

Privacy Notice

This privacy notice explains what information we gather about individuals, what we use that information for and who we give that information to. It also sets out the applicable rights in relation to personal information and how to contact us in relation to privacy matters.

Who this privacy statement applies to and what it covers?

This privacy statement applies to each of the entities belonging to the group of companies operating under the Finvision brand (“Finvision”). Each Finvision entity is a separate and independent legal entity and this privacy statement applies to each separately.

We are committed to protecting your privacy and handling your information in an open and transparent manner.

This privacy statement sets out how we will collect, handle, store and protect information about you when:

- providing services to our clients
- usage of Finvision.be or other websites provide by Finvision
- any other activities performed by Finvision that includes the processing of personal information.

What information we collect?

In the course of providing services to you or our clients and performing due diligence checks in connection with our services (or discussing possible services we might provide), we will collect or obtain personal data about you. We may also collect personal data from you when you use our Website in the form of cookies.

We may collect or obtain such data because you give it to us (for example in a form on our Website), because other people give that data to us (for example your employer or adviser, or third party service providers that we use to help operate our business) or because it is publicly available.

We may also collect or obtain personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, we (or our service providers) may use cookies (small text files stored in a user’s browser).

The personal data that we collect or obtain may include: your name; age; date of birth; gender; e-mail address; telephone number; home address; country of residence; family circumstances; employment and education details; financial and tax-related information; your postings on any public websites or social media applications and services that we provide; your IP address; your browser type and language; your access times; complaint details; details of how you use our products and services; details of how you like to interact with us and other similar information.

The personal data we collect may also include so called ‘sensitive’ or ‘special categories’ of personal data, such as social security number (“Rijksregister number”) details about your sexual orientation (for example if you provide us with details of your spouse or partner).

The types of personal data and special categories of personal data that we collect may vary depending on the nature of the services that we provide to you or our client, or how you use our Website. In some rare circumstances, we might also gather other special categories of personal data about you because you volunteer that data to us or we are required to gather that data as a result of legal requirements imposed on us.

When we are provided with personal data, we use reasonable efforts to include clauses into the contract with the client that will require them to comply with the privacy laws and regulations relevant to that information; this may include, for example, that the client has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy statement.

How we use information about you?

We will use your personal data to provide you or our client with the requested services. As part of this, we may also use your personal data in the course of correspondence relating to the services. Because we provide a wide range of services to our clients, the way we use personal data in relation to our services also varies. For example, we might use personal data:

- about a client's employees to help those employees manage their tax affairs when working overseas
- about a client's employees and customers in the course of conducting an audit (or similar activity) for a client
- about a client's directors in order to comply with anti-money laundering regulations
- about a client to help him/her complete a tax return
- about a client's employees to contact him during the performance of our services and keep them informed of the project's progress or in order to communicate them our projects' deliverables.
- applicable legal or regulatory requirements (including requests from competent authorities
- administrative purposes
- financial accounting, invoicing and risk analysis purposes
- client relationship purposes
- recruitment and business development purposes
- protecting our rights and those of our clients
- we may also use your personal data collected via our Website to manage and improve our Website

In all above cases and any other cases we use your personal data, we give you the opportunity to decline our offers and requests at any time by contacting us at the details provided below. In specific cases if needed, for example in case you are not yet a client, we will make sure to obtain your prior consent before sending you communications' materials or other marketing requests (see also the next section).

The legal grounds we use for processing personal information

We use your personal data for the purposes outlined above because :

(a) of the legal and regulatory obligations that we are subject to, such as keeping records for regulatory or tax purposes or providing information to a public body or law enforcement agency

(b) the information is required in order to provide our services to you or our client (performance of a contract)

(c) of our legitimate interests in the effective delivery of our services to you or our client our legitimate interests in the effective and lawful operation of our business so long as such interests are not outweighed by your interests;

To the extent that we process any sensitive personal data relating to you for any of the purposes outlined above, we will do so because either:

- (i) you have given us your explicit consent to process that data;
- (ii) we are required by law to process that data in order to ensure we meet our 'know your client' and 'anti-money laundering' obligations (or other legal obligations imposed on us);
- (iii) the processing is necessary for the establishment, exercise or defence of legal claims or
- (iv) you have made the data public.

Who we disclose your information to?

In connection with one or more of the purposes outlined in the "How we use information about you?" section above, we may disclose details about you to: other entities with Finvision; third parties that provide services to us; competent authorities; your employer and/or their advisers; your advisers; organizations that help us reduce the incidence of fraud and other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the "How we use information about you?" section above.

We may also need to disclose your personal data if required to do so by law, a regulator or during legal proceedings.

Protection of your personal information

We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date in accordance with our Information Security Policy.

How long we keep your information for?

We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the services provided.

Your rights

You have various rights in relation to your personal data. In particular, you have a right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data

- withdraw consent to our processing of your personal data (to the extent such processing is based on consent)]
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract)
- object to our processing of your personal data.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please email privacy@finvision.be or write to us at the address below:

Finvision Corporate Services

Kuringersteenweg 172

3500 Hasselt, Belgium

You may also use these contact details if you wish to make a complaint to us relating to your privacy. We prefer contact by e-mail.

Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

To let you know when we make changes to this privacy statement, we will amend the revision date at the top of this page. The new modified or amended privacy statement will apply from that revision date. Therefore, we encourage you to periodically review this statement to be informed about how we are protecting your information.