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### ***Personal information***

This privacy statement is aimed to inform you with regard to the processing of personal information carried out by ABCommunication.

ABCommunication BVBA is a company with registered seat at 3300 Tienen, Aststraat 245 and with Crossroads Bank for Enterprises (KBO) number 0628.968.586.

In the event you use our website, PR- or influencer services, we process your personal information ("personal data").

The lawfulness of processing, the security and integrity of personal data is essential for us.

For this reason we process your personal data in accordance with 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, and repealing Directive 95/46/EC (General Data Protection

Regulation or “GDPR”) and the Law of December 7<sup>th</sup> of 1992 on the protection of privacy in relation to the processing of personal data (“Privacy Act”).

### ***Processing of personal data***

“Personal data” means any information relating to an identified or identifiable natural person, such as your name, your identification number, your location data, an online identifier, your IP-address, your contact information, personal features, as well as contracts entered into by you and other documents that allowing the identification of the data subject.

“Processing” means every possible operation performed on your personal data, from the collection to the making available to the erasure thereof.

We are responsible for processing your personal data, unless we process your personal data on behalf of our commercial partners. In the latter case, our commercial partner is responsible for processing your personal data. In certain cases, we will be jointly responsible for the processing of your personal data.

By commercial partners we understand both our clients as well as every other (commercial) partner of ABCommunication. In the event we process your personal data jointly with or on behalf of our commercial partners, we will always indicate this clearly.

### ***Personal data processed by us***

*The collection and processing of personal data (whether or not jointly with one of our commercial partners)*

You are free to communicate your (personal) data.

Keep in mind that we can refuse answering your question, entering into agreements and delivering our products/services if you do not provide us with your personal data or when you do not complete the registration form on our website.

We do not collect directly identifying information about you, unless you yourself provide us with your personal data, e.g. by registering as an Influencer in the registration form or when you contact us directly by e-mail.

We will, however, process certain non-directly identifying data when you visit our website, such as the type of browser you are using, the operating system you are using, your IP address, etc. This is described in more detail in our [Cookie Policy](#).

You alone are responsible for the accuracy of the personal data that you provide us.

### ***Processing of personal data on behalf of our commercial partners***

We process certain personal data on behalf of our commercial partners, i.e. personal data that allows us to send press mailings, press kits, review products, contest prizes or to send information or review products to our Influencers.

This kind of processing takes place on the basis of an agreement with our commercial partner. In the event we process personal data on behalf our commercial partners, our commercial partner guarantees the appropriate collection and the lawful processing of your personal data. We are in no way responsible for the lawfulness of the processing by our commercial partner, which is not included in our instruction.

## ***Purposes of processing your personal data***

*Processing of personal data for which we are responsible (whether or not jointly with one of our commercial partners)*

Firstly, we will process your personal data in order to comply with our contractual obligations. In this case we process your data for the following purposes:

- Taking measures to verify your (personal) data at the registration as a Influencer;
- Delivering and invoicing our services offered through our website (PR services, Influencer marketing services);
- Maintain, expand and update our database of journalists, Influencers and commercial partners;
- Managing our customer base;
- When you apply for a job through the website, we process your personal data in order to contact you and to follow up your application. The processing of your personal data for this purpose is based on your request to take steps prior to entering into a contract.

Secondly, we process your personal data in the event processing is necessary for the purposes of the legitimate interests pursued by the controller, such as the following purposes:

- Exercising fundamental rights, such as initiating a legal action;
- Preventing the fraudulent use of our website;
- The technical administration of the website;
- Prospection and marketing;
- Building a recruitment reserve following a job application after which we did not recruit the applicant.

Additionally, by agreeing with this privacy statement you give us your consent to process your personal data for the following purposes:

- Contact you in order to answer your question or observation;
- Provide you with actual information regarding the press releases and news letters to keep you informed with regard to our products and services and or products/services of our commercial partners.

Personal data collected through cookies, shall only be used for statistical purposes. The cookies used by our website are mentioned in our [Cookie Policy](#).

## ***Processing personal data on behalf of a commercial partner***

In the event we process your personal data on behalf of our commercial partners, we only process the personal information based upon a processing contract and/or a written order of our commercial partner. We have the right to engage our own processors (so-called sub-processor).

Please contact our commercial partner in the event you have questions relating to the processing of your personal data we received from the commercial partner, the lawfulness of processing or the purpose thereof.

