

Privacy Policy

Date of creation: 4/1/2024

Date of last modification: 4/1/2024

1. Who is responsible for processing your data?

This information notice (hereinafter the “**Privacy Policy**”) describes how the Association of Communication Companies (hereinafter referred to as “**ACC**” or “**We**”) collects, uses, and shares the personal data of individuals with whom it interacts (hereinafter “**You**” or the “**Data Subject**”) through its website <https://commcareers.be/> (hereinafter the “**Website**”).

We process this personal data in accordance with applicable data protection laws, particularly Regulation 2016/679 of April 27, 2016, regarding the protection of individuals concerning the processing of personal data and the free movement of such data, applicable since May 25, 2018, and the Belgian Law of July 30, 2018, regarding the protection of individuals concerning the processing of personal data (hereinafter the “**Data Protection Legislation**”).

ACC is the Data Controller within the meaning of the Data Protection Legislation:

ASSOCIATION OF COMMUNICATION COMPANIES ASBL/VZW

Minervastraat 4

1930 Zaventem

Belgium

info@accbelgium.be

VAT BE0451546876

Access to the Website implies your complete and unconditional understanding of this Privacy Policy as well as the Website’s Cookie Policy (hereinafter the “**Cookie Policy**”).

You acknowledge having read the information covered by the Privacy Policy and understand that We will process, in accordance with the Data protection legislation and the Privacy Policy, your personal data for the purposes determined below.

This Privacy Policy does not apply to pages hosted by third parties to which We may refer, and their privacy policies may differ. Therefore, We cannot be held responsible for the data processed by and on these websites. We invite You to consult the respective privacy policies of these third parties.

2. What data do we collect?

As part of the activities mentioned below, You authorize ACC to record and store the following data for the purposes mentioned in point 3:

Activity	Data collected
Contact pages and other communication	<ul style="list-style-type: none"> - Identification details you provide in the context of the communication (e.g. name); - Contact details you provide in the context of your communication (address, email, phone number, etc.); - The communication itself (message/ question/ request and any information therein); - Metadata (e.g. date and time).
Subscribing to our newsletter	<ul style="list-style-type: none"> - Information You provide when You subscribe to the newsletter, such as your email address.
Direct marketing	<ul style="list-style-type: none"> - We may use your identification data, contact details and purchase history and habits for direct marketing purposes (i) if You are (or your company is) a customer of us and/or if You have shown a specific interest in our products or services or (ii) if You have provided your consent thereto ("opt-in").
Cookies	<ul style="list-style-type: none"> - IP-address; - Cookies; - Connection moments and duration of your visit; - Activities (web pages you visit, clicks); - Browser and/or device.
Evidence and risk management	<ul style="list-style-type: none"> - In the event of an actual dispute or claim (including collection of debts), We may collect, use and preserve any data that was previously collected in the context of a different processing activity, to the extent it is considered useful to manage the concerned dispute and/or to anticipate on further escalation.
Client management	<ul style="list-style-type: none"> - Identification data; - Contact details; - Profession and organization; - Contractual terms; - Financial information (information about payments); - Purchase history and habits; - Information on the course of cooperation (deliveries, results of the services, evaluations, complaints, commercial gestures, etc.).
Supplier management	<ul style="list-style-type: none"> - Identification data; - Contact details; - Profession and organization; - Date of birth; - Information on the supplier's (or its personnel's) CV; - Work permits; - Contractual terms; - Emergency contacts; - Financial information (information about payments); - Information on the course of cooperation (deliveries, results of the services, evaluations, complaints, commercial gestures, etc.)

(hereinafter collectively referred to as the "**Data**")

3. Why do we collect Your Data?

We process Your Data for various purposes. For each processing, only Data relevant to the purpose in question is processed.

We therefore collect and process Your Data for the following purposes:

- to reply to and follow-up on your question, complaint or other communication;
- to inform You by means of our newsletters;
- to analyse, adapt and improve the content of the Website;
- to provide the Service;
- to allow You to receive messages;
- to facilitate the availability and use of the Website;
- to personalize Your experience on the Website;
- to respond to requests for information;
- for any marketing activities and promotions proposed by ACC to You who have given their consent;
- to inform them about any changes on the Website and its features;
- for any other purpose to which You have expressly consented;
- for evidentiary purposes, in the context of claims management.

4. How do we justify the collection of Your Data?

The legal bases for processing are as follows:

- **Our legitimate interest:** in particular to ensure the proper functioning of Our website, to respond to your requests.
- **Your consent:** in particular in relation to cookies on Our website and when you subscribe to an ACC promotional service (for example by subscribing to Our Newsletters).
- **Performance of a contract:** in particular in relation to the invoicing of membership fees.
- **Legal obligation:** to comply with all applicable laws, in particular in tax matters.

5. How long to we process your personal data?

We keep your Data for as long as necessary to achieve the purposes for which it is collected (see point 3). The retention periods may vary from one processing operation to another, depending on the purpose and the legal basis for the retention periods.

Activity	Retention period
Contact pages and other communication	Communication is stored in active databases for a period of 2 years, thereafter, data is archived for an additional period of up to ten (10) years.
Subscribing to our newsletter	Up to 2 years from the last active contact. After that, we will ask you to confirm if you still want to receive our communications to renew your consent.
Direct marketing	Up to 2 years from the last active contact.

