

NAYM VZW Privacy Policy

NAYM VZW is committed to the protection of personal data and privacy rights.

This NAYM VZW Privacy Policy consists of the NAYM VZW Personal Data Protection Basic Policy and the Policy for the Handling of Personal Data on NAYM VZW Websites. It describes how NAYM VZW processes personal data in compliance with applicable data protection and other laws and globally accepted data protection principles including the national data protection laws and the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, "GDPR").

This Privacy Policy applies to all activities where NAYM VZW processes personal data of individuals excluding NAYM VZW's personnel, which is governed by internal regulations. Data are personal, if the information contained therein relates to an identified individual or an individual that can be identified, directly or indirectly, by reference to an identifier or a combination of identifiers. Processing means any operation or set of operations on personal data whether or not by automated means and regardless whether electronically, physically in paper or any other form.

This Privacy Policy supplements the applicable data protection and other laws without replacing them. In case of a conflict or where an applicable law has stricter or additional requirements the law will take precedence over this Privacy Policy.

By accessing, browsing, or using NAYM VZW's website, you agree to the Terms of Use of the NAYM VZW Website, this NAYM VZW Privacy Policy and the NAYM VZW Cookie Policy that supplements this Privacy Policy in respect of the use of Cookies on the NAYM VZW Website.

NAYM VZW Personal Data Protection Basic Policy

1. Scope of Application

This NAYM VZW Personal Data Protection Basic Policy is part of NAYM VZW's Privacy Policy and describes the general rules how NAYM VZW processes personal data.

2. Personal Data Processing Principles

NAYM VZW processes personal data in accordance with the following principles:

(1) Lawfulness, Fairness and Transparency

Personal data are processed on basis of the applicable legal permission and in compliance with applicable laws (lawfulness), in consideration of the interests of the affected individual (fairness) and together with reasonable provision of information including the identity of the legal person that controls and is accountable for the processing of personal data (data

controller), the purpose of the processing, associated risks, and necessary safeguards (transparency).

(2) Purpose Limitation

Personal data are processed for a specified, explicit and legitimate purpose and are no further processed in a manner that is incompatible with that purpose.

(3) Data Minimization

Personal data are adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.

(4) Accuracy

Personal data are kept accurate and, where necessary, up to date; every reasonable step is taken to ensure that personal data that are inaccurate in respect to the purpose for which they are processed, are erased or rectified without delay.

(5) Storage Limitation

Personal data are kept in a form which permits identification of the affected individual for no longer than necessary for the purpose for which the personal data are processed.

(6) Integrity and Confidentiality

Personal data are processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures. Personal data protection is taken into account when new processes are planned and implemented. Technical and organizational measures at NAYM VZW are continuously adjusted.

3. Business Partner Data

In course of its business operations, NAYM VZW processes data of its customers, suppliers, agents, providers, sub-contractors, consultants, advisors, journalists, users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements and other current and potential business partners ("Business Partners"). These data may also include personal data of Business Partners and in case Business Partners are corporations, of individuals affiliated with Business Partners.

3.1 Data Categories

Data processed include first, middle and last name, academic title, professional status, position, postal address, e-mail address, telephone number, login-in data, online identifiers,

IP addresses and other personal data reasonably related to the business relationship with NAYM VZW.

3.2 Data Sources

Personal data are obtained through direct and indirect online and offline sources. Direct sources include business cards, e-mails, facsimiles, letters, surveys, data collected via active entries on NAYM VZW's website and other electronic or non-electronic communication and interaction between NAYM VZW and an individual in course of a potential or existing business relationship. Indirect sources include publicly available data collected by NAYM VZW, data of users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements and data received from third parties in compliance with applicable laws.

3.3 Processing Purposes

Personal data are processed for NAYM VZW's business operations, including Business Partner relationship management, research and development, manufacturing, enterprise resource planning, data analysis for supply, online and offline marketing and sales activities, market observance and orientation, provision of product and service information, making and answering requests and inquiries, making and accepting quotes, offers, and any communication, cooperation, and other activities reasonably related to NAYM VZW's business operations.

