

IT-Training4All BV

Policy for the Protection of Personal Data

Article 1: General

IT-Training4All BV (Limited Liability Company under Belgian law), having its registered address at Van Eyckstraat 32, 1800 Vilvoorde and registered with the CBE under number **0875.078.966**, registered in the Register of Legal Entities in Brussels – division Brussels-Halle-Vilvoorde (referred to hereinafter as "**IT-Training4All**") considers privacy protection as extremely important. **IT-Training4All** wants to inform, respect and give its customers and the users of its services as much control as possible about what happens to their data. The company is fully compliant with the appropriate forms and procedures under the European General Data Protection Regulation.

IT-Training4All wants to manage and use its customer data safely, respectfully and with due care to better serve its customers and provide them with the best possible experience.

IT-Training4All's basic principle is therefore that everyone must be able to control their personal data. Below you will find information about which data **IT-Training4All** collects, why and how long, and how you control this.

IT-Training4All invites its customers to take time to go through this Policy for the Protection of Personal Data (available on the website), together with the General Terms and Conditions (also available on the website) and any other conditions that may apply to its products and services.

Article 2: Application

This Policy for the Protection of Personal Data applies to all our customers (current, former and future) and all visitors to the **IT-Training4All** website(s).

The European General Data Protection Regulation 2016/679 of 27 April 2016 ("General Data Protection Regulation"), the Act of 30 July 2018 (Belgian transposition of the EU GDPR Directive), the Act of 13 June 2005 ("Act on Electronic Communication") and the accompanying implementing decrees, as well as any future amendments thereto, regulate your personal data protection.

IT-Training4All aims to fulfil its obligations and respect a customer's rights every time **IT-Training4All** Processes his or her personal data.

For more information on this, **IT-Training4All** please go to the Data Protection Authority website (<https://www.dataprotectionauthority.be/citizen>).

Article 3: Personal data processing and responsibilities

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"), on the understanding that an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The personal data that **IT-Training4All** collects and processes data primarily relate to the data that the customer has personally entered by way of the various pages of our website(s) and that **IT-Training4All** obtains through your use of our website(s) and/or of our products and/or services.

IT-Training4All acts as data controller of its customers' personal data for the purposes described in this Policy for the Protection of Personal Data.

This does not detract from the fact that the customer has a number of obligations relating to personal data processing, which allows the customer to use **IT-Training4All's** products and services.

In this capacity, the customer must always obtain the legally required end users' consent to have their personal data processed by **IT-Training4All** to the extent necessary within the framework of the of **IT-Training4All** products and services.

Article 4: Purposes

IT-Training4All processes personal data for various purposes, in each case processing only those data that are necessary to achieve the intended purpose.

We use personal data in the following cases:

- where we have obtained consent;
- within the context of preparing or executing our contract;
- to comply with the legal or regulatory provisions to which we are subjected;
- where **IT-Training4All** has a legitimate interest in doing so such as doing direct marketing, preventing fraud, managing internal administration or monitoring appropriate network and information security, in which case we always endeavour to maintain a balance between that interest and respecting the data subject's privacy.

Provided that it has been given consent and as far as it is necessary, **IT-Training4All** collects personal data for the following specific purposes:

to process requests for our products and services

If you visit our website to collect and/or request information about our products and services or if you register for the **IT-Training4All** newsletter,

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for example, then *IT-Training4All* needs your (electronic) address details in any event.

IT-Training4All uses any information that it receives from you in this pre-contractual phase solely and only to provide you with the requested information in the manner you want.

When you finally decide to become a *IT-Training4All* customer, *IT-Training4All* will also request some personal data such as your name, address, telephone number, email, postal and invoice addresses, and it will also assign certain data to you, such as login details, activation licenses and a customer number;

to provide the best service and information about the possibilities regarding use

IT-Training4All uses personal data to set up, maintain and support products and services and for administrative purposes.

to provide information about (new) IT-Training4All products and services

IT-Training4All may use personal data to offer new products, services or special actions (in writing, by telephone or electronically) which *IT-Training4All* believes may be of interest to you. You can opt out of these types of messages: see below.

to monitor performance

IT-Training4All may use personal data and consumer profiles to evaluate its products and services. This includes matters such as: requesting feedback on services (e.g. via market research), information that we obtain from answers to customers' questions, detecting fraud and providing quality assurance.

to comply with legal obligations

If necessary, *IT-Training4All* is legally required to retain and/or disclose certain personal data to public authorities for the purposes of general tax and accounting obligations, for example. *IT-Training4All* may be required to confidentially communicate certain data to the necessary authorities within the context of a police or judicial investigation.

to keep a record of studies, tests and statistics for trend analysis purposes, for example

IT-Training4All can use anonymous, aggregated data to report internally and externally on the use of its services, for example. The data used in this regard cannot be traced back to a particular individual.