Cookies	The storage period of personal data collected through cookies depends on the cookie concerned. Please refer to our Cookie Policy for more information.
Evidence and risk management	Data is generally preserved up until the relevant statutory prescription term of the concerned action, agreement or activity (usually 10 years).
Client management	Until 10 years from termination of the (contractual) relationship. Data may be further processed in the context of " <i>Evidence and risk management</i> ".
Supplier management	Until 10 years from termination of the (contractual) relationship. Data may be further processed in the context of " <i>Evidence and risk management</i> ".
Legal obligations	In accordance with the term of the legal obligation.

6. Is Your Data shared with third parties?

We treat personal data as confidential information. We will not communicate them to third parties under any condition other than those specified in the Privacy Policy, such as to achieve the objectives set out and defined in point 3, or under the conditions in which the law requires it to do so.

We may disclose Your Data to affiliated companies and third parties to the extent that such sharing is legal, legitimate, necessary, specific, and for clear purposes. For example, this may occur when it is strictly necessary for the performance of a contract with You, if You have given your consent, or if it serves our legitimate interests, provided that these interests do not override your interests and fundamental rights.

The disclosure of Your Data to the aforementioned parties will, in all circumstances, be subject to strict contractual obligations and confidentiality.

7. Security of Your Data

We do everything in our power to protect Your Data in the best possible way. We have therefore taken the appropriate organizational and technical measures to ensure a level of security adapted to the risk and that, to the extent possible, the servers hosting the personal data processed prevent:

- unauthorized access to or modification of this data;
- improper use or disclosure of such data;
- unlawful destruction or accidental loss of such data.

In this respect, employees of ACC who have access to Your Data are subject to a strict confidentiality obligation.

8. What are your rights ?

8.1. According to the regulations on the processing of personal data, You have the following rights:

- **The right of access:** This means that You can, at any time, request access to the Data we hold about You. We ask You to submit such a request by mail so that we can identify you with certainty (please provide your first name, last name, address, and a valid proof of your identity).
- **The right to rectification:** This means that You can ask ACC to ensure that the Data we have about You is kept up-to-date. If the Data is inaccurate or incomplete, You can ask ACC to correct it.
- **The right to erasure of your personal data:** This means that You can ask ACC to erase the Data we have about You. Please note that there may be circumstances in which we are obligated to retain Your Data to comply with our legal and regulatory obligations.
- **The right to object to the processing of your personal data:** This means that You can, at any time, object to the use of Your Data by ACC or our active partners by sending such a request.
- **The right to restriction of processing:** This means that You can obtain the restriction of the processing of your personal data after objecting, if You contest the accuracy of the personal data or if you consider the processing to be unlawful.
- **The right to data portability:** This means that You have the right to receive Your Data in a structured, commonly used, and machine-readable format. You also have the right to transfer this data to another organization.

8.2. To exercise your rights, You submit a written request along with a copy of your identity card or passport to the following email address: stephanie@acc.be

In addition, You can also lodge a complaint to the Belgian Data Protection Authority directly:

Data Protection Authority

35 Rue de la Presse
1000 Brussels
Belgium
contact@apd-gba.be

8.3. We are committed to promptly addressing your requests, ensuring satisfaction within one month of receiving the application. In cases of complexity or a high volume of requests, an extension of up to two months may be necessary to ensure thorough and comprehensive processing.

9. Do we process personal data concerning children?

Our Website, and services are intended solely for adults and should not be used by children under the age of 13 without parental consent.

A child under the age of 13 should not create their own user account.

If we discover that personal data of a child has been collected without explicit and verifiable consent from the parents, we will delete the relevant personal data as soon as reasonably possible.

10. Are your Data transferred outside the European Union?

We only transfer personal data to a non-EU country if that country provides an adequate level of protection in accordance with data protection legislation and within the limits permitted by such legislation. For example, this may include ensuring the protection of personal data through the implementation of Standard Contractual Clauses (SCC) adopted by the European Commission.

11. Updates and changes to Our Privacy Policy

We may change this Privacy Policy from time to time, including in the event of legislative changes. We encourage you to review this policy regularly.

In addition, We will inform you of any changes in content via Our website and other frequent communication channels.

12. Validity of the contractual clauses

Failure by ACC to invoke - at any given time - a provision of this Privacy Policy, may not be interpreted as a waiver to subsequently make use of its rights under the said provision.

The invalidity, expiration, or unenforceable nature of all or part of one of the above or below-mentioned provisions shall not give rise to the invalidity of all the Privacy Policy. Any fully or partially invalid, lapsed or unenforceable provision shall be deemed not to have been written. ACC undertakes to substitute this provision with another which, to the extent possible, fulfills the same objective.

13. Applicable law and competent court

The validity, interpretation and/or implementation of the Privacy Policy are subject to Belgian law, to the extent permitted by the provisions of applicable private international law.

In the event of a dispute relating to the validity, interpretation or implementation of the Privacy Policy, the courts and tribunals of Brussels have exclusive jurisdiction, to the extent permitted by the provisions of applicable private international law.

Before taking any step towards the judicial resolution of a dispute, You and ACC undertake to attempt to resolve it amicably. To this end, they shall first contact each other before resorting, where appropriate, to mediation, arbitration, or any other alternative method of dispute resolution.

14. Contact us

If you would like further information or if you have any questions or complaints regarding the processing of your personal data, you can contact us in writing at:

Association of Communication Companies
Minervastraat 4
1930 Zaventem
Belgium

Or by sending us an email to stephanie@acc.be