Data analysis activities may comprise automated processing including the profiling of individuals affiliated with Business Partners. NAYM VZW may in particular combine data from the above-described direct and indirect online and offline sources and analyze or predict preferences, interests, reliability, behavior, location, movements and other activities of Business Partners and in case Business Partners are corporations, of individuals affiliated with Business Partners. NAYM VZW conducts such analysis activities to understand the needs of its Business Partners, in particular to enhance, develop, present and provide new products to them, online and offline.

Online activities include targeted advertisements on NAYM VZW's website and in user accounts, online newsletters by e-mail or other electronic means, promotional campaigns and other activities reasonably related to NAYM VZW's business operations.

Offline activities include the delivery of marketing and other promotional material including samples by mail and other activities reasonably related to NAYM VZW's business operations.

3.4 Permission

Personal data are processed in compliance with applicable laws on basis of the applicable legal permission, in particular the initiation and performance of a contract, where the individual has given consent to the processing, where the processing is necessary for compliance with a legal obligation to which NAYM VZW is subject to and where the

processing of personal data is in the legitimate interest of NAYM VZW. Legitimate interests are the development, nurturing and enhancement of existing and initiation of new business relationships and any activities related thereto to pursue NAYM VZW's business operations.

4. Recruitment Data

In course of its business operations, NAYM VZW processes data related to the recruitment of new personnel. These data may also include personal data of individuals.

4.1 Data Categories

Data processed include first, middle and last name, academic title, professional status, position, birth date, personal status, work history, current position and former positions, education, postal address, e-mail address, telephone number, login-in data, online identifiers, IP addresses and other personal data reasonably related to the recruitment of new personnel.

4.2 Data Sources

Personal data are obtained through direct and indirect online and offline sources. Direct sources include business cards, job applications, e-mails, facsimiles, letters, meetings, entries on NAYM VZW's website and other electronic or non-electronic communication and interaction between an individual and NAYM VZW in course of a job application. Indirect sources include publicly available data, data of users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements and data received in compliance with applicable laws from third parties.

4.3. Processing Purposes

Personal data are processed for searching and recruiting new personnel for NAYM VZW's business operations including any activities reasonably related thereto.

4.4. Permission

Personal data are processed in compliance with applicable laws on basis of the applicable legal permission, in particular where necessary for the job application and the initiation of an employment relationship with NAYM VZW, where the individual has given consent to the processing, where the processing is necessary for compliance with a legal obligation to which NAYM VZW is subject and where the processing of personal data is in the legitimate interest of NAYM VZW. Legitimate interests are the processing of the job application to find and recruit skilled personnel for NAYM VZW.

5. Website Data and Cookies

For information about the processing of personal data on NAYM VZW's website and third party websites, please refer to Policy for the Handling of Personal Data on NAYM VZW Websites and to the NAYM VZW Cookie Policy.

6. Retention Periods

Personal data will be removed from NAYM VZW's systems and records and/or steps are taken to anonymize data if processing is no longer required for the original purpose unless it is necessary to keep personal data to comply with a legal obligation to which NAYM VZW is subject, e.g. statutory retention periods under applicable laws including commercial and tax laws or where NAYM VZW has a legitimate interest to retain information in compliance with applicable laws, e.g. for filing, enforcing or defending legal claims. NAYM VZW has installed and maintains retention policies in compliance with applicable data protection and other laws.

7. Transfer of Personal Data

NAYM VZW may transfer data including personal data to Business Partners, courts, law enforcement agencies, government authorities, other public bodies and other third parties, which may have access to and/or process personal data. Transfers are made on a need to know basis in compliance with applicable laws and agreements with Business Partners.

7.1 Transfer to Business Partners

Purpose of data transfers to Business Partners is to outsource internal functions and utilize external resources, e.g. IT services, HR, recruiting, marketing activities, marketing data analysis, administration of campaigns, offline and online advertisement, publishing, design, legal, tax, financial advisory services and other activities reasonably related to NAYM VZW's business operations.

Business Partners that act as service providers for NAYM VZW are contractually bound to take appropriate technical and organizational security measures to safeguard and process personal data only as instructed by NAYM VZW. The same applies to any sub-providers of Business Partners' service providers.

