

## PRIVACY POLICY

### 1. CONFIDENTIALITY AND SECURITY OF YOUR DATA: MYSPECIALIST COMMITS ITSELF

The privacy and the security of your personal information is extremely important to Myspecialist. The purpose of this Privacy Policy is to explain how, the Public Service Myspecialist (hereinafter "**Myspecialist**") collects, stores, processes, uses and transfers your personal data. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you. The set of operations which are performed upon personal data, whether or not by automatic means, is called data "processing" and this is done in compliance with the General Data Protection Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).

**1.1** Access to the [www.myspecialist.be](http://www.myspecialist.be) (hereinafter "the **Website**") implies full and unconditional acceptance by the Users (hereinafter "**Users**") of this Privacy Policy (hereinafter "the **Charter**"), as well as its Terms of Use (hereinafter the "**ToU**").

**1.2** The Users acknowledges having read the information below and authorizes Myspecialist to deal, in accordance with what is specified below, with the personal data he/she communicates on/to the Website within the framework of the service proposed by Myspecialist (hereinafter the "**Service**").

**1.3** By providing information to Users, Myspecialist may be required to amend and adapt the Charter, in order to comply with any new applicable legislation and/or regulations, such as the adoption of the new European regulation in dealing with the personal data, the recommendations of the Belgian Privacy Commission, the guidelines, recommendations and good practice of the European Data Protection Committee and the decisions of courts and tribunals in this field.

**1.4** The Charter is valid for all the hosted pages on the Website and for the savings of this Website. It is not valid for the hosted pages by third parties that Myspecialist may redirect to and where their privacy policies may differ Myspecialist cannot be held responsible for any data processed on these Websites or by them.

### 2. RESPONSIBLE FOR PROCESSING

**2.1** Access to the Website shall in principle be possible without having to provide personal data, such as, for example, surname, first name, postal address, e-mail address, etc.

**2.2** However, as part of the Service, the Users may be required to transmit certain personal data. In such case, the person in charge of processing these data is MYSPECIALIST SRL: Avenue de l'Horizon, 34 - 1150 Woluwe-Saint-Pierre TVA : BE 1020.878.874

**2.3** Any question or request concerning the processing of these data may be addressed to the following address: [help@myspecialist.be](mailto:help@myspecialist.be)

### **3. COLLECTED INFORMATION**

#### **3.1 DATA TRANSMITTED TO MYSPECIALIST BY ACTIVE INTERVENTION OF USERS**

By browsing the Website, filling out forms or newsletters on the Website, through the mobile application or social networks linked to Myspecialist, the Users allows Myspecialist to register and maintain, for the purposes mentioned in point 4, the following information:

- identification data, such as surname and first name, gender, e-mail address, date of birth and contact information;
- communications between Users and Myspecialist;
- the additional information requested by Myspecialist from the Users in order to identify or prevent him/her from breaching any of the provisions of the Charter;
- and any other information voluntarily transmitted to Myspecialist by the Users for a determined purpose in the Charter, in the ToU, on/to the Website or on any other communication tool used by Myspecialist.

#### **3.2 DATA AUTOMATICALLY TRANSMITTED TO MYSPECIALIST WHEN CONSULTING THE WEBSITE**

In order to facilitate browsing the Website and optimize technical management, the Website may use "cookies".

A "cookie" is a small file containing information saved by a website on the computer or an application on the Users' smartphone. This "cookie" can be retrieved during a subsequent visit to the same application or website. The "cookie" cannot be read by another website than the one that created it. The Website uses "cookies" for the purposes of good administration of the Website, in particular to save the Users' browsing preferences, or to obtain information on the visited pages and the dates and times of visit.

Most "cookies" only work for a session or a single visit. It is also possible for the Users to set up his browser to be informed during each creation of "cookie" or to prevent their saving, individually or not. However, disabling cookies may prevent access to certain parts of the Website or making access more difficult.

Subject to the prior consent of the Users, the Website may also allow the use of third-party cookies, including the following:

- Facebook, Twitter, LinkedIn

Myspecialist uses on its Website the social modules of social network providers Facebook, Twitter and LinkedIn. These social modules establish a direct connection to the server of the social network via the Users' browser. The social network provider on which the Users has clicked receives information that the Users has visited the Website. If the Users is registered and identified on the relevant social network, the provider can correlate the profile of the Users with the visited Website. The network provider can then establish future interactions. If the Users is not

registered with the social network, the provider can save the IP address of the Users. In order to avoid transferring these data to the social network provider, the Users must not click on the button corresponding to the social network.

– Google analytics

The Website also uses Google analytics. This service, offered by Google, analyzes the activity of the Website. For these purposes, Google collects information related to web traffic and the number of visitors. This tool allows Myspecialist to measure the performance of the Website in terms of browsing and to consolidate activity reports and other services.

