
Date update: Wednesday November 4th 2020

Preamble

This privacy policy defines the way in which CHANGE-IT BV informs the users and uses and protects the personal data transmitted to the company. Any access and/or use of the website implies acceptance and compliance with all conditions of this privacy policy and the unconditional acceptance thereof. It is therefore a contract between CHANGE-IT BV and the user. This privacy policy can be adjusted or supplemented at any time by CHANGE-IT BV, in particular to comply with all legal or technological developments, or legislation and regulations. In that case, the date of the update will be clearly indicated at the top of this policy. These changes bind the user as soon as they are placed online. It is therefore advisable for the user to consult this privacy and cookies policy regularly to take note of any changes.

1. Personal data

CHANGE-IT BV undertakes to carry out the collection and processing of personal information in accordance with the amended law no. 78-17 of 6 January 1978 relating to data processing, files and freedoms, hereafter referred to as the “Computer Science and Freedom Act” and the General Data Protection Regulation of 27 April 2016 (hereafter “GDPR”). This is why CHANGE-IT BV informs its users about the following points:

1.1 Definition of personal data

“Personal data” means any information that could result in the identification of an individual.

1.2 Handling of personal data

The handling of personal data includes any operation that is performed manually or where automated processes apply to personal data. This may include collecting, registering, organizing, structuring, retaining, adjusting or modifying, extracting, consulting, using, communicating through transmission, distributing or any other form of communication, accessing or interconnection, limiting, deleting or destroying such data.

1.3 Data controller

The company responsible for the handling of data is CHANGE-IT BV.

Phone: +32 496 105 377

1.4 Nature of the collected data

CHANGE-IT only collects the data necessary and relevant for the desired goals (proportionality principle). These can be:

- first name and surname
- e-mail address
- login and password
- any other personal data that is useful for the purposes set out in Article 1.5 below.

The information that CHANGE-IT BV should collect originates from:

- the voluntary registration of an e-mail address with which the user can log in
- the input of the personal data of the user when registering
- data from the navigation of the user on the website via cookies and other technologies

If the above data is supplied online, CHANGE-IT BV can also collect it offline. This privacy policy therefore applies regardless of the collection method used.

In addition, CHANGE-IT BV may use tools or software with which, in accordance with current legislation, non-personal data can be collected via the terminal of the user. “Non-personal information” includes all information that does not result in the identification of a person. This data is anonymous, processed in aggregate form and is not linked to the personal data of the user. It is used as described in the processing of personal data via CHANGE-IT BV (referred to in Article 1.9), for analysis and statistics and/or to enable CHANGE-IT BV to improve its services.

1.5 Intention of the collected data

The personal data is generally collected for the purposes of the activities of CHANGE-IT BV, such as the improvement of marketing and advertising campaigns, the continuous development of the functionalities and services to better meet the needs of users or to comply with statutory reporting requirements.

Depending on the case, the applications are as follows:

- enable the user to:
 - manage his subscription (registration and deregistration)
 - request information
 - open and manage an account
 - subscribe to a commercial service or support service
- inform Change-iT bv who has accessed or downloaded the items on the website and get in touch with this person

In that way, CHANGE-IT BV may also use the e-mail address of the user for administrative purposes or other non-marketing purposes (for example to inform him of important changes to the website, or for other reasons described in Article 1.9).

1.6 Storage period

The data entered by the users are kept by CHANGE-IT BV for the duration of the contractual relationship that results from the creation of a user account. The data is then stored for archiving purposes. However, if the user cancels his/her account and thereby terminates the contract, all underlying personal data will be deleted.

1.7 Rights of users

The data is processed on the following legal basis:

- Your consent regarding the visit to our website.
- A contractual relationship as soon as you purchase our services / products.

If you object to the processing of your data, the agreement can no longer exist and you cannot make further use of our services.

Under the applicable regulations, the user remains the owner of his/her personal data and therefore has the freedom to check the existence, the destination, the content and the size at any time.

As a result of the application of the Informatics and Freedom Act and the GDPR, users can make free use of the rights stated below and exercise them.

Right of access

The possibility to obtain confirmation from the data controller that the personal data are being processed and, if applicable, the possibility to ascertain the purpose of the processing, the category of the data used, the recipients of the data, the storage period of the data or the criteria used to determine this duration, the right to request rectification and deletion of the data, the limitation of their handling and the possibility of opposing these manipulations, or information concerning the transfer of personal data to a third party.

Right to rectification

The right to obtain updates or rectifications from the data controller responsible for the processing of the incorrect personal data.

Right to removal

The right to obtain confirmation from the data controller that the personal data are deleted when they are no longer required for the purposes for which they are being treated, when the data subject

withdraws his consent, if he objects to his right to oppose the treatment or if the processing of the data is unlawful.

Right to restriction

The right to obtain the restriction of treatment from the data controller if the processing of the data is unlawful, when the data is no longer necessary for processing, but is still useful for setting up, exercising or defending a right in court or when the person concerned objects to processing due to his right to object.

Right to transfer data

The right to receive the data obtained by the data controller in a readable, structured and widely used format and the possibility to transfer it unhindered to another person responsible for processing.

Right to object

The right to object at any time, for reasons relating to a person's specific situation, to the handling of his personal data, in particular when these data are processed for the purposes of prospecting, profiling, for historical, scientific or statistical research purposes. The data controller can continue this processing if he provides evidence that this is necessary for a legitimate and compelling reason that prevails over the interests and rights and freedoms of the person concerned.

These rights apply to all personal data of the users.

Users can exercise these rights by contacting:

- By post to the following address: CHANGE-IT BV, Pierre Toebenteplein 7 bus 2, 2845 Niel.
- By e-mail to the following address: info@change-it.works. CHANGE-IT BV has a period of one month from receipt of the request to provide an answer.

