

PRIVACY STATEMENT

Version Privacy Statement 15/10/2020

We understand that your trust in us, is BV/SRL Castel Engineering's most important asset (hereinafter referred to as "Castel", "we" or "us"). As such, your privacy is essential for us.

This privacy statement (hereinafter referred to as "Privacy Statement") is applicable, inter alia, **(i)** to our website <https://www.castel-engineering.com/> (hereinafter referred to as the "Website") , **(ii)** when visiting the building/office of CASTEL, and **(iii)** to all (commercial) relations between CASTEL and its customers, prospects and business partners.

This Privacy Statement includes information about the personal data collected by CASTEL, as well as the manner in which CASTEL uses and processes this personal data.

CASTEL wishes to emphasize that it always attempts to act in accordance with **(i)** the Belgian Privacy Law of 30 July 2018 concerning the protection of individuals with regards to the processing of personal data, **(ii)** the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and/or **(iii)** all (future) Belgian laws regarding the implementation of this Regulation.

Visiting the Website, purchasing products/goods of CASTEL and any communication with CASTEL implies your explicit approval (through disclosure of your personal information or opt-in) of the Privacy Statement and consequently how we collect, use and process your personal data.

Please read this Privacy Statement in conjunction with CASTEL's cookie policy.

- Types of personal data

CASTEL can collect and process the following personal data:

- ✓ Name
- ✓ Surname
- ✓ Function
- ✓ E-mail address
- ✓ Telephone number (landline and/or mobile phone)
- ✓ Account name
- ✓ Password
- ✓ Camera footage
- ✓ Company name
- ✓ Company address
- ✓ Invoicing address
- ✓ IP-address
- ✓ All personal data provided in the 'free field' when completing a contact form
- ✓ All personal data freely provided to CASTEL (e.g. in light of correspondence with CASTEL)

CASTEL also automatically collects anonymous information regarding your use of the Website. As such, CASTEL shall, for example, automatically log which sections of the Website and Platform you visit, which web browser you use, which website you visited when you obtained access to the Website. We cannot identify you through these data, but it allows CASTEL to draw up statistics regarding the use of the Website.

- **Methods of personal data collection:**

These personal data are collected in the context of:

- ✓ Visiting the Website
- ✓ Collaboration with CASTEL
- ✓ Incoming and outgoing correspondence with CASTEL
- ✓ Visiting the office/building of CASTEL
- ✓ Requesting an offer
- ✓ Subscription to a trade show
- ✓ Exchanging business cards

- **Use of personal data**

CASTEL can use your personal data for the following purposes:

- ✓ Performance of the agreement with CASTEL (incl. follow-up thereof)
- ✓ Responding to questions (whether or not received through the contact form)
- ✓ Optimising the quality, management and content of the Website
- ✓ Creating statistics
- ✓ Drawing up a quote
- ✓ Follow-up after a meeting
- ✓ Creation of an account and the confirmation thereof
- ✓ Providing support/assistance (e.g. in case of problems)
- ✓ Send targeted marketing and advertising, updates and promotional offers based on your communication preferences and – where applicable – upon explicit consent
- ✓ Conducting market research
- ✓ Registration of visitors of the office/building of CASTEL
- ✓ Confirmation of the subscription of an event or trade show
- ✓ Issuing invoices and the collection thereof
- ✓ Security of the building
- ✓ Booking a hotel for a contact person of a customer

Processing takes place on the following legal grounds, as the case may be:

- ✓ You have given consent to the processing of your personal data for one or more specific purposes
- ✓ Processing is necessary for the performance of the agreement with CASTEL or in order to take steps at your request prior to entering into an agreement
- ✓ Processing is necessary for compliance with a legal obligation to which CASTEL is subject
- ✓ Processing is necessary in order to protect your vital interests or of another natural person
- ✓ Processing is necessary for the performance of a task carried out in the public interest
- ✓ Processing is necessary for the purposes of the legitimate interests pursued by CASTEL or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

- **Disclosure of personal data to third parties**

CASTEL shall not disclose your personal data to third parties, unless it is necessary for the purposes as described in this policy (including but not limited to the transport of deliveries, database management, customer checks, insurance and delivery of services to CASTEL (i.e. in light of subcontracting)). In this respect, your personal data may be disclosed to transport partners, software providers, cloud partner, data centres, external IT-consultants, financial institutes, insurance companies and service providers (photograph, translator, etc.).

If it is necessary that CASTEL discloses your personal data to third parties, CASTEL undertakes in any case to conclude a data processing agreement with these third parties, which contains the necessary guarantees regarding the confidentiality and privacy compliance of your personal data.

Notwithstanding the foregoing, it is however possible that CASTEL discloses your personal data:

- ✓ To the competent authorities **(i)** if CASTEL is obliged to do so under the law or under legal or future legal proceedings and **(ii)** to safeguard and defend our rights
- ✓ If CASTEL, or the majority of its assets, are taken over by a third party, in which case your personal data – which CASTEL has collected – shall be one of the transferred assets

In all other cases, CASTEL will not sell, hire out or pass on your personal data to third parties, except when it **(i)** has obtained your permission to this end and **(ii)** has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

- **Cross-border processing of personal data**

Any transfer of personal data outside EEA to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be subject of one or more of the listed EU-approved safeguards:

- ✓ Closing a data transfer agreement with such recipient, which shall contain the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)'; and/or
- ✓ Binding corporate rules; and/ or
- ✓ Certification mechanisms.

- **Storage of personal data**

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, CASTEL shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Statement under 'Use of personal data'.

- **Your privacy rights**

In light of the processing of your personal data, you enjoy the following privacy rights:

- ✓ Right of access to your personal data
- ✓ Right to rectification, completion or update of your personal data
- ✓ Right to delete your personal data ('right to be forgotten'). (CASTEL wishes to point out that in this context certain services will no longer be accessible and/or can no longer be provided if you delete resp. request deletion of certain required personal data)
- ✓ Right to limit the processing of your personal data
- ✓ Right to transferability of your personal data
- ✓ Right to object to/oppose the processing of your personal data

If you wish to invoke your privacy rights please contact privacy@castel-engineering.com and request a form to exercise your privacy rights and deliver it back to CASTEL by email or post.

In principle, you can exercise these rights free of charge via the form you will receive after emailing the above

mentioned email address.

- **Security of personal data**

CASTEL undertakes to take reasonable, physical, technological and organisational precautions in order to avoid **(i)** unauthorised access to your personal information, and **(ii)** loss, abuse or alteration of your personal data.

CASTEL shall store all personal data, which it has collected onsite and in the cloud with data centres in the EU.

Notwithstanding CASTEL' security policy, the checks it carries out and the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, CASTEL is, in this context, not in a position to guarantee absolute security.

- **Update Privacy Statement**

CASTEL is entitled to update this Privacy Statement by posting a new version on the Website whereby CASTEL will indicate the revision date at the top of the first page of this Privacy Statement. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

- **Other websites**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. CASTEL does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

- **Contact CASTEL**

If you have questions and/or remarks about this Privacy Statement or the manner in which CASTEL collects, uses and/or processes your personal data, please contact us:

- ✓ Via e-mail: privacy@castel-engineering.com
- or
- ✓ Via mail: 84 Rue de la Royenne, 7700 Mouscron (Belgium)

In case you are not satisfied with the way CASTEL handled your questions and/or remarks or have any complaints about the way CASTEL collects, uses and and/or processes your personal data, note that you have the right to lodge a complaint with the Data Protection Authority.