### **3.2.2. REGISTERED INFORMATION ON VISITED SERVERS**

When the Users accesses the Website, the visited servers automatically save certain data, such as the type of domain with which the Users connects to the Internet, the IP address assigned to the, the date and time of access to the Website and other traffic data, location data or other communication data, viewed pages, type of browser used, platform and/or system, the search engine as well as the keywords used to retrieve the Website, etc. However, no personal data identifying the Users is collected through these savings. This information is kept for statistical and improvement purposes only.

## **4. PURPOSES OF PROCESSING**

### **4.1 GENERAL PURPOSES**

Without prejudice to what has been specified under point 3.2. concerning the automatically transmitted data, the Website collects, saves and processes the personal data of its Users in particular for the following purposes:

- to provide the Service;
- to analyze, adapt and improve the content of the Website;
- to carry out internal statistical surveys and market surveys and to deploy various statistical systems and studies;
- to detect and / or prevent fraud or similar activities of an illegal nature;
- to facilitate the provision and use of the Website and improve the Services offered by Myspecialist as well as the experience of the Users;
- to respond to requests for information;
- to inform them about the evolutions of the Website and its functionalities; and
- for any other purpose for which the Users has expressly consented.

### **4.2 COMMUNICATION TO THIRD PARTIES**

Myspecialist considers personal data as confidential information. It shall not communicate them to third parties under conditions other than those specified in the Charter or under the conditions in which it is required by law, including the competent authorities who request it.

In order to discover new products to its Users that maybe of interest to them, Myspecialist may also disclose the personal information of its Users to third parties, insofar as the Users have explicitly consented to it.

#### **4.3 TRANSFER TO A COUNTRY THAT IS NOT A MEMBER OF THE EUROPEAN ECONOMIC AREA**

Myspecialist does not transfer data to a country which is not a member of the European Economic Area unless it provides an adequate level of protection within the meaning of the law applicable, or within the limits permitted by the same law, for example by ensuring the protection of data by appropriate contractual provisions.

### **5. SECURITY**

**5.1** Myspecialist has taken the adequate measures to ensure that the servers hosting the processed personal data prevent, to the extent possible:

- the processing, access or unauthorized modification of these data;
- the inadequate use or disclosure of such data;
- and the unlawful destruction or accidental loss of such data.

**5.2** In this respect, Myspecialist employees who have access to these data are subject to a strict confidentiality obligation. Myspecialist cannot, however, be held liable for any misappropriation of these data by a third party in spite of the adopted security measures.

**5.3** The Users undertake not to commit any acts which may be contrary to the present Charter, the ToU or, generally, the law. Offenses against the confidentiality, integrity and availability of computer systems and saved data, processed or transmitted by such systems, or the attempt to commit any of these offenses, are punishable by three months to five years' imprisonment and by a fine of twenty-six euros to two hundred thousand euro by one of these penalties only.

### **6. RETENTION PERIOD**

Myspecialist will normally keep the personal data of its Users for the necessary duration for the accomplishment of the pursued purposes (see point 4). Myspecialist may also continue to maintain personal data provided by the Users in other ways, including any correspondence or request for assistance addressed to Myspecialist, in order to be able to answer any questions or complaints that may be addressed to it. In order to comply with all applicable laws (including taxation), in particular the conservation of information on payments made.

### **7. RIGHTS OF THE CONCERNED PERSON**

**7.1** The Users may at any time request access, rectification or, if necessary, deletion to/ from his/her personal data, with the exception of those which Myspecialist would have a legal obligation to keep, by sending a written request accompanied by a copy of his identity card or passport to the data controller:

- at the following postal address: Avenue de l'Horizon, 34 - 1150 Woluwe-Saint-Pierre
- or to the following email address: [privacy@myspecialist.be](mailto:privacy@myspecialist.be)

**7.2** Myspecialist will then take the necessary measures to satisfy this request as soon as possible.

**7.3** If the Users wish to raise a complaint on how we have handled the personal data, he/she can contact our Data Protection Officer at [claims@myspecialist.be](mailto:claims@myspecialist.be) who will investigate the matter. If the Users are not satisfied with our response or believe we are processing personal data not in accordance with the law, it is possible to complain to the Data Protection Authority <https://www.autoriteprotectiondonnees.be/>.

## **8. NOTE CONCERNING MINORS**

Persons under the age of 18 and persons who do not have full legal capacity are not permitted to communicate their personal data to Myspecialist.

## **9. APPLICABLE LAW AND COMPETENT JURISDICTION**

**9.1** The Charter shall be governed by the Belgian law to the fullest extent permitted by the applicable rules of private international law.

**9.2** In the event of a dispute concerning the validity, application, interpretation or enforcement of the Charter, the courts of the judicial district of Brussels (Belgium) shall have exclusive jurisdiction, to the fullest extent permitted by the rules of private international law.

**9.3** Before undertaking any legal dispute resolution, the Users undertakes to resolve the dispute by amicable means by contacting Myspecialist directly, if necessary by mediation, before resorting to arbitration, litigation, or any other means of dispute resolution.