

DATA PROTECTION NOTICE CORDEEL GROUP

1 INTRODUCTION

Cordeel Group, which comprises all companies as described in *Annex 1 'Affiliated companies Cordeel Group'* (all separate and independent legal entities), wants to provide you with the best possible service and perform its activities in the best possible way. That is why in certain cases, we have to process personal data from you.

As joint controllers of your personal data, all companies as described in Annex 1 'Affiliated companies Cordeel Group', do everything they can to guarantee your privacy and therefore handle your data with the utmost care. We attach great importance to the safe, transparent and confidential collection and processing of personal data. We place high priority on protecting data belonging to parties that include our clients, subcontractors, suppliers and website visitors against, among other things, loss, leaks, errors, unauthorised access and unlawful processing.

By means of this Data Protection Notice, we inform you about the collection and processing of your personal data.

Please read this Data Protection Notice carefully as it contains essential information about how your personal data is processed and for what purpose.

By sharing your personal data, you expressly declare that you have read this Data Protection Notice and expressly declare your agreement with its terms which include processing of the data.

2 SCOPE

This Data Protection Notice is applicable to all services that we provide and, more generally, to all activities we perform.

3 JOINT CONTROLLERS

All companies as described in *Annex 1 'Affiliated companies Cordeel Group'* are joint controllers of your personal data.

In accordance with Article 26 GDPR, we confirm to you that the mutual arrangement between the entities is such that each entity remains responsible in principle for the data it receives and processes. However, data subjects can exercise their rights vis-à-vis each of the controllers via one central point of contact: gdpr@cordeel.eu.

4 PERSONAL DATA

When collecting and processing your personal data, we comply with Belgian regulations on the protection of personal data and with the General Data Protection Regulation (GDPR), which came into force on 25 May 2018.

Depending on your activities and your relationship with our company, you provide us with the following personal data: your identity and contact details (name, title, address, e-mail address and telephone and mobile numbers),... For specific legal obligations (electronic attendance registration, art. 30bis declaration of works), it may be that you provide us with additional data so as to record your attendance (such as E-ID details, Limosa number).

We would like to point out that you are responsible for all the information you provide to us and that we rely on its accuracy. Should your data no longer be up to date, please inform us immediately.

Although you are not obliged to communicate your personal data, you understand that providing certain services or collaboration becomes impossible if you do not agree with it being collected and processed.

Portraits

To protect our goods and installations and to provide in general security, some (building) sites are equipped with fixed camera surveillance and/or drones. These images are for internal use only and will be transmitted to the authorities in case of theft, vandalism or in case of a possible accident. At no time will images of people be used for external or commercial applications. For marketing applications, some construction sites or buildings are equipped with timelapse cameras that show the progress of the construction site. In publication, profound care is taken to ensure that no persons are recognisable in the video or image.

5 PROCESSING PURPOSES AND LEGAL BASIS

5.1 Client data

Within the scope of our services and activities, we collect and process the identity and contact details of our customers and clients and their staff as well as appointees and other useful contact persons. This processing is carried out for the purposes of executing agreements with our clients, client management, accounting, organization of the work schedule, as well as the management of any disputes and complaints, and direct marketing activities, such as sending promotional or commercial materials. The performance of a contract, compliance with legal and regulatory obligations (including, for example, the art. 30bis declaration of works) and/or our legitimate interest serve as the legal basis for this.

5.2 Data from suppliers and subcontractors

We collect and process the identity and contact details of our suppliers and subcontractors and potential sub-subcontractors and their staff, appointees and other useful contact persons. This processing is carried out for the purposes of executing agreements, managing the suppliers/subcontractors, accounting, the management of any disputes and complaints, and direct marketing activities, such as sending promotional or commercial materials. The performance of a contract, compliance with legal and regulatory obligations (including, for example, compulsory electronic recording of attendance, the art. 30Bis declaration of works, the attendance list or other public contract requirements) and/or our legitimate interest (such as direct marketing) serve as the legal basis for this. Where relevant, E-ID details or the Limosa number will be processed for the purpose of electronic attendance registration. For direct marketing activities via e-mail (for example, newsletters or invitations to events), permission will always be requested and can also be withdrawn at any time.

5.3 Staff data

We process our employees' personal data within the scope of staff management and wage administration. Given its specific nature, this processing is regulated more extensively in a Data Protection Policy for employees.

