

## **Personal data-protection policy**

**HIVELAB Software & IT services**

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## 1 Purpose

**HIVELAB** considers the appropriate protection of the data it processes, including personal data, to be very important. Through this policy, **HIVELAB** aims to define the way in which data is used at a strategic level, with respect to security and confidentiality.

In particular, **HIVELAB** wants to protect the data of its clients, as well as personal data they have entered into the HIVEINVOICE software or communicated when placing an order (website, bespoke software, etc.).

This policy aims to adopt the various fundamental principles of the **GENERAL DATA PROTECTION REGULATION** (hereafter, the GDPR), which has been applicable since 25 May 2018, in a completely transparent manner and to provide each relevant party with the necessary information, namely what data is collected and processed, for what categories of individuals and for what purposes, the legal bases for the processing, how long the data will be stored and the technical and organisational measures that are applied to ensure optimal security of this data.

Through this policy, **HIVELAB** aims to encourage everyone involved in electronic and paper processing to ensure the correct processing of the personal data entrusted to them, as part of a common outlook and based on our desire to offer high-quality services.

This policy manual serves as the standard for the processing performed by **HIVELAB** on personal data. It serves as a common thread for all processing activities and a benchmark for auditing and oversight activities. The policy manual allows each stakeholder, collaborator or external individual to consult the data protection policy.

The manual was also written for any individual assuming a role within **HIVELAB** that requires them to process personal data. They can use this policy manual to develop procedures and guidelines for internal and external collaborators. The relevant portions of this policy manual are included in contracts that are concluded with staff, subcontractors, suppliers and other third parties.

By using the website, ordering online or using other products and services (mobile) from **HIVELAB**, the individual agrees to the application of this protection policy.

**HIVELAB** reserves the right to amend this policy. The applicable version may be consulted on the **HIVELAB** website at any time.

## 2 Data controller

### 2.1 Identity and contact details

#### **HIVELAB Software & IT services**

Registered office: Rue de Lantin 155 A, 4000 Liège

Registered with the Banque-Carrefour des Entreprises under company number BE0450.218.867 and represented by its manager, Mr Didier Zovi

In general, **HIVELAB** processes personal data:

- from its staff
- from its clients/prospective clients
- from its subcontractors, suppliers or other third parties
- from third parties who are entered into the HIVEINVOICE software by its clients, or whose contact details are conveyed while placing an order

hereafter referred to as 'the data subject'.

This data is processed in accordance with the Belgian Law concerning the protection of personal data and, after its entry into effect, the General Data Protection Regulation 2016/679 (GDPR).

The client requests the right to use the HIVEINVOICE software from **HIVELAB**, with a view to entering data concerning its clients and managing invoices pertaining to them. As a result, **HIVELAB** becomes responsible for processing the personal data entered in the HIVEINVOICE software.

The client may also be required to provide the contact details of third parties when placing an order (website, bespoke software, etc.).

In this context, **HIVELAB** ensures the implementation of all of the appropriate technical and organisational measures, so that processing complies with the requirements of the GDPR.

### 2.2 Contact

For any questions pertaining to personal data and, in particular, to exercise the rights outlined in the GDPR, the individual may contact:

#### **HIVELAB Software & IT services**

Steering committee

Rue de Lantin 155 A

4000 Liège

[privacy@hivelab.be](mailto:privacy@hivelab.be)

Phone: 04/221.78.85

### 3 Sources of data

How do we collect personal data?

- The relevant party (a client or prospective client) sends it to us directly, with a view to obtaining information about our services or concluding a collaboration agreement, potentially during trade fairs, events, networking events, commercial meetings, on the website, etc.
- In terms of third-party data, our clients convey this to us in order to perform our duty, whether this is using the HIVEINVOICE software or finalising a specific order.
- Applicants communicate it to us as part of a recruitment process and with a view to concluding a potential contract (freelance or employee) and employees communicate it to us as part of human-resources management and payroll administration.
- Suppliers provide us with data when concluding contracts for the provision of goods or services. Their data is only processed to execute the contract between the parties.

### 4 Categories of data collected and processed

**HIVELAB** collects and processes the following categories of personal data as needed:

- data concerning identification, residence and correspondence: surname, first name, date of birth, address, national registration number, company number, landline and/or mobile phone number, email address.
- economic and financial data: income, bank account number, bankruptcy proceedings, etc.
- third-party data conveyed by the client
- professional data
- image recordings
- location data
- psychological and biometric data, for staff only

**HIVELAB** does not collect any data concerning racial or ethnic backgrounds, genetic details, political opinions, religious or philosophical beliefs, membership of trade unions, or details concerning the sexual orientation of individuals.