The information that *IT-Training4All* takes from such analyses is used to identify the current *IT-Training4All* product and service portfolio and processes and to adapt it to new developments.

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Article 5: Security

IT-Training4All endeavours at all times to protect personal data and privacy, both in the physical offices and on the *IT-Training4All* network. *IT-Training4All* ensures that there are appropriate organisational and technical measures to secure personal data.

IT-Training4All employees are trained to confidential data correctly. Personal data security and protection in privacy-sensitive projects are also assessed.

With regard to data security, *IT-Training4All* uses all kinds of technical measures to protect personal data, such as: security by means of a password, hard disk encryption software and access control systems for employees.

Should a data breach having adverse effects on personal data occur, the customer will be personally notified in the circumstances provided for by law as soon as possible after such data breach has been identified.

The number of *IT-Training4All* employees having access to personal information is limited and carefully selected. Such employees are granted access to personal information to the extent that they need it to perform their duties adequately.

The existence and content of the personal communication conducted via the *IT-Training4All* network (for example: through email, hosting, etc.) is protected by the provisions regarding the confidentiality of telecommunications. This means that, except in the cases listed by law, *IT-Training4All* and its employees may not take note of the existence or content of such communication.

The websites of *IT-Training4All* sometimes include links to websites belonging to third parties (social media and event organisers) whose terms and conditions of use do not fall within the scope of this Policy for the Protection of Personal Data. Please carefully read their personal data protection policy.

Article 6: Providing information to third parties

IT-Training4All does not sell personal data to third parties, nor is such transmitted to third parties except:

to our legal successors and any affiliated companies:

IT-Training4All transmits personal data to any legal successors and affiliated companies (such as subsidiaries and affiliates) for the same purposes as those mentioned in this Policy for the Protection of Personal Data.

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This is necessary for our service provision:

We work with third parties or engage subcontractors for some aspects of our products and services. Such third parties are always carefully selected and there is always an agreement between **IT-Training4All** and such third party in accordance with the applicable legislation. For example, **IT-Training4All** uses service providers providing services such as cloud-connection, website building, online desktop services and software programs. You can always contact us via the contact details under Article 10 for more information about our subcontractors.

If you purchase an (online) product or service from **IT-Training4All** that was manufactured or supplied by a person located outside the European Union, additional measures such as certification under the EU-US Privacy Shield and/or a processing agreement with model clauses drawn up by the European Commission may be needed to ensure that the personal data are kept secure.

It may be that **IT-Training4All** can no longer provide some services where a person refuses to have his data transmitted.

There is a legal obligation:

IT-Training4All refers to Article 4 of this Policy for the Protection of Personal Data in this regard.

There is a legitimate interest for *IT-Training4All* or the third party concerned:

This is only done on condition that the interests or fundamental rights and freedoms of the data subject are not overriding.

***IT-Training4All* has obtained the data subject's authorisation:**

If **IT-Training4All** provides personal data to third parties in another manner, this will be done by means of an explicit communication regarding the third party, the purposes of the transmission and the processing. Where legally required, **IT-Training4All** will obtain the data subject's explicit and unambiguous consent. The data subject also always has the possibility to object (see below).

As regards the international transmission of personal data, **IT-Training4All** protects all personal data in accordance with the protection level required by European regulations.

In some cases **IT-Training4All** uses anonymous, aggregated data for commercial or external reporting purposes. These data can never be traced back to a particular individual.

Article 7: The data subject's rights

You can exercise a number of rights vis-à-vis **IT-Training4All** regarding the processing of your personal data to the extent that you have such rights under the applicable legislation.

You may exercise such rights by using the contact details stated under Section 10 of this Policy for the Protection of Personal Data. **IT-Training4All** will respond to and comply with such applications in accordance with the applicable legislation and, in principle, within a period of one (1) month, also in accordance with applicable legislation.

You must provide us with proof of your identity to exercise your rights and to prevent any unauthorised disclosure of your personal data. We therefore request that you include a copy of the front of your identity card with your application. The application can be sent to the contact details mentioned under Article 10 of this Policy for the Protection of Personal Data.

If you consider it necessary, you can also address a complaint to or file such with the Data Protection Authority (Belgian Privacy Commission) (commission@privacycommission.be).

Right to object

On the grounds of reasons relating to your specific situation, you have the right to object to the processing of your personal data at all times, which processing is based on the legitimate interest of **IT-Training4All**. If you object, **IT-Training4All** will stop processing such personal data unless **IT-Training4All** puts forward compelling legitimate grounds for processing that override your interests, rights and freedoms, or that relate to the establishment, exercise or defence of a legal claim.

Right to access and transparency

You have the right to access (free of charge) the data concerning yourself and to obtain a copy of such personal data. You can also ask us:

- whether we process your personal data;
- for what purposes we process them;
- which categories of personal data we process;
- with which categories of third parties we share your personal data;
- where the data processed originated;
- what rights you have.