5.4 Other data

In addition to data belonging to our clients, suppliers/subcontractors and staff, we also process the personal data of other parties, such as potential new clients/prospects, useful contacts in our industry, network contacts and relevant experts. This processing is carried out in relation to our general, direct marketing and public relations activities. Our legitimate interest, or in some cases the performance of a contract, serves as the legal basis for this.

Through our websites, we collect only that personally identifiable information about you (such as your name, title, address, telephone number or email address) that you provide us with yourself for example via a contact form, registration or survey. If there is certain information you do not wish to communicate to us then you are under no obligation to do so.

6 DURATION OF PROCESSING

We will store and process personal data no longer than required for the purpose for which it was collected and for the purpose of our relationship with you (contractual or otherwise).

7 RIGHTS

In accordance with and subject to Belgian personal data legislation and the provisions of the GDPR, we hereby inform you that you have the following rights:

- The right of access and inspection: you are entitled, free of charge, to access the data we have about you and to verify the purpose for which it is used.
- The right to rectification: if your personal data is incomplete or incorrect, you have the right to rectification (correction or completion).
- The right to erase or restrict data: you have the right to request that we erase your personal data or that we restrict its processing in the circumstances and under the conditions set down in the GDPR. We may refuse to erase or restrict any personal data that may be necessary for us to comply with a legal obligation, for the performance of a contract or for our legitimate interest and to do so for as long as such data is required for the purpose for which it was collected.
- The right to data portability: you have the right to obtain the personal data you provided to us in a structured, commonly used and machine-readable form. You have the right to transfer this data to another data controller.
- The right to object to processing: you have the right to object to the processing of your personal data for serious and legitimate reasons. However, please be aware that you cannot object to the processing of personal data that is necessary for us to comply with a legal obligation, for the performance of a contract or for our legitimate interest, and that this remains the case for as long as such data is required for the purpose for which it was collected.
- The right to withdraw consent: if the processing of personal data is based on prior consent, you have the right to withdraw this consent. In that case, personal data will be processed only if we have another legal basis for doing so.
- Automated decision making and profiling: we confirm that the processing of personal data does not include profiling and that you will not be subject to a decision that is based solely on automated processing.

You may exercise the above rights by contacting the Cordeel IT department at gdpr@cordeel.eu or by calling us on +32 (0)3 710 55 72.

Normally, we will respond to your request within four weeks of receipt. In the event of a decision to improve, supplement, delete and/or protect personal data, we strive to implement this within 14 working days.

In order to exercise one or more rights in writing or by e-mail, and to prevent any unauthorized disclosure of personal data, you must provide proof of identity. This is preferably the front of the identity card.

You can also contact us via the above route if you wish to formulate a complaint regarding the processing of your personal data.

We make every effort to handle your personal data in a careful and legitimate manner, in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been violated and your concerns have not been addressed by our company, you are entitled to lodge a complaint with:

Data Protection Authority
Drukpersstraat 35, 1000 Brussels
Tel. +32 (0)2 274 48 00
Fax. +32 (0)2 274 48 35
E-mail: contact@apd-gba.be

Or use the [online web form](#).

In addition, you can appeal to a court of law if you believe that you would suffer loss or damage as a result of the processing of your personal data.

To unsubscribe from the digital newsletters, you can simply click on the unsubscribe button in the e-mails themselves. When you wish to unsubscribe from brochures or magazines, you can always contact us at gdpr@cordeel.eu.

8 TRANSFER TO THIRD PARTIES

Certain personal data that we collect will be transferred to and possibly processed by third party service providers, such as our IT supplier, accountant, auditor, professional advisors, insurer and by the government (for example, in the case of the 30bis declaration of works, electronic attendance recording or public procurement contracts).

One or more of the above third parties may be located outside the European Economic Area (EEA). However, personal data will only be transferred to countries that have a suitable level of protection.

The employees, managers and/or representatives of the abovementioned service providers or institutions, as well as the specialised service providers that they appoint, must respect the confidential nature of your personal data and may use this data only for the purpose for which it was provided.

Your personal data may be forwarded to other third parties if necessary. For example, this might be the case if we were to be fully or partly reorganised, if our activities were to be transferred or if we were to be declared bankrupt. It may also be the case that personal data must be transferred as the result of a court order or to comply with a specific legal obligation. In that event, we will make reasonable efforts to inform you prior to this communication to other third parties. However, we ask you to recognise and appreciate that in certain circumstances this may not always be technically or commercially feasible or legal restrictions may apply.

