

1. Model

This “Privacy Policy” lays down rules for the processing of your personal details by the data controller: Alcom electronics nv/sa, Singel 3, 2550 Kontich, BE0435.244.542 (hereafter: “COMPANY”).

Read this Privacy Policy carefully, as it contains essential information about how your personal details are processed and what cookies are used. By providing your personal details to the Website <https://www.alcom.be> and by providing e-mail addresses set out on this website with Personal Data, you state to have taken note of this Privacy Policy and you also explicitly consent thereto, and you consent to the processing itself.

Article 1 – General

- 1.1. COMPANY complies with the Belgian Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data (“*Wet van 8 december 1992 tot bescherming van de persoonlijke levenssfeer ten opzichte van de verwerking van persoonsgegevens*”), as amended by the Act of 11 December 1998 as well as the anti-spam provisions of Book XII of the Belgian Economic Law Code regarding the “law of the digital economy”.
- 1.2. By means of this Privacy Policy COMPANY is effecting compliance with European Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (GDPR).
- 1.3. COMPANY is the data controller of your personal data. A statement was presented to the Belgian Commission for the Protection of Privacy (*Commissie voor de Bescherming van de Persoonlijke Levenssfeer*) with regard to the processing of your personal data.

Article 2 – Personal Data

- 2.1. Personal data which you present to us:
 - **Category 1**, without registration: your IP address & surfing behaviour on the website;
 - **Category 2**: your profile name, password, e-mail address, login details (and possibly your profile picture);
 - **Category 3**: upon registration: upon registration for our newsletter: your e-mail address (+optional: Firstname, Lastname);

- **Category 4:** via cookies: see Article 9;
- **Category 5:** your address details in connection with placing an order.

2.2. COMPANY can gather data from you (Personal Details) in various ways:

- a. by using cookies (see below);
- b. during your registration and use of the Website;

2.3. The Website also makes use of cookies which gather a number of personal data. See Article 9 for the provisions regarding the use of cookies.

Article 3 – Goals of the processing

3.1. General goals:

COMPANY will only use your Personal Data for the following goals:

- **Category 1:** taking care of and improving this Website and including Personal Data in anonymous statistics, from which the identity of specific persons or companies cannot be determined, with as legal basis the legitimate interests of COMPANY to continually improve its Website and services;
- **Category 2:** the management of your account on this Website with an eye on the use of our COMPANY and website, with as legal basis the performance of an agreement which was requested by you, and, if indicated by you, also the sending of direct marketing, with as legal basis your explicit, prior consent;
- **Category 3:** sending you direct marketing, newsletters, campaigns and promotional activities, with as legal basis your explicit, prior consent;
- **Category 4:** analysis and potential advertising, with as legal basis your explicit, prior consent;
- **Category 5:** the delivery and invoicing of products ordered by you, with as legal basis the provision of a service which you have requested.

You are not obliged to release your Personal Data, but you understand that providing certain services will be impossible if you do not consent to processing.

3.2. Direct marketing:

The personal data can also be used for direct marketing, provided you have given additional explicit consent therefore (“opt-in”).

If you have already been included in our mailing list for receiving marketing material in paper and/or digital form, COMPANY can use your data for sending marketing and other material with regard to COMPANY, its products and/or services. COMPANY can use the data provided by you to update documents saved by COMPANY.

This consent can be withdrawn at any time, without reasoning and for free by, e.g., clicking on the opt-out link which is at the bottom of every marketing e-mail.

3.3. Transfer to third parties:

In the event of whole or partial reorganisation or transfer of activities of COMPANY, whereby it reorganises, transfers or ceases its business activities, or if COMPANY goes bankrupt, this can mean that your data will be transferred to new entities or third parties by means of which the business activities of COMPANY are executed in whole or in part.

COMPANY will reasonably attempt to inform you in advance of the fact that COMPANY is disclosing your data to the aforementioned third parties, but you also acknowledge that this is not technically or commercially feasible under all circumstances.

COMPANY will not sell, lease, distribute or otherwise make your Personal Data commercially available to third parties, except as described above or subject to your prior consent.

3.4. Statutory requirements:

It can occur in rare cases that COMPANY must disclose your Personal Data pursuant to a court order or to comply with other mandatory legislation or regulations. COMPANY will reasonably attempt to inform you in advance in this respect, unless this is subject to statutory restrictions.

Article 4 – Duration of the processing

The personal data will be kept and processed by us for a period which is necessary for the goals of the processing and for the contractual relationship between COMPANY and you. If you have not had interaction with COMPANY for 5 years, we will remove your customer profile.

Article 5 – Your rights

5.1. Right of access and inspection:

You have the right to at any time inspect your personal data for free, as well as the use we make of your personal data.

5.2. Right to rectify, delete and limit:

You are free as to whether or not you inform COMPANY of your personal data. In addition, you always have the right to ask us to rectify, supplement or delete your personal data. You acknowledge that in the event of refusal to provide data or a request to delete personal data, certain services and products cannot be provided.

You may also ask that processing of your Personal Data be limited.

5.3. Right to object:

You also have a right to object to the processing of your personal data for serious and legitimate reasons.

In addition, you always have the right to object to the use of personal data for direct marketing purposes; in such case you do not have to give any reasons.

5.4. Right to freely transfer data:

You have the right to obtain your Personal Data which is processed by us in a structured, common and machine-readable form and/or to transfer it to other controllers.

5.5. Right to withdraw consent:

In so far as the processing is based on your prior consent, you have the right to withdraw that consent.