### *Purposes not provided in this privacy statement*

In the event we intend to process your personal data for a purpose not provided in this privacy statement, we shall contact you by e-mail. You will always have the possibility to refuse the processing of your personal data for the additional purpose.

### ***Confidentiality***

All personal data shall be regarded as strictly confidential and shall not be made available in any way to third parties, except when you give your express consent prior to processing your data or when the data is made available to external service providers and/or sub-processors in order to make the delivery of our products and/or services possible.

### ***Withdrawal of your consent***

If the processing of your personal data is based on consent, you can always withdraw your consent by ways of a written or electronic request accompanied by a copy of your identity card.

Such a withdrawal is not possible if the processing based upon a contract or legitimate interests pursued by the controller. In this case, the withdrawal does not affect this processing.

The withdrawal of consent does not affect the lawfulness of the processing that has taken place before the withdrawal of your consent.

### ***Retention period of personal data***

Your personal data shall only be stored for the period that is necessary for the purposes for which the personal data are processed and/or to abide by our contractual obligations.

We store your personal data for a maximum period of five years after you are no longer a client or our contractual relationship has been terminated. The personal data of journalists and Influencers that have requested to be removed from the database, shall be erased immediately. Personal data we process on behalf of commercial partners, shall be erased after the execution of the processing activities. These terms apply subject to special legal provisions that provide for a shorter/longer retention period.

Personal data processed in order to answer a requested/consideration submitted via the forms on our website, will be erased after a maximum retention period of one year after you send your message.

### ***Your rights***

#### *Right of access, correction and erasure*

You have the right to access your personal data, to rectify inaccurate or incomplete personal data or erasure of your personal data.

Such erasure is only possible if the processing of your personal data is not indispensable for entering into, or performance of a contract with us or the establishment, exercise or defence of legal claims.

### *Restriction of processing*

In certain cases you have the right to obtain the restriction of processing, i.e. (1) if you contest the accuracy of the personal data, (2) the processing is unlawful and you oppose the erasure of the personal data and (3) we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims. In this case we will only store your personal data.

### *Portability of personal data*

You have the right to receive your personal data which you have provided us or to have this data transmitted to another controller where it is technically feasible. The reception or transmission is not possible if your personal data is still necessary for the execution of our contractual obligations or the establishment, exercise or defence of legal claims.

### *Automated individual decision-making*

You have the right to not to be subject to a decision based solely on automated processing which produces legal effects concerning yourself or similarly significantly affects you. You cannot invoke this right if the decision is necessary for entering into, or performance of a contract with us or is based on your explicit consent.

### *Objection*

In the event the processing of your personal data is based on necessity for the performance of a task carried out in the public interest or purposes of the legitimate interests pursued by us or a third party, you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data. Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning yourself for such marketing.

### ***Exercising your rights***

You can exercise these rights by sending us a written or electronic request or, when applicable, by means of providing a supplementary statement, accompanied by a copy of your identity card.

In the event we believe you are not entitled to exercise one or multiple rights, we shall give you written or electronic notice.

Exercising one of these rights towards us, does not imply exercising this right towards our commercial partners and vice versa. If you want to exercise one of these rights towards us as well as our commercial partners, you have to send the request/supplementary statement to both parties.

### ***Security***

We have implemented appropriate technical and organisational measures in order to avoid the erasure, loss, falsification, modification, unauthorised access or accidental disclosure to third parties of your personal data as well as the unauthorised processing of your personal data.

We cannot be held accountable for any direct or indirect damage resulting from the incorrect or unlawful use of your personal data by third parties.

### ***Third party websites***

We are not responsible for the content of third party websites to which our website refers or the products or services mentioned on these websites. Only this privacy statement applies for the use of our website. Taking into account that the privacy statement of other websites may differ, it is recommended to read the privacy statement of all websites you visit.

### ***Complaints***

If you consider that the processing of personal data relating to you infringes the provisions of this privacy statement or the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

### ***Amendments to this privacy statement***

It is possible that this privacy statements will be extended or amended in the future, e.g. in the event of new developments. For this reason we encourage you to consult this privacy statement regularly.

### ***Contact***

If you have questions relating to this privacy statement, you can always contact us (ABCommunication, Aststraat 245, 3300 Tienen, [office@abcommunication.be](mailto:office@abcommunication.be), [www.abcommunication.be](http://www.abcommunication.be))