

## PRIVACY STATEMENT

Square Circle<sup>bvba/sprl</sup> is committed to your privacy. To ensure that you can continue to entrust us with your personal data, we respect applicable privacy and data protection legislation and act in accordance with the 'General Data Protection Regulation'<sup>1</sup>. If you make use of our website, you are deemed to agree with this Privacy Statement.

### 1. Personal data

Personal data means: any information relating to an identified or identifiable natural person. In other words this legislation does not cover data which concerns legal persons. A natural person is considered to be "identifiable" if (s)he can be identified directly or indirectly, in particular by means of one or more specific elements that are characteristic for the physical, psychological, economic, cultural or social identity of the natural person concerned.

#### 2.1. Use of our website and blog

When you make use of our website and/or blog, you must agree to the use of cookies and other tracking technologies (XSRF-Token, Session, Google Analytics). Cookies are small (text) files that are placed on your computer or mobile device by the websites you visit. They are very common and are used by us to make our website work better and more efficiently and to optimise its ease of use. Tracking technologies (such as Google Analytics) help us to monitor visitor statistics and optimise our website. At any time you can manage, disable or delete all installed cookies via your browser settings. If you disable the cookies applied by us, this may affect your user experience when you visit our website and/or blog.

When you use our online contact form, we need to process the following personal data: first name, surname and email address or other contact details.

#### 2.2. Our services

When you make use of our services, you are obliged to provide us with certain personal data. This is a necessary condition for the agreement between you and us to be concluded and executed correctly. Furthermore, we are obliged to collect and keep certain personal data, as this is a legal obligation<sup>2</sup>.

However, we always process your personal data in a proportional manner, in the sense that we only process the data that are necessary, relevant and restricted to the intended purposes. Such purposes should be understood to include:

- carrying out our assignments and providing services for you
- complying with our legal obligations, preventing illegal or suspected illegal practices and/or fraud
- upholding our Terms and Conditions
- developing marketing strategies, including the fine-tuning of our website content
- optimising our services and offering bespoke services
- getting in touch with you and/or your company

In accordance with applicable law, this processing of personal data is justified on the basis of:

- consent given by yourself for one or more specific purposes
- the public nature of such information
- the strict necessity to perform and comply with our contractual and/or legal obligations
- safeguarding our legitimate interests, including ensuring the continuity of our activities
- other legitimate interests, including upholding our Terms and Conditions

---

<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

<sup>2</sup> e.g. as stipulated in the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on restricting the use of cash (the so-called "Anti-Money Laundering Act").

### **3. Sharing of personal data with third parties**

Unless you consent to this or we are legally obliged to do so, we will not pass on, share, sell, etc. your personal data to third parties. In some instances, third parties (such as affiliated companies, sub-processors including software providers, external employees and third parties who carry out an order for you or us, etc.) will have access to your personal data. We only allow this to the extent that we are legally obliged to do so, to the extent that this is necessary for the performance of our activities, when we are involved in a (legal) dispute or litigation and to safeguard and protect our and/or your (property) rights. However, we shall ensure that privacy rights are always fully respected and with any such third party sub-processor we shall conclude written agreements containing obligations that are no less protective than those included in our own Privacy Statement. While observing the foregoing, we shall not disclose your personal data to any third country or international organization.

### **4. Security of personal data**

We shall put the necessary technical and organizational measures in place to protect your personal data and privacy. For instance, we shall make use of appropriate security technologies and set up the necessary internal processes and procedures to provide appropriate protection of your personal data. In addition our employees are carefully selected and trained to handle confidential personal data appropriately and correctly, and have a contractual obligation to maintain confidentiality. To the extent possible and reasonable, we shall ensure that access to your personal data is limited to those persons who need such access for the performance of their duties or to what is required for the performance and fulfilment of our contractual and/or legal obligations. In the event of a data leak or data breach, in accordance and compliance with the applicable legislation and in the circumstances provided by the law, we shall inform you personally of the incident.