7.2 Transfer to government authorities, courts, law enforcement agencies

Purpose of data transfer to government authorities, courts, law enforcement agencies and other public bodies is to comply with obligations to which NAYM VZW is subject to under applicable laws, e.g. -transfer and disclosure obligations under social security law, civil procedure law, tax, import and export laws.

8. Transfer of Personal Data to other Countries

To the extent personal data are transferred to and processed in other countries than where NAYM VZW is established, NAYM VZW transfers personal data in compliance with applicable laws and has established appropriate safeguards by means of data processing and data transfer agreements that oblige the recipient in the other country to establish and adhere to an adequate level of data protection.

9. Information Obligations

In compliance with applicable laws, NAYM VZW informs individuals about its personal data processing activities as described in the NAYM VZW Privacy Policy and the NAYM VZW Cookie Policy. NAYM VZW provides amongst others on and offline references to the NAYM VZW Privacy Policy on NAYM VZW's website, electronic or non-electronic communication with individuals and electronic or non-electronic business documents to promote its data privacy activities.

10. Consent and Withdrawal of Consent

Where required under applicable data protection and other laws, NAYM VZW processes any data only after consent. Providing consent and data is voluntary. Before obtaining consent, NAYM VZW will duly inform each individual about the respective processing activity. Without providing data, an individual may not be able to engage with NAYM VZW in respect of NAYM VZW's business operations.

A consent can be withdrawn at any time with future effect by e-mail to info@naym.be or by sending a withdrawal notice to the contact stated under 12. below. A withdrawal will not affect the lawfulness of the processing prior to the withdrawal.

11. Rights of Individuals

Where NAYM VZW processes personal data of individuals, each individual may exercise its rights under applicable laws.

Any rights can be exercised by sending an e-mail to info@naym.be or to the contact details stated under 12. below.

In addition, each individual may lodge a complaint with a competent data protection supervisory authority.

Under the applicability of the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, "GDPR") any individual may exercise towards NAYM VZW the following rights:

- Right of Access,
- Right of Rectification,

- Right to Erasure,
- Right to restriction of processing,
- Right to object to processing,
- Right to data portability,
- Where NAYM VZW processes personal data for direct marketing purposes, each individual has the right to object at any time to the processing of its personal data for direct marketing purposes, which includes profiling to the extent related to marketing purposes.

12. NAYM VZW Personal Data Protection Organization

NAYM VZW, Avenue Albert 161, 1190 Vorst, ondernemingsnr: 0899.378.060 controls and is accountable for the processing of personal data within its operations (data controller).

NAYM VZW maintains a personal data protection organization, which serves as point of contact for all inquiries regarding the processing of personal data by NAYM VZW.

13. Change Management

NAYM VZW may change the NAYM VZW Personal Data Protection Basic Policy, the Policy for the Handling of Personal Data on NAYM VZW Websites and the NAYM VZW Cookie Policy at any time and without explicit notice. The enactment date and the date of the last revision is shown in the respective document and any prior versions can be requested from NAYM VZW.

Policy for the Handling of Personal Data on NAYM VZW Websites

1. Scope of Application

This Policy for the Handling of Personal Data on NAYM VZW Websites is part of NAYM VZW's Privacy Policy.

It describes how NAYM VZW processes data of users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements ("Users"). These data include also personal data that Users actively send, transmit or otherwise provide on NAYM VZW's website and that NAYM VZW collects or otherwise obtains via cookies.

For detailed information about the use of cookies please refer to the NAYM VZW Cookie Policy.

2. Purposes

2.1 Services

NAYM VZW processes data including personal data for providing the following services in connection with its business operations (“Services”):

2.1.1 User Accounts

After registration, NAYM VZW offers personalized User accounts that allow access to product information and services and other information reasonably related to NAYM VZW's business operations.

2.1.2 Inquiries and Requests

NAYM VZW offers the possibility to make online inquiries and requests regarding its products and services and strives to revert to the inquirer in due time.

2.1.3 Newsletters

After registration, NAYM VZW offers online newsletters by e-mail or other electronic means. Newsletters comprise information about NAYM VZW's products, services, events, seminars, exhibitions, campaigns and other information reasonably related to NAYM VZW's business operations.

