

VENTURIS S.A. PRIVACY POLICY

V3.2 of 07.12.2023

WHY A CONFIDENTIALITY CHARTER?

This Privacy Policy applies to all our claimants, defendants, creditors and debtors or other parties subject to legal proceedings, to anyone who contacts us for our services, and to our subcontractors, suppliers and other external collaborators.

We know that you place your trust in us, which is why we consider it our responsibility to protect your privacy. Our commitment is threefold:

- We collect only the data we need to carry out our mission, and we process them diligently and efficiently in the context of your case;
- We take reasonable precautions to store and process your data securely;
- We protect your personal data by only disclosing it to authorised third parties.

You will find below our principles on confidentiality and respect for your privacy and your data.

WHO ARE WE?

VENTURIS SA has been active in **credit management** and the **amicable and judicial recovery** of unpaid debts since 2004.

As pioneers in the sector in setting up a WEB platform and a computerised engine, we are able to process masses of unpaid debts throughout Belgium, with more than **three million unpaid invoices processed** to date.

VENTURIS has put forward the added value of amicable debt collection, while at the same time providing legal debt collection through its **network of bailiffs and lawyers**. All are interfaced with our IT system, ensuring total transparency.

Our method of remuneration and our procedures ensure that our clients have complete control over the cost of collection.

PROCESSING OF PERSONAL DATA BY VENTURIS

VENTURIS SA is **responsible for processing** personal data that you provide to us directly, for example via online forms or in the context of managing its customers and suppliers. VENTURIS also acts as Data **Controller** when it collects its own debts from debtors.

When VENTURIS acts on behalf of its customers, in particular in the context of debt collection, VENTURIS is then a **Subcontractor** within the meaning of article 4.8 of the RGPD.

We attach the utmost importance to protecting your personal data.

Your personal data is processed in full compliance with current legislation, including the General Data Protection Regulation (GDPR)¹.

WHO IS RESPONSIBLE FOR DATA PROCESSING?

VENTURIS SA
Avenue Pasteur 4
1300 Wavre
BCE n° 0480.232.647
Tel. +32 (0)2 404 08 00
Mail: info@venturis.be

WHERE DOES THE DATA COME FROM?

- The person concerned (customer or prospect) communicates them directly to us in order to obtain information on our services or with a view to concluding a collaboration agreement, possibly at trade fairs, events, networking, sales meetings, the website, etc.
- In the case of debtor data (any person obliged to make a payment to another), our customers send it to us so that we can carry out our duties. This data may be supplemented/corrected by our subcontractors, third-party processors, legal partners or the debtor himself/herself.
- We may also collect information directly from our debtors when we ourselves become the holder of the debts to be recovered.
- Candidates provide us with this information as part of their recruitment process and with a view to concluding a potential contract (self-employed or employee), and employees provide it as part of their human resources management and payroll administration.
- Suppliers send us their own data when the contract for the supply of goods or services is concluded. Their data is only processed for the purpose of executing the contract entered into between the parties.

¹ REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (<https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX:32016R0679>).



WHAT DATA DO WE COLLECT, FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS?

The data collected on our various media, the use we make of it, the legal basis authorising us to process it and the length of time it is kept are shown in the table below.

Data	Purpose	Legal basis	Conservation
Processing linked to the debt collection mission			
<ul style="list-style-type: none"> • First name and surname • Business address • Telephone and email 	Managing our customers, suppliers and partners	Performance of a contract or, as the case may be, our legitimate interest	For the duration of the contract or partnership plus 1 year.
<ul style="list-style-type: none"> • First name and surname • Personal and professional e-mail address • Postal address • Telephone • Date of birth and age • Place of birth • Gender • Internal file ID (file number) • External file ID (debtor number at the creditor) • Debts to our customer • Debt details (amounts, etc.) • Factual elements relating to the claim • Type of debt and supporting documents (copies of invoices, subscriptions, etc.) • Transaction history and balance • Household composition 	Debt collection : <ul style="list-style-type: none"> • Sending and receiving formal notices • Debtor interaction via the VENTURIS portal • Reminders in the event of default (by telephone or home visit notice) • Setting up an amicable conciliation procedure • Setting up and monitoring the judicial recovery phase (with transfer of the file to a bailiff and/or a law firm). 	<ul style="list-style-type: none"> • Existence of a mandate conferred by our customer (the debtor's creditor) to pursue the recovery of debts owed and ensure the proper management of formal notices. • Our customers' legitimate interest in pursuing the recovery of the debt • Our own legitimate interest when VENTURIS acts as creditor/processor • Compliance with legal collection obligations 	The length of time we retain debtor data is determined by the contract we have with our customers and can vary considerably.
<ul style="list-style-type: none"> • First name and surname • Postal address • Personal and professional e-mail address • Telephone and email • Age and date of birth • Place of birth • Gender • Internal file ID (file number) • External file ID (debtor number at the creditor) • Debts to our customer • Debt details (amounts, etc.) • Factual elements relating to the claim • Type of debt and supporting documents (copies of invoices, subscriptions, etc.) • Transaction history and balance • Household composition • Judicial data 	Transmission and follow-up of collection files to our partner bailiffs or our partner lawyers in the context of judicial collections.	<ul style="list-style-type: none"> • Legitimate interest of our customers to pursue the recovery of their debts. • Our own legitimate interest when acting as creditor/processor 	The length of time we retain debtor data is set by the contract we have with our customers and can vary considerably. In particular, it depends on the duration of the collection procedure.
<ul style="list-style-type: none"> • All Data communicated in the context of the call and necessary for the proper execution of the collection mission. 	Voice logs of incoming (IN) and outgoing (OUT) calls for quality control and traceability purposes.	<ul style="list-style-type: none"> • Our legitimate interest in ensuring the quality and traceability of incoming and outgoing calls • Our contractual obligation to control the quality demanded by our customers. 	The length of time we retain debtor data is set by the contract we have with our customers and can vary considerably. In particular, it depends on the duration of the collection procedure.
Data processing relating to the https://www.venturis.be/ website			



