

Privacy Policy

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Introduction: Details about Intys Partners Privacy Policy

At Intys Partners, we respect the privacy of every person who visits our website ("you", "your"). This Privacy Policy explains how we collect your Personal Data (defined below) on the website of Intys Partners and its service providers that post or link directly to this Privacy Policy (collectively, the "Site") and through offline means, how we use, disclose, and protect such data, and the choices you have concerning our use of such data.

For the purposes of this Privacy Policy, "Intys Partners", "we", "us", and "our" means Intys Partners.

Please read this Privacy Policy carefully. Intys Partners may from time to time update this Privacy Policy. Any changes to this Privacy Policy will become effective when we post or link to the revised Privacy Policy on the Site. Please review the "Last Updated" legend at the top of this page to determine when this Privacy Policy was most recently revised.

Please note: this Policy applies to information collected by our Site, or other information provided to us that we may use to contact you. It does not apply to the websites of other companies, individuals

or organisations to which we provide links, or websites that link to ours. Please be aware that we are not responsible for the privacy practices or content of other such sites. We encourage you to read the privacy policies of each site that you reach via links from our website, as well as those you may have used to link to our website.

You do not have to provide us with any Personal Data to visit the Site. However, if you choose to withhold requested information, you may not be able to visit all sections or use all features of the Site.

1. Types of Data collected

You do not have to provide us with any Personal Data to visit the Site. However, if you choose to withhold requested information, you may not be able to visit all sections or use all features of the Site.

We gather Personal Data and Other Data (as described hereunder).

Personal data is information that identifies you or can be used to identify or contact you, e.g., your name, email address, address, or phone number ("**Personal Data**"). We may need to collect and process Personal Data in order to provide requested information, products or services to you (including the Site), because we are legally required to do so or because it is part of our legitimate interest (as explained under article 3 of this privacy policy).

- Intys Partners requests Personal Data from you if the Site requires registration. The registration process requests that you provide your name, business email address, business address, business phone number, and company affiliation, and agree to the User Agreement presented at the time of registration.
- Intys Partners may receive Personal Data from social media platforms. For example, if you elect to use your social media credentials to log-in to your Site account, certain Personal Data from your social media account will be shared with us, which may include Personal Data that is part of your social media profile.
- Intys Partners may collect Personal Data voluntarily provided by you (e.g. via our contact page), including in emails to the Site, online forms, order and registration forms, surveys, promotion participation, phone calls and online chats with Intys Partners support and through other means.
- Intys Partners collects information through various other means, including participation at conferences and events, individual introductions, from employers that enroll their employees in our services, and from selected third-party business partners.

2. Use of Personal Data Collected

We use your Personal Data for one of the following reasons:

- **Fulfillment of Requests.** Intys Partners may use Personal Data about you to deliver products and services to you, and provide you with information about products and services you have ordered. We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- **Administrative Communications.** Intys Partners reserves the right to use Personal Data to send to you important information regarding the Site, products, services, your account status, changes to the User Agreement, this Privacy Policy, or any other policies, agreements or transactions relevant to your use of the Site, products and/or services. Because this information may be important to your use of the Site, products and/or services, you may not opt-out of

receiving such communications. We will engage in this activity to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Other Business Purposes.** We may also use Personal Data about you for other business purposes, such as data analysis (for example, to improve the efficiency of our services), editorial and feedback purposes, providing customer support, customizing and improving the content and layout of the Site, completing business transactions (for example, to confirm content requested is received by customers), development of marketing and promotion plans and materials, statistical analysis of user behavior (for example, to understand what parts of the Site are of most interest to users), product development, market research, administering individual accounts, and meeting government regulatory requirements such as sales tax collection, audits, etc. We may also use Personal Data of journalist/media contacts for press release distribution or sharing other newsworthy developments related to our business activities. We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

3. Legal bases we rely on for the processing of your Personal Data

In accordance with the General Data Protection Regulation (“**GDPR**”) and the Belgian law of 30 July 2018 on the protection of individuals with regard to the processing of personal data, the legal bases on which we rely to process this personal data, are as follows:

- We rely on your (explicit) consent;
- We have various legal obligations (liability obligations, accounting and tax obligations requiring us to keep data usually for a period of 8 to 10 years);
- We have a legitimate interest in collecting your personal data and exchanging with you to respond to your requests or improve our services, prevent abuse and fraud, monitor the regularity of our services, exercise, defend and preserve our rights, for example in case of disputes, as well as to provide evidence of any violation of our rights, manage and improve our relationship with you, continuously improve our website and our products/services, unless these interests are overridden by your interests or your freedoms and fundamental rights requiring the protection of your personal data.

In any case, we ensure you that we maintain a proportionate balance between our legitimate interest and respect for your privacy.

If the legal basis for our processing is based on your consent, you have the right to withdraw it at any time.