2.1.4 Information Download

After registration, NAYM VZW offers information about products and services and other information reasonably related to NAYM VZW's business operations.

2.1.5 Promotional Campaigns

NAYM VZW invites Users to take part in online promotional and other campaigns to bring NAYM VZW's products and services and other information reasonably related to NAYM VZW's business operations to the attention of current and potential customers and the wider public. NAYM VZW asks individuals to provide their comments and opinions about NAYM VZW's products and services. NAYM VZW may also send materials and samples and other giveaways and information offline to Users participating in the campaigns.

2.1.6 Recruitment

NAYM VZW may offer information about job vacancies of any kind on its website and invite individuals to file applications via NAYM VZW's website.

2.1.7 PC and Mobile Application Software

NAYM VZW offers software for specific services and functions alone or in together with NAYM VZW's products, services and other activities reasonably related to NAYM VZW's business operations. NAYM VZW provides certain support services like software and

firmware support. Software applications may create crash reports that help NAYM VZW and third party software developers to resolve any issues with the software.

Where required under applicable data protection and other laws, NAYM VZW processes data only after the consent of the User. Providing consent and data is voluntary. Before obtaining any consent, NAYM VZW will duly inform each individual about the respective processing activity. Without providing data, a User may still access, browse or otherwise use NAYM VZW's website but may not be able to benefit from some or all of the Services.

Regarding the withdrawal of a consent and other rights of Users, please refer to the NAYM VZW Personal Data Protection Basic Policy.

2.2 Marketing

For its marketing activities NAYM VZW processes data that Users have actively sent, transmitted or otherwise provided on NAYM VZW's website for Services (see 2.1 above) and that NAYM VZW has collected or otherwise obtained via cookies from its and third party websites where NAYM VZW has posted advertisements. For detailed information about the use of cookies please refer to the NAYM VZW Cookie Policy.

NAYM VZW analyses such data alone or in combination or together with other data including personal data NAYM VZW has lawfully received. Data analysis activities may comprise automated processing including profiling. NAYM VZW may in particular combine data from the above-described direct and indirect online sources and offline sources and analyze or predict preferences, interests, reliability, behavior, location, movements and other activities of Users. NAYM VZW conducts such analysis to understand the needs of the Users, in particular to enhance, develop, present and provide new products to them, online and offline.

Online activities include targeted advertisements on NAYM VZW's website and in User accounts, online newsletters by e-mail or other electronic means, promotional campaigns and other activities reasonably related to NAYM VZW's business operations.

Offline activities include the delivery of marketing and other promotional material including samples by mail and other activities reasonably related to NAYM VZW's business operations.

Where required under applicable data protection and other laws, NAYM VZW processes data only after the consent of the User. Providing consent and data is voluntary. Before obtaining any consent, NAYM VZW will duly inform each individual about the respective processing activity. Without providing data, a User may still access, browse or otherwise use NAYM VZW's website but may not be able to benefit from some or all of the Services.

Regarding the withdrawal of a consent and further rights of Users, in particular to object at any time to the processing of its personal data for direct marketing purposes, which includes profiling, please refer to the NAYM VZW Personal Data Protection Basic Policy.

NAYM VZW Cookie Policy

1. Scope of Application

This NAYM VZW Cookie Policy describes how NAYM VZW collects or otherwise obtains, via Cookies, data of users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements ("Users"). These data may include also personal data.

This NAYM VZW Cookie Policy supplements the NAYM VZW Privacy Policy in respect of the use of Cookies on the NAYM VZW Website.

2. Cookies

Cookies are small files, usually composed of alphanumeric characters, issued by NAYM VZW's website or third party providers ("Cookies") and stored on computers, tablets, smart phones and other devices ("Devices") of Users that access, browse or otherwise use NAYM VZW's website or third party websites on which NAYM VZW has posted advertisements.

3. Types of Cookies

Cookies are usually classified into (i) Session Cookies and Persistent Cookies, and (ii) in First Party Cookies and Third Party Cookies, which will be explained in the following.

3.1 Session Cookies

Session Cookies ensure that a User can use functions and refer to information on the NAYM VZW website in an efficient way. For example, they ensure that a User is not required to enter the same information repeatedly while using the NAYM VZW website. They are stored in temporary memory and deleted when the web browser is closed.