5.6. Exercising your rights:

You can exercise your rights by contacting us, either by e-mail sent to info@alcom.be, by post sent to Alcom electronics nv/sa Singel 3, 2550 Kontich, or by making use of the "Contact us" section on the Website, provided you enclose a copy of your ID card.

5.7. Automatic decisions and profiling:

The processing of your Personal Data encompasses possible profiling. However, we will not subject you to automated decisions.

5.8. Right to lodge a complaint:

You have the right to lodge a complaint with the Belgian Privacy Commission: Commissie voor de Bescherming van de Persoonlijke Levenssfeer, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: commission@privacycommission.be.

This is without prejudice to measures granted by a civil court.

If you were to suffer loss as a result of the processing of your Personal Data, you can present a claim for damages.

Article 6 – Safety and confidentiality

- 6.1. We have developed safety measures which have been adapted from a technical and organisational perspective, to avoid the destruction, loss, falsification, alteration, non-permitted access or mistakenly passing on personal data to third parties as well as every other non-permitted processing of these data.
- 6.2. In no case can COMPANY be deemed liable for any direct or indirect loss ensuing from an erroneous or wrongful use by a third party of the personal data.
- 6.3. You must at all times comply with the safety regulations, inter alia by preventing every non-permitted access to your login and code. You are thus the person solely responsible for the use that is made from the Website of your computer, IP address and of your identification data, and for the confidentiality thereof.

Article 7 – Access by third parties

- 7.1. In order to be able to process your Personal Data, we allow our employees and possibly other processors with a processor agreement, to access your Personal Data.
- 7.2. We guarantee an equivalent level of protection by making said employees and agents subject to contractual obligations which are equivalent to this Privacy Policy.

Article 8 – Registration with the Privacy Commission

This processing of personal data has been registered with the Belgian Privacy Commission. You can contact this Commission at the following addresses:

Commissie voor de Bescherming van de Persoonlijke Levenssfeer
Drukpersstraat 35
1000 Brussels
+32 (0)2 274 48 00

+32 (0)2 274 48 35
commission@privacycommission.be

Article 9 – Cookies

9.1. What are cookies?

A “cookie” is a small file sent by COMPANY’s server and is placed on the hard disc of your computer. The information stored on these cookies can only be read by us and only during the term of the visit to the Website.

9.2. Why do we use cookies?

Our Website uses cookies and similar technologies to distinguish your user preferences from those of other users of our Website. This helps us to provide you with a better user experience when you visit our Website and allows us to optimise our Website.

As a result of recent statutory changes, all Websites which are geared to specific parts of the European Union are obliged to seek your consent for the use or saving of cookies and similar technologies on your computers or mobile apparatus. This cookie policy gives you clear and full information on the cookies we use and their purpose.

9.3. Kinds of cookies:

Although there are different kinds of cookies, distinguished with regard to functionality, origin or storage term, the legislation primarily draws a distinction between functionally or technically necessary cookies on the one part and all other cookies on the other.

The Website exclusively uses the following cookies:

1. Necessary cookies

These cookies are indispensable for visiting our websites and being able to use specific parts thereof. For example, these cookies allow you to navigate between the various sections of the website or, for example, to fill in forms. If you refuse these cookies, certain parts of the website will not work or will not work optimally.

2. Functional cookies

The functional cookies are the cookies which make the functioning of our websites easier and more pleasant for the visitor and ensure that you have a more personalised surf experience. For example, the cookies which keep track of your preferences.

3. Performance cookies

This Website also makes use of Google Analytics. Cookies gather information on the use that visitors make of our websites with the intention to improve the content of our websites, adapt the content to the wishes of the visitors and to increase the convenience of use of our websites. For example, there is a cookie which helps us count the number of unique visitors and a cookie which keeps track of which pages are the most popular. We also make use of Leadfeeder. Leadfeeder Tracker collects data to their Amazon Web Services infrastructure. All data is encrypted on transfer and at rest. It is used to collect the behavioral data of all website visitors. This includes; pages viewed, visitor source and time spent on the site. The visitor IP address is collected to detect the company and geographic location. Leadfeeder only shows company visits; we automatically filter out all users visiting from residential IP addresses. All visit data is aggregated on the company level. Leadfeeder also enriches that company data with contact data for individuals from publicly available data sources. Their data partners for contact data include Hunter and Full Contact. To increase visitor privacy, IP anonymization is available; this feature will erase the last part of the IP address, thereby making your IP anonymous. Leadfeeder tracker adds a visitor cookie. This cookie is called `_lfa` and has a two year expiry date from when it was first set. The cookie is set for this website domain only, Leadfeeder does not use 3rd party cookies.

4. Third party cookies

The Website also contains elements of other, third parties, such as social media buttons.

For cookies placed by third parties (inter alia Google Analytics) we are happy to refer you to the statements which these parties make on their respective websites. Note: we have no influence whatsoever on the contents of those statements, nor on the contents of the cookies of these third parties: [Google Analytics cookies](#), [Leadfeeder](#)

9.4. Your consent:

Upon your first visit to our Website you will be asked to accept our different kinds of cookies. You can at all times change the cookie settings of our Website via your browser settings.

You can also refuse or block cookies by altering the configuration parameters of your browser. Switching off cookies can mean that you cannot make use of certain functionalities of the Website.

Should you have any further questions or comments with regard to the processing of your Personal Data, please feel free to contact us, either by e-mail sent to info@alcom.be or by post sent to Alcom electronics nv/sa, 2550 Kontich, or by making use of the “Contact us” section on the Website.

More information on cookies is also available on: <http://www.allaboutcookies.org/>