In some cases, the user can also exercise these rights directly:

- If he is registered: he has access to his data at any time and can change or delete them by logging on to his member space on the website.
- If he subscribes to one of the newsletters of CHANGE-IT BV: he can unsubscribe at any time by clicking the link to unsubscribe, at the bottom of every e-mail received or in his member space on the site.
- With regard to cookies, he has direct means to object, as specified below in Article 2.3.

Moreover, if the users are of the opinion that the processing of their personal data is not in accordance with the laws and regulations in force, they have the possibility to file a complaint.

1.8 Security of the data and the persons for whom they are intended

CHANGE-IT BV undertakes to secure and protect the personal data the user wants to communicate, to ensure the confidentiality of this data and to prevent it being forged, damaged, destroyed or disclosed to unauthorized third parties.

The company therefore uses physical, electronic and procedural safeguards, which basically ensure the protection of data against misuse, loss and unauthorized access, disclosure, alteration and destruction.

However, although CHANGE-IT BV does everything possible to protect personal data, due to the inevitable risk of data transmission via the internet, the total protection against errors occurring during the transmission of personal data cannot be guaranteed if it is beyond reasonable control of CHANGE-IT BV.

Since personal data may be confidential, their access is restricted to employees or service providers who need this information to perform their duties.

All persons who have access to the personal data of users are bound by a duty of confidentiality and are subject to disciplinary sanctions and/or other sanctions if they do not comply with these obligations.

Note: the user is responsible for the confidentiality of his password and information that appears in his account. He undertakes to save this password and to pass it on to no one else. CHANGE-IT BV works with strong passwords with these minimum requirements: at least 8 characters, at least 1 number, at least 1 lowercase letter, at least 1 capital letter, at least 1 non-alphanumeric character. This is part of all reasonable/possible means used to optimize security.

1.9 Forwarding of personal details

CHANGE-IT BV may disclose personal information to third parties if they are of the opinion that such disclosure is necessary for technical reasons (such as hosting services) or to protect the legal interests of the company (for example, in case of takeover, merger with a third party or partial or full liquidation). CHANGE-IT BV will always communicate this to the user via the existing media (e.g. e-mail).

We share your personal data with your consent or as needed to complete a transaction or deliver a product you have requested.

When you provide payment information to make a purchase, we will share payment information with banks and other entities that process payment transactions or provide other financial services, and for fraud prevention and credit risk reduction.

The data of the user never leave the company.

Structurally and technically, CHANGE-IT BV works together with the following parties that are also GDPR compliant under their own privacy policy:

MindQuest bv: ICT-integrator and private cloud hoster for CHANGE-IT BV

Leuvestraat 29b

9320 Erembodegem, België

www.mindquest.be

ZenCares sprl: Hosting provider en ICT-developer for CHANGE-IT BV

Weiswampach, Luxembourg

www.zencares4.me

By using the website, the user agrees that CHANGE-IT BV and its aforementioned partners may use their personal data for processing purposes in the context of technical necessity.

CHANGE-IT BV may also release such personal information if there is a legal obligation or if they believe in good faith that such disclosure is necessary in the context of legal proceedings (e.g. warrant, summons or other court order) or to protect the rights, property or personal safety of the company, its customers or the public.

Such transfers are made with any method that CHANGE-IT BV deems appropriate and in accordance with the applicable legislation.

CHANGE-IT will not sell or send your personal information to third parties, nor made public.

Change-iT reserves the right to use or disclose your data, when this is necessary to safeguard the integrity of the website, when required by law, when the processing is of vital importance to you, when the processing must take place to fulfill a task of public interest or when the data processing is necessary to pursue a legitimate interest.

Finally, and to the extent that you expressly agree in advance, we may share your personal data with suppliers who are contractually bound to us and who offer services or products that may interest you.

You can withdraw your consent at any time.

1.10 Links to other websites and social networks

The website may occasionally contain links to third party websites. Since these websites have their own privacy policy, CHANGE-IT BV declines any responsibility for the use of the information these sites collect when the user clicks on these links.

2. Cookies

2.1 What is a cookie

A cookie is a text file that is used when browsing through websites. It is placed in a designated space on the hard disk of a user terminal (computer, tablet, mobile phone or any other internet-optimized device) while consulting online content or ads. It is used to personalize the pages by adapting them to the profile of the user and contains collected data such as, depending on the case, the name, the e-mail address, the time and the day of connection, the computer operating system of the user, website pages visited, ...

Cookies can be permanent (and remain stored after the visit to the site, to be used for later visits) or temporarily (and disappear when leaving the site).

2.2 Function of cookies

CHANGE-IT BV uses 5 types of cookies:

- session cookies, to allow the user to remain connected without having to enter the same information several times to perform the same task
- rights management cookies that, based on the user's authorization level, allow him to edit elements of the website (content of pages, objects)
- communication cookies, to use the chat module of the website correctly
- ads management cookies, to exclude the user from advertising campaigns
- statistical cookies, with which CHANGE-IT BV can measure and analyze the visits of the website

The company can use the services of external suppliers to handle statistical cookies.

2.3 Choice and methods of acceptance or objection against cookies

When a user surfs on the website, cookies activate by default and the user can read or store data locally on his device.

The user will be notified the first time he receives a cookie and can decide to accept or reject it. By continuing to use the site, the user explicitly accepts the use of such cookies by CHANGE-IT BV.

However, he can also configure his browser to systematically refuse cookies (including cookies used to count the number of visitors). If this is the case, some functions and features of the website may not work correctly. On top of that the user may not be able to access certain parts or services on the site.

3. Contact

For questions about this privacy policy or for any request regarding his personal data, the user can contact CHANGE-IT BV via e-mail to the address: info@change-it.works.