3.2 Persistent Cookies

Persistent Cookies are stored on the hard disk of the User's device and are not deleted if the web browser is closed. For example, they are used to save a setting that ensures a User can use the same language when he/she visits next time and to record the number of visits. The period these Cookies are stored varies from Cookie to Cookie.

3.3 First Party and Third Party Cookies

First Party Cookies are issued by NAYM VZW. Third Party Cookies are issued by third party service providers, which NAYM VZW uses, e.g. to embed certain functionalities on its website for social media content. In some cases, third party providers use further sub-providers that issue so called Fourth Party Cookies that come along with their service applications. Under this Cookie Policy and NAYM VZW's Cookie management system, Fourth Party Cookies are

treated as Third Party Cookies. This means that any setting a User applies to Third Party Cookies will also apply to any Fourth Party Cookies associated therewith.

4. Cookies used on the NAYM VZW Website

NAYM VZW uses Cookies for the following purposes:

Strictly Necessary Cookies: These Cookies ensure that the NAYM VZW website operates properly. They are technically necessary and NAYM VZW cannot switch off these Cookies in its systems without losing the operability of its website. They are usually only set in response to actions of Users on the NAYM VZW website, such as setting privacy preferences, logging in or filling in forms. You can set your browser to alert you about these Cookies and block them, but some parts of the NAYM VZW website may then not work and you may not be able to use some or all of the functions and services offered by NAYM VZW.

These Cookies do not store any personally identifiable data.

- viewed_cookie_policy
- cookielawinfo-checkbox-necessary
- CookieLawInfoConsent
- wordpress_test_cookie

NAYM VZW uses Google Analytics, third-party cookies for the purposes described above. Please refer to the terms of such service providers to understand how your data is handled by them. <http://www.google.com/policies/privacy/partners/>

Performance Cookies: These Cookies allow NAYM VZW to measure and analyze User activities on NAYM VZW's website to improve its performance. They usually measure traffic data including the number of Users that visit NAYM VZW's website, number of visits, pages Users view and website and location from which the visit originates. They help NAYM VZW to know which pages are the most and least popular, see where Users come from and how they move around on the NAYM VZW website. You can set your browser to alert you about these Cookies and block them, but NAYM VZW will not be able to monitor and improve the performance of its website for the benefit of Users.

These Cookies do not store any personally identifiable data; any data collected is aggregated and anonymous.

- Google Analytics

Marketing Cookies: These Cookies allow NAYM VZW to personalize the experience of Users on NAYM VZW's website and communicate with Users in the most relevant way possible. They usually record on-line activities, including websites Users visit, pages on the NAYM VZW website users view, and link information that Users submit on NAYM VZW's website pages

including web forms, to the information stored on the Cookie. NAYM VZW uses Cookies from third parties to recognize users when they return to NAYM VZW's websites and to understand which pages Users visit. You can set your browser to alert you about these Cookies and block them, but NAYM VZW will not be able to personalize your experience on NAYM VZW's website and to communicate with you in the most relevant way possible.

These Cookies may store personally identifiable data.

Social Media Cookies: These Cookies allow NAYM VZW to add and embed social media services of third party service providers on its website for sharing NAYM VZW's content. Each social media service provider may collect data including personal data through Cookies. These social media providers are capable of tracking your browser across other sites and building up a profile of your interests. This may affect the content and messages you see on other websites you visit. You can set your browser to alert you about these Cookies and block them, but you may not be able to see the social media embedded on NAYM VZW's website.

These Cookies may store personally identifiable data.

Please see [here](#) for a detailed list of the Social Media Cookies used. For more details than the information provided by NAYM VZW regarding the purpose and retention period of the Social Media Cookies used by third party providers, please kindly refer to the privacy and cookie policies of the providers.

5. How to manage Cookies

In most web browsers, it is possible to make a setting to notify receipt of Cookies being sent; that is, to select whether or not to receive Cookies. It is also possible to make a setting to render the Cookie function inoperable. You may use the NAYM VZW Website even if you make a Cookie function inoperable. However, blocking some types of Cookies may affect your experience of the NAYM VZW website and its functions and services.