**HIVELAB** exclusively processes personal data that is strictly necessary for performing its activities. This way, the identifying details contained within the personal data are minimised.

**HIVELAB** verifies the integrity and accuracy of personal data throughout the life cycle of the processing.

### 5 Purposes/Processing/Legal bases

#### 5.1 Managing clients

**HIVELAB** collects and processes data from its future clients, with their consent, in order to conclude and execute a contract, as well as issuing, monitoring and collecting their invoices, regardless of whether this involves third parties or not. This data is then processed based on the contract. The data shall then be retained until the legal tax and accountancy obligations for retention have expired.



This personal data is intended to be used solely for internal purposes. It shall only be communicated to third parties if the relevant party has given their consent; this consent may be withdrawn at any time.

As part of our duty, namely the provision of IT services or the HIVEINVOICE software program, data is processed for financial administration purposes, and for the purpose of providing information about our duty or our services.

This data may also be processed with a view to managing client information, using a contractually obligated CRM subcontractor, or to performing the necessary or desired tasks that are expected as part of the business relationship.

Furthermore, this data may also be shared with partners, suppliers or other employees, in cases where processing by these third parties is necessary for performing the duty commissioned from **HIVELAB**. The necessary agreements have already been concluded with these partners, suppliers or other employees, in order to limit the usage and processing of this data and ensure that it is sufficiently protected.

Withdrawing consent does not compromise the legality of the processing based thereon and performed before the withdrawal, which the relevant party has been duly informed about.

Processing does not imply any decision based solely on automated processing, including profiling.

Processing does not imply any transfer of data to a country that is not a member of the European Union or the European Economic Area.

## **5.2 Promoting products and services to clients**

**HIVELAB** also processes the personal data of its clients or prospective clients, with their consent, in order to later send them information about other available services or products and to promote its services, including by post, email, phone or advertising platforms (such as Google, Facebook, Twitter, LinkedIn, etc.).

The data shall then be retained until the legal tax and accountancy obligations for retention have expired.

This data is only communicated to third parties if the relevant party has given their consent; this consent may be withdrawn at any time.

A link to unsubscribe appears in each electronic communication addressed to the relevant party, so they are able to withdraw their consent at any time. Withdrawing consent does not compromise the legality of the processing based on this consent and performed before the withdrawal, which the relevant party has been informed about before giving their consent.

Processing does not imply any decision based solely on automated processing including profiling.

Processing does not imply any transfer of data to a country that is not a member of the European Union or the European Economic Area.

## **5.3 Commercial prospecting**

Based on the principle of legitimate interest, and in order to satisfy its goals of managing and sustaining its activities over time, **HIVELAB** shall use the data collected from trade fairs, exhibitions, networking events and word of mouth to contact individuals and companies for commercial purposes (by email, phone, post or any other means), regardless of whether they have expressed an interest in our activities/products or not.

The relevant party may indicate that they do not wish to be contacted any more at any time or give their consent to be prospected at a later date.

Processing does not imply any decision based solely on automated processing including profiling.

Processing does not imply any transfer of data to a country that is not a member of the European Union or the European Economic Area.

liquidators, debt mediators, notaries, court bailiffs, deputy judges, heirs, prisons, etc.

The personal data of 'third-party processors' is collected for the sole purpose of performing the recovery duty for the relevant debtor, on the basis of legitimate interest. This may be transferred to our client in the event that they wish to end our duty and continue the recovery themselves directly with the third-party processor.

Processing does not imply any decision based solely on automated processing including profiling.

Processing does not imply any transfer of data to a country that is not a member of the European Union or the European Economic Area.

#### **5.4 HR processing (recruitment, human resource management and payroll administration)**

When recruiting, **HIVELAB** collects personal data from applicants with their consent.

CVs, cover letters and test results, as well as notes taken during the recruitment interview, are then processed for the purposes of monitoring the recruitment process.

The necessary data shall then be collected and processed for the purpose of concluding a contract and, subsequently, for managing human resources and payroll administration.

**HIVELAB** does not process health data, except within the framework of legislation concerning well-being at work and when reporting and managing workplace accidents.