<ul style="list-style-type: none"> • First name and surname • Telephone and email • Company number 	Responding to your query from our website	Our legitimate interest	The time strictly necessary to respond to your request
<ul style="list-style-type: none"> • Your IP address • Technical data relating to your visit to our website. 	As part of the management of cookies on our website	Your consent	For more information, see the "Cookies" section below.
<ul style="list-style-type: none"> • First name and surname • E-mail address • User id • Password • Account balance • Supporting documents (invoices) • Payment plans • Exchange of letters • Company number • Function 	Enable debtors and customers to access their account online, view balances and supporting documents, check the status of collection cases and communicate with VENTURIS.	Our legitimate interest in fulfilling the contracts we have entered into	Up to 10 years after the closure of a file for accounts receivable and up to 7 years after the last invoice for accounts receivable.
Treatment related to VENTURIS activities			
<ul style="list-style-type: none"> • First name and surname • Telephone and email 	Commercial prospecting	Our legitimate interest	5 years
<ul style="list-style-type: none"> • First name and surname • Postal address • Telephone and email • Language • Identity card number • Age and date of birth • Place of birth • Civil status • Nationality • Interests • Quality • Professional and academic background • Timetables, hours worked, absences and attendance • Date of entry into service and exit • Social security number • Bank account number • Data relating to salaries and any debts, attachments and bonuses • Insurance data 	HR processing (recruitment, human resources management and payroll administration)	<ul style="list-style-type: none"> • Your consent (the data you give us) ; • Processing necessary for the performance of a contract or pre-contractual measures • Possibly our legitimate interests. 	<ul style="list-style-type: none"> • 1 year for applications (or longer with your consent) • 5 years after the end of the employment contract, except in the event of a dispute
<ul style="list-style-type: none"> • Full name • Email address • Civility 	Sending newsletters	<ul style="list-style-type: none"> • Your consent if you are a prospect • Our legitimate interest if you are a VENTURIS customer 	<ul style="list-style-type: none"> • Maximum 3 years after your last contact.



COOKIES

In addition to the collection of personal data via a contact form or the use of another form, certain data may be collected via cookies placed on the website.

A cookie is a file placed by a website on the browser you use to surf the Internet. It is used to recognise you each time you visit the site concerned. Cookies may be placed by the owner of the website or by external service providers, depending on their purpose as explained below.

The various cookies used on our site are as follows:

Technical or functional cookies.

These are cookies placed by the website you are visiting in order to facilitate your browsing, such as those that remember the language you are using.

These cookies are :

Name	Usefulness	Expiration after
hs	Guarantees the security of visitors' browsing experience by preventing the falsification of cross-site requests.	Session
iconifier0	Used by the website's content management system (CMS) to determine how the website's menu tabs are used	Persistent
iconify-count	Used by the website's content management system (CMS) to determine how the website's menu tabs are displayed.	Persistent
iconify-version	Used by the website's content management system (CMS) to determine how the website's menu tabs are used	Persistent
TS #	Used to ensure website security and fraud detection	Session
XSRF-TOKEN	Guarantees the security of visitors' browsing experience by preventing the falsification of cross-site requests.	Session

Statistics cookies.

Third-party cookies are used to measure website traffic and determine the different profiles of internet users browsing the site (anonymously). These are Google Analytics and/or Google Adwords.

Cookies are stored on your browser and transmit the requested information to the website owner and its external service providers. However, you can delete these cookies at any time by going to your browser history.

These cookies are :



Name	Usefulness	Expiration after
fedops.logger.sessionId	Records statistical data on user behaviour on the website. Used for internal analysis by the website operator.	Persistent

Under no circumstances will the data collected be passed on to third parties, nor used for purposes other than those listed above.

Marketing cookies

Marketing cookies are used to track visitors through the Site. The aim is to display advertisements that are relevant and interesting to the individual user and therefore more valuable to third party publishers and advertisers.

The legal basis for this processing is your consent.

You can withdraw your consent at any time by clicking on the cookies banner on the site.

