

Privacy Policy

ADPO N.V.

This privacy policy applies to ADPO N.V. (“ADPO”, “we”, “us” or “our”) and explains how we collect, use, share, store and protect personal data, and what rights you have in relation to that data. ADPO respects the privacy and security of the personal data we process and complies with the EU General Data Protection Regulation (GDPR) and other applicable data protection legislation.

This policy applies to personal data we collect through our website, in the context of our commercial relationships with clients, suppliers and other business contacts, and in the context of our employment relationships.

1. Who we are

This website contains general information about ADPO N.V. and its divisions, subsidiaries and affiliates (“ADPO”). Such information is intended, but not guaranteed, to be correct, complete and up to date. The information on this website is subject to change and is provided without any warranty, whether express or implied, as to its quality, accuracy or fitness for a particular purpose. Information on this website must not be relied upon in connection with any decision without prior verification by the user.

ADPO N.V. is the data controller responsible for the personal data described in this policy, unless stated otherwise.

2. What personal data do we collect

The personal data we collect depends on the nature of our relationship with you (for example, as a website visitor, client, supplier, business contact, job applicant, employee, or visitor to our premises) and the purpose for which it is collected. This may include:

- Name and surname
- Address, telephone number and email address
- Date of birth and gender
- Job title and employer
- Marital status and family composition (for employees)
- Career and education details
- Wages, financial and fiscal data (for employees)
- Contractual agreements
- Complaints and requests you address to us
- IP address, browser type and language preference
- Online behaviour and preferences on our website
- Images and audiovisual material (e.g. from events or premises)
- Cookie data (see Section 7)
- Other information relevant to the performance of our services

In limited cases, we may process special categories of personal data, such as health information (for example, an allergy or medical condition we should be aware of when you visit our premises or attend a business event).

Our products, services and website are not designed for, or directed at, children. Except in relation to the children of our employees where relevant for HR purposes, we do not knowingly or intentionally collect personal data from children.

3. Who we collect personal data from

- Our clients, suppliers, business contacts and prospective clients (or their contact persons)
- Our contacts at government bodies and other public institutions
- Our employees and job applicants
- Visitors to our website and social media pages
- Visitors to our business premises
- Family members of our employees, where relevant

4. How we collect personal data

We collect personal data in various ways, in particular when it is provided to us:

- Directly by you
- By your employer or contracting party (for example, where you are appointed as a contact person by a client or supplier)
- By third parties, such as government bodies or recruitment agencies
- Through the use of our website, social media and other digital tools, including cookies
- From publicly available sources

5. Why and on what legal basis we process personal data

Except where we rely on your consent, we process personal data for the following purposes and on the following legal grounds (this list is not exhaustive):

5.1 Delivery of our products and services

We process personal data in order to deliver our products and/or services to our (prospective) clients, whether the data subject is the client itself, an employee of the client, or a contracting party (performance of a contract, pre-contractual measures, and/or our legitimate interest).

5.2 Compliance with legal obligations

In some cases we are legally required to process certain personal data, for example as an employer we must collect and, where applicable, disclose certain data (such as national register number, marital status and family situation) to competent authorities.

5.3 Administrative and financial processing

We process personal data for our own administrative, accounting and corporate purposes, based on our legitimate interest and legal obligations.

5.4 HR administration and recruitment

We process personal data of our employees and former employees within the context of personnel administration (performance of the employment contract and/or legal obligation), and personal data of job applicants in the context of recruitment (performance of a contract and, where applicable, consent for data voluntarily provided by the applicant).

5.5 Direct marketing

We have a legitimate interest in sending commercial communications, newsletters and invitations to events to our clients (or their contact persons) regarding products and services similar to those we have already provided to them. For all other electronic marketing, we will ask for your prior consent. We also have a legitimate interest in carrying out marketing activities by non-electronic means.

5.6 Collection of data through our website

We have a legitimate interest in processing the personal data of visitors who voluntarily submit data through our website (for example, via a contact form) in order to handle their request, and of visitors generally, in order to manage, secure and improve our website. See Section 7 (Cookies) for more detail.

5.7 Internal risk analysis, audits and security testing

We have a legitimate interest in processing personal data in the context of internal risk analyses, audits and security or penetration tests, whether carried out on our own initiative, on the initiative of an authorised third party (such as a competent data protection authority), or for contractual purposes.

5.8 Events and workshops

We have a legitimate interest in processing personal data in connection with organising events and workshops for our clients, including the related promotion through reports, videos and images published on our website and social media.

