send you your personal data - in a commonly used digital and structured form - in order to be able to save it with a view to personal (re)use or send it direct to another data controller, provided that this is technically possible for us.

9.8. Right to restriction of certain processing

You may request us to restrict the processing of your personal data in each of the following cases:

- If you dispute the accuracy of personal data, you may request restricting processing for a period enabling us to check its accuracy;
- If the processing is illegal and you object to the erasure of personal data and you request us instead to limit its use;
- If we no longer need your personal data for the processing purposes stated in point 3, but you still require it for the establishment, exercise or defence of legal claims;
- If you object to a processing, we will suspend the processing while waiting the answer to the question of knowing whether our legitimate reasons prevail over yours.

If you have obtained the right to limit processing, we will no longer carry out operations with the personal data in question, apart from recording this data.

10. How to exercise your rights and/or ask a question or make a claim?

If you wish to exercise your rights or you have a question or a claim concerning the way in which we process personal data, you may contact us by means of the following channels:

- by email: privacy@captainsofcycling.be ;
- by letter to the following address: CAPTAINS OF CYCLING SCRL, Belliardstraat 25-33 in 1040 Brussels,.

If you are not satisfied with our response, you have comments concerning exercising your rights or you consider that our processing of your personal data does not comply with legislation, you have the right to submit a complaint concerning this to the Data Protection Authority. You will find all the relevant information at <https://www.dataprotectionauthority.be/>.

11. Amendments to this Statement

We may amend or supplement this Statement if we consider this useful.

In case of making major amendments to the Statement, we will change the date of the update, notify you of the update of the Statement and provide you with a copy. In addition, we invite you to periodically consult this Statement in order to find out how we process and protect your personal data.