Under no circumstances will we sell or make your personal data commercially available to direct marketing agencies or similar service providers without your prior consent.

9 TECHNICAL AND ORGANISATIONAL MEASURES

When processing your personal data, we take the necessary technical and organisational measures to ensure confidentiality and security and to protect this data against destruction, loss, forgery, alteration, unauthorised access or accidental disclosure to third parties as well as from any other unauthorised processing.

These measures include:

- training for relevant staff to ensure they are aware of our data protection obligations when handling personal data;
- administrative and technical controls to limit access to personal data on a need-to-know basis;
- technical security measures, including firewalls, anti-virus software and encryption;
- physical security measures, such as security badges for access to our buildings, business areas that are closed, etc.

Although we take appropriate security measures once we receive your personal data, in particular the transmission of data is never completely secure. We do our utmost to protect your personal data, but we can never fully guarantee the security of the personal data sent to us or by us.

Under no circumstances can Cordeel Group and its affiliates and/or the controller be held liable for any direct or indirect damage or loss resulting from incorrect or unlawful use of the personal data by a third party.

10 ACCESS BY THIRD PARTIES

To be able to process your personal data, our employees, colleagues and appointees are granted access to this data. We guarantee a similar level of protection by making contractual obligations opposable to these employees, colleagues and appointees, which are similar to this Data Protection Notice.

11 FURTHER QUESTIONS

If, after reading this Data Protection Notice, you have any further questions or comments regarding the collection and processing of your personal data, please contact the Cordeel IT department by post at Cordeel Zetel Temse NV, IT department, Frank van Dyckelaan 15, 9140 Temse or by sending an e-mail to gdpr@cordeel.eu.

12 Annexe 1 – Affiliated companies Cordeel Group

This data protection notice is applicable for all entities that operate under the ‘Cordeel Group’ brand name and are listed below.

Company	Address of registered office	CBE number
C2F1	Frank Van Dyckelaan 15, 9140 Temse	744.436.002
Cordeel Group	Frank Van Dyckelaan 15, 9140 Temse	458.393.294
Cordeel Finance	Frank Van Dyckelaan 15, 9140 Temse	879.916.001
Cordeel Zetel Temse	Frank Van Dyckelaan 15, 9140 Temse	405.013.602
C-supply	Frank Van Dyckelaan 17, 9140 Temse	860.464531
C-rental	Frank Van Dyckelaan 15, 9140 Temse	508.811.817
Cordeel Zetel Hoeselt	Industrielaan 18, 3730 Hoeselt	427.302.321
Cordeel Maintenance	Industrielaan 18, 3730 Hoeselt	822.224.953
C-concrete	Frank Van Dyckelaan 19D, 9140 Temse	460.990.520
C-metal	Frank Van Dyckelaan 19A, 9140 Temse	735.611.772
C-wood	Frank Van Dyckelaan 19C, 9140 Temse	735.611.970
Offsite Belgium	Afschrijverslaan 1, 9140 Temse	633.975.271
C-tech Holding	Frank Van Dyckelaan 17, 9140 Temse	404.800.202
Imtech Belgium	Industrielaan 28, 1070 Brussel	402.969.474
Buildings Maintenance & Services	Frank Van Dyckelaan 17, 9140 Temse	707.804.149
C-scan	Frank Van Dyckelaan 17, 9140 Temse	736.374.510
C-guard	Koralenhoeve 9, 2160 Wommelgem	502.264.416
C-energy	Frank Van Dyckelaan 15, 9140 Temse	456.904.543
C-ground	Frank Van Dyckelaan 15, 9140 Temse	477.733.413
C-battery	Frank Van Dyckelaan 17, 9140 Temse	762.436.529
C-living	Frank Van Dyckelaan 15, 9140 Temse	446.150.708
Vita Scheldebad / VITA TEMSE	Kasteelstraat 85, 9140 Temse	665.710.010
Vita Den Uyt	Rode-Kruislaan 18, 2400 Mol	676.848.479
Vita Group	Frank Van Dyckelaan 15, 9140 Temse	458.393.294
Vita Krokodiel / VITA Middelkerke	Frank Van Dyckelaan 15, 9140 Temse	743.504.406
C-fire	Frank Van Dyckelaan 15, 9140 Temse	415.201.669
Grounds Up	Frank Van Dyckelaan 17, 9140 Temse	798.913.180
Panorama View	Frank Van Dyckelaan 15, 9140 Temse	885.737.187