



Figurad

Policy on privacy and protection of personal data

Introduction

As a corporate auditing firm, we are responsible for the processing of large amounts of data. Some of these are personal data, and within this framework we wish to inform you of the following.

The personal data that we process can relate to you in your capacity of customer of the firm, but also to you as a business relationship of our customers (such as in the case that you are a supplier or customer of our customer). In any event, we must point out the following to you, as a **data subject** whose personal data are processed by us.

1. Party responsible for the processing of the personal data

Name: Figurad Bedrijfsrevisoren

Address: J-B de Ghellincklaan 21, 9051 Ghent

Status: Corporate auditing firm

Crossroads Bank for Enterprises number: BE0423.109.644

General telephone number: +32 9 243 60 20

General email address: audit@figurad.be

Website: www.figurad.be

Privacy:

Address: J-B de Ghellincklaan 21, 9051 Ghent

Telephone number: +32 9 243 60 20

Email address: privacy@figurad.be

2. Purposes for the processing of personal data

The firm processes the personal data for the following purposes:

A. Application of the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and restriction on the use of cash.

1° In application of article 26 of the Law of 18 September 2017, our firm must gather the following personal data relating to our clients and their mandatories: last name, first name, date and place of birth and, as far as possible, address.

2° In application of article 26 of the Law of 18 September 2017, our firm is obliged to gather the following personal data concerning the beneficial owners of the clients: last name, first name and, as far as possible, date and place of birth and address.

The processing of these personal data is a statutory obligation. Without these data we cannot enter into a business relationship (art. 33 of the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and restriction on the use of cash).

B. The obligations resting on the firm vis-à-vis the Belgian government, foreign governments or international institutions in fulfilment of a statutory or regulatory obligation, in execution of a judicial decision, or within the framework of the pursuit of a lawful interest via (inter alia but not exclusively) the current and future tax (e.g. VAT listings, tax forms) and social security laws compel us, within the framework of the assignment entrusted to us, to process personal data.



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The processing of these personal data is a statutory obligation, and without these data we cannot enter into a business relationship.

C. Execution of an agreement on accounting and tax services. The processing of the personal data concerns the data of the clients themselves, their personnel members, their directors and so on, as well as those of the other persons who e.g. are involved in the activity as customer or supplier.

Without the provision and processing of these data we cannot properly perform our assignment as company auditor.

3. What personal data and from whom?

Within the framework of the purposes mentioned under point 2, our firm can process the following personal data: first name, last name, e-mail address, biometric data (copy of e-id or passport), address, enterprise number, national number, etc.

The firm processes the personal data that the data subjects themselves or their relatives have furnished.

The firm also processes personal data that were not supplied by the data subject himself, such as personal data that were furnished by the client concerning its employees, directors, customers, suppliers or shareholders.

The personal data can also derive from public sources such as the Crossroads Bank for Enterprises, the Belgian Official Journal and its annexes, the National Bank of Belgium (Central Balance Sheet Office) and so on.

The data are only processed in so far as necessary for the purposes mentioned under point 2.

The personal data are not passed on to third countries or international organisations.

4. Recipient of data

In accordance with the foregoing and except to the extent that the communication of personal data to organisations or entities whose intervention as third service providers for the account and under the control of the processor is required in order to achieve the aforementioned purposes, the firm will not communicate, sell, rent out or exchange the personal data collected within this framework with any other organisation or entity, unless you were informed thereof in advance and expressly gave your consent for this.

The firm does make use of *third service providers*:

- The firm uses audit software (caseware).

The firm can take all measures that are necessary in order to ensure a proper management of the website and its computer system.

The firm can pass on the personal data at the request of any legally competent government authority, or even at its own initiative, if it believes in good faith that passing on this information is necessary in order to comply with the legislation and the regulations, or in order to defend and/or protect the rights or the goods of the firm, its customers, its website and/or you.



5. Security measures

In order to prevent, as far as possible, unauthorised access to the personal data collected within this framework, the firm has set up security and organisational procedures that relate to both the collection of these data and their retention.

These procedures are also applicable to all processors whose services the firm calls upon.

6. Retention period

6.1. Personal data that we must retain pursuant to the Law of 18 September 2017 (see 2.A.)

This concerns the identification data and the copy of the supporting documents about our clients, the internal and external mandatories as well as the beneficial owners of our clients.

These personal data are retained, in accordance with article 60 of the Law of 18 September 2017, until at the latest ten years after the end of the business relationship with the client or counting from the date of an occasional transaction.

6.2. Other personal data

The personal data of persons other than those mentioned above are only retained during the periods as provided in the applicable legislation such as the accounting laws, the tax laws and the social security laws.

6.3. After expiry of the aforementioned periods the personal data are deleted, unless some other applicable legislation provides for a longer retention period.

7. The rights of access and rectification, the right to be forgotten, the rights to data portability, objection, non-profiling and concerning notification of security breaches

7.1. Concerning the personal data that we must retain in application of the Law of 18 September 2017

This concerns the personal data of our clients, the mandatories and the beneficial owners of the clients.

With regard to the exercise of the rights of access, rectification, aggregation, data portability, objection, non-profiling and security breach notification, please refer to Article 65 of the Act of 18 September 2017:

"The person to whom the processing of personal data applies by virtue of this law does not benefit from the right of access and rectification of his data, nor from the right to be forgotten, to data portability or to raise objections, nor from the right not to be profiled, nor from notification of security deficiencies.

The right of access by the person concerned to the personal data concerning him or her is exercised indirectly, by virtue of article 13 of the aforementioned law of 8 December 1992, with the Commission for the Protection of Privacy established by article 23 of the same law.

The Commission for the Protection of Privacy only informs the applicant that the necessary verifications have been carried out and of the result thereof as far as the lawfulness of the processing in question is concerned.



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These data may be communicated to the applicant when the Commission for the Protection of Privacy, in consultation with the CFI and after having obtained the opinion of the controller, on the one hand, establishes that the communication of these data is not susceptible of disclosure of the existence of a suspicion referred to in Articles 47 and 54, of the consequences thereof or of CFI' s exercise of its right to request additional information pursuant to Article 81, nor is it likely to jeopardise the objective of the fight against ML/FT, and on the other hand finds that the data in question relate to the applicant and are kept by subject entities, CFI or the supervisory authorities for the purposes of this Law.”

For the application of your rights concerning your personal data, please address the Data Protection Authority (see point 8).

7.2. All other personal data

For the application of your rights concerning all other personal data, you can always contact Figurad Bedrijfsrevisoren BV.

8. Complaints

You can file a complaint concerning the processing of the personal data by our firm with the Data Protection Authority:

Data Protection Authority

Rue de la Presse 35, 1000 Brussels

Tel.: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

E-mail: contact@gba.be

URL: <https://www.gegevensbeschermingsautoriteit.be>