### **5. Your privacy rights**

The applicable legislation grants a number of rights to natural persons with regard to the processing of their personal data:

- the right to access
- the right to rectification of incorrect personal data
- the right to erasure (the right to be forgotten)
- the right to restriction of processing
- the right to portability of personal data
- the right to object to automated individual decision-making including profiling

To exercise these rights, please send an email to the following email address: [info@squarecircle.be](mailto:info@squarecircle.be). For us to verify your identity, this email must be accompanied by a copy of your proof of identity. We will respond to your request without delay and in principle within one month. In addition, at any time you have the right to withdraw your consent to the processing of your personal data. However, such withdrawal of consent shall in no way affect the lawfulness of processing based on consent given at a time before its withdrawal. In principle, the exercise of the above rights shall be free of charge. In accordance with applicable law, we have the right and may choose to (i) charge a reasonable fee or (ii) refuse to act on the request, if such request is manifestly unfounded or excessive. Furthermore, you shall have the right to lodge a complaint with the competent Data Protection Authority ([contact@apd-gba.be](mailto:contact@apd-gba.be), [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)).

### **6. Retention period for personal data**

We shall not retain your personal data longer than is necessary to achieve the intended purpose. Taking account of the foregoing and unless certain statutory limitation or retention periods should require a longer period, the personal data that we process in the context of our services will be retained for a period of ten years after the end of our collaboration. Personal data processed by us as a result of the use of our website, our online contact form and our blog shall be retained for a period not exceeding 36 months. After expiry of the applicable retention period(s), the personal data will be deleted or anonymized, taking into consideration the overwriting period of our backup procedure.

## **7. Modifications and updates**

We may unilaterally amend the present Privacy Statement at any time without any prior notification being required. In the event of contradictions or discrepancies, our Terms and Conditions or any specific conditions that may apply shall prevail over this Privacy Statement.

## **8. Contact**

For all questions and comments relating to our website, blog and/or electronic communication and also in connection with this Privacy Statement, please feel free to contact us directly at:

Square Circle<sup>bvba/sprl</sup>

Avenue de Calabre 10 (b30)

1200 Brussels

Brussels Register of Legal Entities

Tel.: +32 (0)2 779 3735

Email: [info@squarecircle.be](mailto:info@squarecircle.be)

## **DISCLAIMER**

### **1. Website – blog – electronic communications**

Square Circle<sup>bvba/sprl</sup> applies the utmost care with the compilation of this website, the composition of its blog and when drawing up its electronic communication. However, we are not liable for any imperfections or defects, nor can we be held responsible for omissions and/or material errors on our website, in our blog and/or electronic communications. Further to the above, we also accept no responsibility whatsoever for any alterations to our electronic communications after they were sent.

Moreover, the information provided must not be construed as advice, opinion, or provision of services. As a visitor to this website/blog and/or as a recipient of an electronic communication from us, you remain fully liable for any consequences of your use of the information provided. Accordingly, we advise you always to consult our experts in the field, who can provide personal guidance.

### **2. Confidentiality**

Our electronic communication (including emails) is confidential and intended exclusively for the addressee. If you are not the intended recipient, please inform us immediately by email, remove and destroy these files, including any (local) copies, on any medium used (computer, tablet, smartphone, etc.). Any disclosure, distribution and/or provision of this information to third parties is not permitted and may be punishable.

In accordance with applicable legislation, any and all messages sent and received by us can be monitored for security reasons and their conformity with (internal) regulations may be checked.

### **3. Intellectual property and proprietary rights**

Square Circle<sup>bvba/sprl</sup> owns all intellectual property and proprietary rights, including the copyright, associated with the content published on its website and/or in its electronic communications, including software, texts, photos, images and sound fragments. This means that our prior written consent is required before use can be made of the information published on the website and/or through electronic communications.

## **COOKIE STATEMENT**

We use cookies and other tracking technologies when you visit our website.

Cookies are small (text) files that are placed on your computer or mobile device when you visit a website. They are very common and are used by us to make our website work better and more efficiently and to optimise its ease of use.

Different types of cookies can be distinguished according to origin, function and lifespan. Cookie types used by us include:

- Essential cookies: these enable you to navigate our website and make full use of its features.
- Functional cookies: these facilitate the operation of our website and provide a personalized experience by, for example, remembering user preferences.
- Performance cookies: these cookies collect data about the use of our website, including visitor numbers, which pages on the site are most popular and how much time individual users spend on specific pages. For these purposes we also make use of cookies from third parties such as Google Analytics. These third party cookies collect anonymous data about the use of our website and compile visitor statistics.

The information collected by cookies and other tracking technologies is treated confidentially and is always processed in accordance with current legislation. Furthermore, we take far-reaching measures to secure this information. For further information, we refer you to our Privacy Statement.

At any time you can manage, disable or delete all installed cookies via your browser settings. If you disable, block or delete the cookies applied by us, this may affect your user experience on our website.