These cookies are :

Name	Usefulness	Expiration after
svSession	Follows a visitor on all w ix.com sites. The information collected may be used to make advertising more effective. relevant to visitors.	2 years

Under no circumstances will the data collected be passed on to third parties, nor used for purposes other than those listed above.

TO WHOM MAY WE COMMUNICATE YOUR PERSONAL DATA?

VENTURIS requires its processors to comply with Data protection legislation and to provide sufficient guarantees regarding the implementation of appropriate technical and organisational measures, so that processing meets the requirements of applicable Data protection legislation and guarantees the protection of your rights.

In order to comply with these contracts and agreements, VENTURIS may have to share data with bailiffs, law firms, OCMWs or debt mediators.



WHAT MEASURES DOES VENTURIS TAKE AGAINST MISUSE OR UNAUTHORISED ACCESS?

The personal data processed is stored in a secure environment within the European Union.

The people involved in managing your file only have access to the personal data they need to carry out their task. All our staff and partners are legally, statutorily or contractually obliged to guarantee the confidentiality of your personal data.

In order to prevent, among other things, unauthorised access, illegal use, loss or unauthorised changes to your data, the following security measures have been taken:

- only authorised personnel have access to personal data;
- only those persons who process personal data have access to it;
- logistical and IT protection ;
- use of strong passwords and other active access control devices (e.g. EID);
- firewall ;
- appropriate technical and organisational security measures that comply with the RGPD.

LINKS TO OTHER WEBSITES AND SERVICES

Our sites may contain links to third-party sites.

We have no control over how third party sites and services treat your personal information. We do not review third-party sites and services, and we are not responsible for these third-party sites and services or their privacy practices. Please read the privacy statements of any third party sites or services you access from our sites or services.

WHAT ARE YOUR RIGHTS?

- Right of access: you have the right to consult your Data at any time and free of charge,
- Right of rectification: you have the right to demand that incorrect Data be corrected and that Data that is inappropriate or no longer necessary be deleted. We draw your attention to the fact that you are obliged at all times to check the accuracy of the Data that you communicate to us.
- Right to erasure: if you no longer wish your Data to be processed and you qualify for the right to erasure, we will delete your Data from our database.
- Right to portability: insofar as is necessary, you will also have the right to port your Data under the conditions laid down by the applicable Data protection legislation.
- Right to object: you have the right to object to any use of your Data for canvassing purposes.
- Right to limit processing: lastly, you have the right to obtain from VENTURIS the limitation of the processing of your Data, in accordance with the applicable Data protection legislation.



WHERE AND HOW CAN YOU EXERCISE YOUR RIGHTS?

Please be as specific as possible in your request, so that we can deal with it correctly and efficiently.

When you exercise a right, we may ask you to prove your identity in order to prevent someone else from exercising your rights in your place. A copy of your identity card may therefore be requested.

To exercise your rights, please contact the data controller:

VENTURIS SA
Avenue Pasteur 4
1300 Wavre
ECB no. 0480.232.647
Tel. +32 (0)2 404 08 00
Mail: info@venturis.be

Would you like more information or have a complaint?

You can contact **the Data Controller**:

VENTURIS SA
Avenue Pasteur 4
1300 Wavre
ECB no. 0480.232.647
Tel. +32 (0)2 404 08 00
Mail: info@venturis.be

For further information or to assert your rights regarding the protection of personal data processed by our firm, you may also contact our **Data Protection Officer** (an independent officer external to our firm):

GDPR Agency SRL
Chemin du Cyclotron 6
1348 Louvain-la-Neuve
Tel: 010/87.11.70
Mail: dpo@venturis.be

Finally, you can also request information or lodge a complaint with the Belgian Data Protection Authority :

Data Protection Authority
Press Office 35, 1000 Brussels
Telephone: +32 (0)2 274 48 00
Fax : +32 (0)2 274 48 35
Mail : contact@apd-gba.be
Website : <https://www.autoriteprotectiondonnees.be/>
Contact and access to forms: <https://www.autoriteprotectiondonnees.be/contact>



LIMITATION OF LIABILITY CLAUSE

The liability of VENTURIS NV shall be limited to direct damage, to the exclusion of any indirect damage. VENTURIS NV may never be held liable for damage deemed to be indirect such as, but not limited to, loss of Data, financial or commercial loss, loss of profits, increase in overheads, disruption of planning.

In addition, VENTURIS NV cannot be held liable for any damage resulting from illegitimate manipulation of the Data by third parties (theft of Data, viruses, phishing or other computer crimes).

APPLICABLE LAW AND JURISDICTION

This Privacy Policy shall be governed by, interpreted and enforced in accordance with Belgian law, which shall be the sole applicable law in the event of any dispute.

Any dispute which cannot be settled amicably within a period not exceeding one month from the date of its occurrence, which period may be extended by mutual agreement, may be brought by the most diligent party before the French-speaking Courts and Tribunals of the judicial district of BRABANT WALLON, which shall have sole jurisdiction.

CHANGES TO OUR PRIVACY POLICY

VENTURIS S.A., the data controller, may modify its confidentiality and personal data protection policy at any time.

We therefore invite you to consult the latest version of our privacy policy on our website.