4. Collection and Use of “Other Data”

We and our service providers may also collect and use the following types of non-personal data, referred to in this Privacy Policy as “Other Data”:

- **Monitoring Data.** Intys Partners and its service providers may collect and/or track other information such as demographic information, domain names, computer type, browser types, screen resolution, and other statistical data involving the use of the Site (“**Monitoring Data**”). We use Monitoring Data to help us understand who uses the Site and to improve and market it, as well as our other web sites and services.

Unless combined with Personal Data, Monitoring Data does not personally identify you or any other user, and we may use it for any purpose.

- **Aggregated Data.** We may aggregate Personal Data in a manner such that the end-product does not personally identify you or any other user of the Site, for example, by using information to calculate the percentage of our users who have a particular telephone area code. Such aggregate information may also be used for any purpose.
- **Cookies.** Please see our cookie policy.
- **Google Analytics.** We use Google Analytics, which uses cookies and other similar technologies, to collect and analyze information about Site use and to report on activities and trends. The service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to <https://policies.google.com/privacy/partners>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- **Verification.** We may use third-party services to verify that you are a human user. Any information collected as part of such verification is subject to the privacy policy of the third-party service provider.
- **IP Addresses.** When you visit and interact with the Site, we and our third-party service providers may collect Internet Protocol ("IP") addresses. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider ("ISP"). This number is identified and logged automatically in our server log files whenever you visit the Site, along with the time(s) of your visit(s) and the page(s) that you visited. We use IP addresses to understand how the Site is used by our users, to improve the Site and to enhance user experience of the Site. We may also derive your approximate location from your IP address.

If we are required to treat Other Data as Personal Data under applicable law, then we may use and disclose it for the purposes described above, as well as for the purposes for which we use and disclose Personal Data as detailed in this Privacy Policy.

5. Our Advertising

We may use third-party advertising companies to serve advertisements regarding products and services that may be of interest to you when you access and use the Site, our apps and other websites or online services, based on information relating to your access to and use of the Site and other websites or online services on any of your devices, as well as on information received from third parties.

To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>. You may download the AppChoices app at www.aboutads.info/appchoices to opt out of this practice in mobile apps.

6. Disclosure of Personal Data Collected

We may disclose Personal Data to third-parties for the following purposes:

- **Subcontractors and Third-Party Service Providers.** We may provide Personal Data to third-party service providers, who provide services to us, including but not limited to, data analysis, order fulfillment, payment processing, and other services (e.g. IT service providers for the secure hosting of your Personal Data). These subcontractors are carefully selected and are subject to an obligation of confidentiality.
- **Affiliate Communications.** Intys Partners may transfer Personal Data among our affiliates (a list of which can be found at <https://www.intyspartners.eu/what/> to allow our affiliates to contact you regarding products, programs, services and promotions that they believe may be of interest to you, and such affiliates may otherwise use your Personal Data in accordance with this Privacy Policy. If you would prefer not to receive marketing communications from Intys Partners or our affiliates, please see the "Your Rights" section below. Intys Partners will be the party responsible for jointly used Personal Data.
- **Strategic Partners and Co-Branded Sites.** From time to time, we may enter into a special relationship with another company that is not owned by or affiliated with Intys Partners to provide or promote joint products, services, applications, or features (together, "**Jointly Offered Items**"). These special relationships may include co-branded web sites ("**co-branded pages**"). Any information, including Personal Data, that you provide in connection with one of these Jointly Offered Items, and/or on one of these co-branded pages, will be shared with our third-party partners. You should check these third parties' web sites for information regarding their privacy practices. PLEASE NOTE THAT THIS PRIVACY STATEMENT DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES. If you do not want Personal Data about you shared with such third parties, please do not provide Personal Data in connection with the Jointly Offered Items and/or co-branded pages.
- **Third-Party Data Providers.** If you subscribe to a Intys Partners product or service that contains third-party data, we may be required to provide your Personal Data to the third party as part of our reporting obligations. We will only do so if a third-party data provider conditions your receipt of their data on knowing your identity.
- **Conferences and Events Organisers.** When you attend a conference or event organized by Intys Partners, your name and contact information may be shared with other attendees unless you inform us otherwise.
- **Third-party Sponsors.** We may share the Personal Data you provide in connection with Promotions with third-party sponsors of such Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to those Promotions.
- **Assignment.** We may disclose or transfer any and all Personal Data that we collect to an affiliated entity or a third party (and their respective advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- **Law Enforcement; Emergencies and/or Compliance entities.** We may use and disclose Personal Data about you to others as we believe to be appropriate: (a) in compliance with laws, rules, or

regulations in any country in which Intys Partners operates, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from government or public authorities, including government and public authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any affiliated entities; (f) to protect the rights, privacy, safety or property of Intys Partners, its affiliated entities, you, or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest extent the law allows, disclose Personal Data about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities or to law firm managing disputes on our behalf.

7. Your rights

Under data protection legislation and subject to our own rights and obligations, you have the following rights:

Right of Access: you have the right to request access to your Personal Data from us, free of charge, and to obtain a copy in an accessible format.

Right of rectification: you have the right to ask us to rectify Personal Data that you consider to be inaccurate. You also have the right to ask us to complete your information.