Right to have data rectified and erased

As data subject, you have the right to have incomplete, incorrect, inappropriate or outdated personal data corrected or supplemented.

IT-Training4All can be contacted for this purpose from a registered address or your details can be adjusted via the online Contact Form. In any

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event, we request that you notify us of any change such as a relocation so that we can keep your data up to date.

You also have the right to have your personal data erased without unreasonable delay if and to the extent that:

- the personal data are no longer necessary for the purposes;
- there is no longer any legal basis;
- you object to the processing and there are no overriding legitimate grounds for the processing by ***IT-Training4All***;
- the personal data have been processed unlawfully;
- the personal data must be deleted to comply with a legal obligation to which ***IT-Training4All*** is subjected.

After ***IT-Training4All*** has acceded to the application for erasure and implemented it, it will send you a confirmation message to that effect. In the case of partial erasure, ***IT-Training4All*** will also explain why it could not fully accede to the application.

Depending on the nature of the application, it is possible that ***IT-Training4All*** can no longer provide some services.

IT-Training4All cannot always erase all requested data, for example to fulfil legal obligations (to meet accounting and tax obligations, ***IT-Training4All*** is required to keep invoicing data for a maximum of 7 years, for example).

Right to restrict processing

As data subject, you also have the right to restrict ***IT-Training4All*** in its processing of your personal data, if and to the extent that one of the following elements applies:

1. you contest the accuracy of the personal data, in which case the processing will be restricted for a period that will enable ***IT-Training4All*** to verify their accuracy;
2. the processing is unlawful and you oppose the erasure of the personal data and request that their use be restricted instead;
3. ***IT-Training4All*** no longer needs the personal data for processing purposes, but you need them to establish, exercise or substantiate a legal claim;
4. you have objected to the processing, pending the answer to the question as to whether ***IT-Training4All's*** legitimate grounds override those of the data subject.

If the processing is restricted, the data may in fact still be stored by ***IT-Training4All***.

Right to data portability

As the data subject, you have the right to obtain from ***IT-Training4All*** the personal data that

- (i) are processed within the framework of the execution of the agreement,

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- (ii) which data you provided, and that
- (iii) are processed by automated processes, and to have them available in a structured, commonly used and machine-readable form, as well as to request **IT-Training4All** to transmit such data directly to another party if this is technically possible and if you wish to switch to another provider.

Article 8: Storage periods

IT-Training4All keeps and processes Your personal data for as long as is necessary to achieve the purposes outlined in Article 4.

The storage period may therefore vary for each purpose, for example to fulfil legal obligations (to meet our accounting and tax obligations, for example, **IT-Training4All** is required to keep invoicing data for a maximum of 7 years) or, for the legal need to keep certain data as evidence in disputes, for a maximum of 10 years after your contract has been terminated.

It is self-evident that these archived data are only accessible to a limited extent.

Article 9: Cookies and websites

Apart from the data that you voluntarily submitted to **IT-Training4All** when using our websites, **IT-Training4All** uses cookies and other technological means to collect data.

Websites

IT-Training4All makes any information in the form of text, files and images, as well as in any other form, available for information purposes only.

Any interested person may take note of such information but **IT-Training4All** reserves the right to change the rules and conditions regarding access to the use of the website, or to restrict the entire website or parts thereof, without prior warning, at the time that this seems appropriate.

Access to such private parts of the website can be made to depend on the visitor to /user of the website providing information. The visitor/user who provides this information expressly agrees that such information becomes the property of **IT-Training4All** and that by simply communicating information to **IT-Training4All**, the latter is given explicit permission to use information in accordance with the Policy for the Protection of Personal Data.

IT-Training4All can at all times change the access to the private section of the **IT-Training4All** website that it granted or refused by using usernames

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and passwords, without this leading to any compensation for damages whatsoever.

Cookies

Our website uses cookies or similar technologies in which information is stored on the device and/or read out (all such techniques are referred to here as “cookies” for easy reading purposes). Please see our Policy on the Use of Cookies (available on the website) for more information on which cookies we use, why and how, and which options are open to you.

Article 10: Contact details

A question or request regarding personal data or this Policy for the Protection of Personal Data may be addressed to the following at any time:

IT-Training4All BV

(BTW BE 0875.078.966 RPR Brussels – afdeling Brussels-Halle-Vilvoorde)
Paul Vanhoye (business manager)
Van Eyckstraat 32
1800 Vilvoorde
Belgium

email: Paul.Vanhoye@IT-Training4All.be

Article 11: Amendments

IT-Training4All reserves the right to adjust this Policy for the Protection of Personal Data. Amendments will always be made published on the ***IT-Training4All*** website before the are implemented. It is recommended that you consult this Policy for the Protection of Personal Data regularly so that you are aware of these changes.