6. Who we share your information with

We only disclose personal data to commercial partners with your consent, or where this is necessary to deliver our products or services.

We also share personal data with our own processors (for example, our payroll provider, IT and social media partners), subject to a data processing agreement, and with other professionals acting as independent controllers (such as our lawyers or accountants), as well as with government authorities and inspection services where required.

We do not transfer personal data to recipients established outside the European Economic Area, except with your consent, where necessary to deliver our services to you or our client, or where we are legally required to do so (for example, pursuant to a court order). Where such a transfer takes place, it will be carried out in compliance with applicable legal requirements, including, where relevant, appropriate safeguards such as intra-group data protection rules or standard contractual clauses.

7. Cookies

We use cookies on our website. A cookie is a small text file placed on your device that allows us to collect information about how you use our website, so that we can optimise our

services. Where we use analytics cookies (for example, Google Analytics) or functional cookies, we will only do so on the basis of your prior consent where required by law.

Google Analytics is a web analytics service provided by Google. It uses cookies to help us understand how visitors use our website. Google will only share this information with third parties where legally required to do so, or where those third parties process the data on Google's behalf.

You can manage or withdraw your cookie consent at any time through your browser settings or, where available, our cookie banner.

8. How long we keep your personal data

We retain personal data for as long as necessary for the purposes for which it was collected. In practice, this means we retain personal data:

- For the duration of our liability period following the provision of our products or services
- For as long as we are legally required to retain it
- In the event of a legal, administrative or arbitration dispute, until a final decision has been reached, unless a longer legal retention period applies
- In all other cases, for a reasonable and proportionate period

For example, cookie data collected via Google Analytics is retained for 13 months.

9. How we protect your personal data

We maintain a security policy that is reviewed and updated periodically, including technical and organisational measures aimed at:

- Raising awareness of personal data handling among our employees, through training and periodic review
- Restricting access to personal data, both organisationally and technically
- Protecting personal data through appropriate technical measures (such as encryption, anti-virus software, firewalls and secure connections), taking into account the state of the art and the related costs and risks
- Ensuring the accuracy of personal data
- Ensuring confidential treatment of personal data
- Detecting, preventing and remedying data breaches to the extent possible

10. Your rights

As a data subject, you have the following rights in relation to the personal data we process about you:

- The right to transparency – to be informed about the processing of your personal data in clear and understandable language
- The right to access, rectify and erase your personal data
- The right to data portability, in a structured, machine-readable format
- The right to withdraw consent previously given
- The right to request restriction of, or to object to, the processing of your personal data

- The right to lodge a complaint with the competent supervisory authority

These rights are not absolute. In certain circumstances, we are entitled, or even legally obliged, to continue processing your personal data, or our duty of confidentiality may prevent us from disclosing certain information. Where this is the case, we will inform you accordingly.

You can exercise these rights free of charge, except in cases of clearly unfounded or excessive requests, in which case we may charge a reasonable administrative fee.

All requests relating to the exercise of your rights, or any other questions about this privacy policy, can be addressed to:

info@adpo.com

11. Links to other websites

Our website may contain hyperlinks or embedded content directing to other websites and social media platforms. These links are provided only for your convenience and do not imply any endorsement. ADPO has no control over such third-party websites, and this privacy policy does not extend to them, regardless of whether they belong to affiliates, subsidiaries or unrelated third parties.

12. Intellectual property

The content of this website is protected by copyright belonging to ADPO or its licensors. Users may not copy, transmit, distribute, display or create derivative works from any content on this website for commercial purposes without prior written consent.

13. Disclaimer

ADPO cannot be held liable for any direct, indirect or consequential loss arising from the use of, or the inability to use, this website or the information it contains, or from any action or decision taken as a result of it.

14. Governing law

This website, this disclaimer and this privacy policy are governed by, and shall be construed in accordance with, the laws of Belgium. Any disputes shall be subject to the exclusive jurisdiction of the competent courts of [city, Belgium].

15. Changes to this privacy policy

We may update this privacy policy from time to time to reflect changes in legislation, regulatory guidance, case law, or our own data processing practices. Any changes will take effect as soon as the updated policy is published on this page. We encourage you to review this page periodically. Your continued use of our website after any update constitutes your acknowledgment of the changes.

16. Contact

If you have any questions about this privacy policy, or if you wish to exercise any of your rights, please contact us at:

Info@adpo.com

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