Biometric data about employees is used exclusively for the purposes of operating the time clock to manage day-to-day performance.

**HIVELAB** is legally obliged to transfer certain data to third parties, including public authorities, the administrative body and the occupational physician.

**HIVELAB** transfers appropriate and relevant data to other partners and suppliers, so that its staff may benefit from various advantages, though always with consent (meal and/or environmental vouchers, hospital insurance, leasing companies, etc.).

These partners process personal data for a specific purpose on behalf of **HIVELAB**. The required agreements are always concluded with these partners or suppliers, in order to define the framework for the processing, and we do everything possible to ensure that they guarantee the security of your personal data.

In rare cases, **HIVELAB** may be obliged to disclose personal data because of a court order, or in order to satisfy binding legislation or regulations.

Processing does not imply any decision based solely on automated processing including profiling.

Processing does not imply any transfer of data to a country that is not a member of the European Union or the European Economic Area.

## **6 Rights of the relevant party**

In accordance with data-protection regulations, you may exercise the following rights:

- the right to request information about the processing of your data
- the right to access and consult your data
- the right to portability (obtain a copy in a standard and structured format that is commonly used and can be read by a machine, in order to facilitate its transmission to another data controller)
- the right to request rectification (for example, if you believe the data is inaccurate or out of date)
- the right to withdraw consent (assuming the processing is based on prior consent)



- the right to be forgotten, as long as this does not breach legal retention/limitation periods
- the right to oppose the use of data for profiling or automated decision-making purposes
- the right to restrict processing

**HIVELAB** stays apprised of any restrictions that apply to these rights.

#### How to contact us and exercise these rights?

You may contact us about exercising these rights, or any questions concerning the protection of personal data, via [privacy@hivelab.be](mailto:privacy@hivelab.be) or the contact details outlined in Point 2.2.

You may also get more information from the new Data Protection Authority (formerly known as the Commission for Protection of Privacy) via the following website:

<https://www.autoriteprotectiondonnees.be/>

## 7 Duration of data retention

**HIVELAB** retains data for the period necessary to perform its duty or, after the client has closed their HIVEINVOICE account, in accordance with legislation and legal tax and accountancy obligations concerning its retention.

All other data is retained for the aforementioned period concerning tax and accountancy.

A legitimate interest also exists when **HIVELAB** must retain data in order to file, exercise or support potential legal action.

## 8 Organisational and technical security measures to protect the confidentiality of data

**HIVELAB** applies security measures that are appropriate from a technical and organisational point of view, in order to avoid the destruction, loss, falsification or modification of the personal data collected, as well as access by unauthorised individuals, accidental communication to third parties and any other unauthorised processing of this data.

These measure concern, among other things:

- authentication
- managing clearance
- tracing access and managing incidents
- securing workstations, mobile computing, servers and the website
- protecting the IT network
- safeguarding and forecasting the continuity of activities
- archiving
- supervising maintenance
- managing subcontractors
- securing exchanges with other organisations
- protecting premises
- personal safety



All of these measures are outlined in the document entitled 'Measures to secure personal data'.

**HIVELAB** insists on the confidentiality of passwords.

## 9 Duties and obligations of the data controller

**HIVELAB** undertakes to protect data from its conception and by default, by taking the appropriate technical and organisational measures, ensuring that only personal data that is necessary for each specific purpose is processed and implementing the appropriate guarantees with processing activities in order to satisfy the requirements of the GDPR.

**HIVELAB** ensures that only individuals who are contractually bound and acting under its authority process data as part of their duties.

**HIVELAB** only employs subcontractors who demonstrate sufficient guarantees regarding the implementation of appropriate technical and organisational measures, which satisfy the requirements of the GDPR and ensure the protection of the relevant party's rights. Processing by a subcontractor is governed by a contract.

If processing must be altered (for example, using a new technology or automated processing), **HIVELAB** shall perform an impact assessment to evaluate the risk to the rights and freedoms of the relevant party.

**HIVELAB** keeps an internal record of the processing activities, in accordance with Article 30 of the GDPR.

**HIVELAB** commits to cooperating with the supervisory authority, in particular by notifying them of leaks or breaches of personal data.

**HIVELAB** is not obligated to nominate a Data Protection Officer (DPO).

In order to comply with its responsibilities, **HIVELAB** has established a steering committee, which shall be responsible for monitoring and oversight through internal compliance checks with the goals of this personal data protection policy.