

Privacy Notice

Who We Are

DIPSEC (*hereafter referred to as the Company*) gather and process your personal information in accordance with this privacy notice and in compliance with the EU General Data Protection Regulation (EU GDPR) and relevant laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

The Company's registered office is at Zandbergerstraat 36, B-3680 Neeroeteren, Belgium and with company number BE 0697.392.881.

Information That We Collect

The Company may process your personal information to meet our legal, statutory, contractual obligations, and to provide you with our products and services. Personal data is defined as any information relating to an identified or identifiable natural person, and that can be used to directly or indirectly identify a natural person. We will not collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect may include but not limited the following. Name Date of Birth Physical Address Email Address Email Address Telephone/GSM Number National Insurance Number Passport Number Driver's License Number We collect information in, but not limited to, the below ways. Online forms Website Orders Hardcopy forms and cards Documentation and communication containing personal identifiable information Telephone/GSM

How We Use Your Personal Data

DIPSEC takes your privacy very seriously and will not disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified at the point of collection. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

Our purposes for processing your personal data are outlined below.

- i. From your profile created on our website or you provide to us in any other means, we enter into contact or agreement with you.
- ii. We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address.
- iii. We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.
- iv. From contact form on our website, we use your personal data to reply to your requests.
- v. In the event you register for our newsletter, your contact information will be used send you our newsletters, invites to events, seminars, etc. organized by us.
- vi. Web systems data, including IP address, referral source or geographical location regarding the use of our website for the purpose of supporting the website and enhancing your user experience, which includes ensuring the security, availability, performance, capacity and health of the website.
- vii. We may also use your personal data to exercise or fulfil our obligations as set out by applicable laws.

Legitimate Interests



As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

Your Rights

You have the right to access any personal information that the Company processes about you and to request information about the following.

- i. What personal data we hold about you
- ii. The purposes of the processing
- iii. The categories of personal data concerned
- iv. The recipients to whom the personal data has/will be disclosed
- v. How long we intend to store your personal data for
- vi. If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

We will strive to correct or to act according to your request as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

Safeguarding Measures

The Company takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place. Some of these measures are SSL, TLS, encryptions, pseudonymisation, restricted access, firewalls, anti-virus/malware etc. Please, contact us for information about the security and protection measure at info@dipsec.eu.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. The Company sometimes may use third-parties to provide some services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, our data protection policy and any other appropriate confidentiality and security measures. They may process your data if your transactions with us involve the stated purpose. We shall update this Privacy Notice with their details if we enter into a contract with a third party processor.

Transfer of Personal Data

We process personal data according to the EU GDPR and we know that some other countries do not have the same high standard of protection for personal data. The Company does not transfer your personal data without your consent to organisations that do not meet the EU GDPR requirements.

The Company utilise some products or services (or parts of them) that may be hosted, transmitted, transported or stored in a different country, which means that we may transfer any information which is submitted by you through the website and online services.

Therefore, when you use our website/send us an email/sign up to our newsletter, etc., the personal information you submit may be stored on servers which are hosted in a different Country. Where this is the case, we will take steps to ensure that those providers comply with the EU GDPR and use the necessary level of protection for your information.

Consequences of Not Providing Your Data



You are not obligated to provide your personal information to the Company, however, as this information is required for us to provide you with our services and for your legitimate interests, we will not be able to offer some/all our services to you without you providing the requested information.

How Long We Keep Your Data

The Company retains personal information for as long as is necessary for the specified purpose or is required by Law. We have strict review and retention policies in place to meet these obligations and the minimum allowable period after which time it will be destroyed.

In the event you withdraw your consent or you object to our further use of your personal data, and such objection is successful, we will remove your personal data from our databases. Please note that we will retain the personal data necessary to ensure your preferences are respected in the future.

The foregoing will, however, not prevent us from retaining any personal data if this is necessary to comply with our legal obligations or legal purposes.

Special Categories Data

Owing to the services that we may offer, the Company sometimes needs to process sensitive personal information/special category data about you. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so. Where we rely on your consent for processing special category data, we will obtain your explicit consent through an explicit consent mechanism. You can modify or withdraw consent at any time, which we will act on, unless there is a legitimate or legal reason for not doing so.

Applicability

This Privacy Notice is applicable, for all intent, purposes, rights and obligations, to the processing of personal data of data subjects that fall under the EU GDPR. However, data subjects and users of our services that are not covered by the GDPR may, directly or indirectly and without any legal right or claim, enjoy the benefits of the privacy measures that we have put in place.

Lodging A Complaint

The Company only processes your personal information in compliance with this privacy notice and in accordance with the EU General Data Protection Regulation (EU GDPR) and relevant laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint at the contact details below.

DPO <u>info@dipsec.eu</u> Tel: +32 475 971 352 OR The Gegevensbeschermingautoriteit / Commission de la protection de la vie privée / Data Protection Authority, Drukpersstraat 35 / Rue de la Presse 35 1000 Bruxelles Tel. +32 2 274 48 00 Fax +32 2 274 48 35 e-mail: contact(at)apd-gba.be; commission(at)privacycommission.be Website: https://www.gegevensbeschermingsautoriteit.be/contact https://www.autoriteprotectiondonnees.be/contact https://www.privacycommission.be/