Right of erasure: you have the right to ask us to delete your Personal Data in certain circumstances.

Right to processing restriction: you have the right to ask us to restrict the processing of your Personal Data in certain circumstances.

Right to object to the processing: you have the right to object to the processing of your Personal Data in certain circumstances.

Right to data portability: you have the right to ask us to return your Personal Data to you in an easily transferable format or, if technology permits, to transfer it directly to another service provider.

To exercise these rights, simply send us an email with proof of your identity to the following address: privacy@intys.eu.

Please note that we may need to verify your identity before implementing your request.

We will then do everything in our power to do what is necessary as soon as possible.

Should you not be satisfied with our answer, you also have the right to file a complaint with the Data Protection Authority, whose contact details are as follows:

Rue de la Presse, 35, 1000 Brussels

Tel: +32 (0)2 274 48 00

E-mail: [contact\(at\)apd-gba.be](mailto:contact(at)apd-gba.be)

8. Your Choices regarding marketing purposes

We give you choices regarding our use and disclosure of your Personal Data for marketing purposes.

- If you no longer want to receive marketing-related emails from us on a going-forward basis, you may stop receiving these marketing-related emails by sending an e-mail to in privacy@intys.eu [please mark your email "Unsubscribe".]
- If you would prefer that we do not share your Personal Data on a going-forward basis with our affiliates or with unaffiliated third parties for their marketing purposes, you may cease this sharing by sending an e-mail to privacy@intys.eu [please mark your e-mail "Cease Sharing".]

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you exercise the second option as described above, we will not be able to remove your Personal Data from the databases of our affiliates or unaffiliated third parties with which we have already shared your Personal Data (i.e., to which we have already provided your Personal Data as of the date that we implement your request). Further, please note that requesting us not to share your Personal Data with affiliates or unaffiliated third parties may result in you no longer receiving any marketing emails from Intys Partners. Please also note that if you choose not to receive marketing-related messages from us, we may still send you important administrative messages, and you cannot elect to stop receiving such administrative messages, unless you choose to stop receiving services from us.

You may also indicate your choices regarding marketing-related emails by contacting us via postal mail or telephone using the "Contact Information for Intys Partners" below.

9. Links

The Site may contain links to other Internet web sites, including social media sites and third-party hosted collaboration tools. These linked sites are not under Intys Partners control. We provide links only as a convenience, and Intys Partners does not endorse or control, and is not responsible for, the privacy practices or the content of these linked sites. If you provide any Personal Data through any third-party web site, or choose to communicate with us using third-party collaboration tools or other social media platforms, your transaction will occur on that third party's web site (not the Site) and the Personal Data you provide will be collected by, and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

PLEASE NOTE THAT THIS PRIVACY POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES, INCLUDING, WITHOUT LIMITATION, AFFILIATED ENTITIES THAT DO NOT POST OR LINK DIRECTLY TO THIS PRIVACY POLICY.

10. Security Measures

Intys Partners has established reasonable organizational and technical measures to protect Personal Data within our organization from loss, misuse, or unauthorized access, disclosure, alteration or destruction. Please note that while Intys Partners has endeavored to create a secure and reliable Site for users, no site is 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us of the problem immediately by contacting us using the information provided below in "Contact Information for Intys Partners" (note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem).

11. Data Integrity

Intys Partners will use Personal Data only in ways that are compatible with the purposes for which it was collected, authorized by this Privacy Policy, or authorized by you. Intys Partners will take reasonable steps to ensure that Personal Data is relevant to its intended use, and is accurate, complete, and current (as provided by you). Intys Partners depends on you to update or correct your Personal Data whenever necessary.

12. Retention Period

We will retain Personal Data about you for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

13. Cross Border Transfer of Personal Data

Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Data.

If you are located in the European Economic Area (“EEA”): Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available on the EU Commission’s adequacy list online at: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your Personal Data.

14. Use of this Site by Minors

This Site is not directed to individuals under the age of eighteen (18) years old, and we request that these individuals do not provide Personal Data through this Site.

If you learn that your minor child has provided us with their personal data without your consent, please contact us at the following address: privacy@intys.eu

15. Sensitive Personal Data

We ask that you not send us, and you not disclose, any sensitive Personal Data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through this Site or otherwise to us.

16. Contact Information for Intys Partners

Questions or concerns regarding Intys Partners data protection practices should be addressed to:

Intys Partners

Avenue de Tervueren 270, 1150 Brussels Belgium

E-mail: privacy@intys.eu

BCE 0845.769.328

If you choose to contact Intys Partners via e-mail about this Privacy Policy, please mark the subject heading of your e-mail "Privacy Policy."

17. What to do in case of dispute?

Long trials do not benefit anyone. In the event of a dispute between us, we commit to give priority to dialogue and openness in the search for an amicable solution. You can also contact your Data Protection Authority.

In the absence of an amicable settlement, disputes will be subject to Belgian law and to the exclusive jurisdiction of the courts of the judicial district of Brussels.