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Data Privacy Policy – [www.verdonckadvisory.com](http://www.verdonckadvisory.com)

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## 1. What is this Privacy Notice about?

The Chris Verdonck BV (also «**we**», «**us**») collects and processes personal data that concern you but also other individuals («**third parties**»). We use the word «**data**» here interchangeably with «**personal data**».

«Personal data» means data relating to identified or identifiable individuals, which means that the relevant data, in combination with additional data, make it possible to draw conclusions about the identity of these individuals. In Section 3, you will find information about the data we process in accordance with this Privacy Notice. «Processing» means any operation that is performed on personal data, such as collection, storage, use, alteration, disclosure and erasure.

In this Privacy Notice, we describe what we do with your data when you use [www.verdonckadvisory.com](http://www.verdonckadvisory.com), obtain services or products from us, interact with us in

relation to a contract, communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this Privacy Notice.

If you disclose data to us or share data with us about other individuals, we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

## **2. Who is the controller for processing your data?**

The **Chris Verdonck BV**, Bosweg 10, 2990 Loenhout, Belgium (Chris Verdonck BV) is the controller for Chris Verdonck BV's processing under this Privacy Notice, unless we tell you otherwise in an individual case.

For each processing activity there are one or several parties that are responsible for ensuring that the processing complies with data protection law. This party is called the controller. It is responsible, for example, for responding to access requests (Section 11) or for ensuring that personal data is processed securely and not used in an unlawful manner.

Additional parties may be joint controllers for the processing set out in this Privacy Notice if they participate in determining the purpose or means of the processing. If you wish to receive information about the controllers for a specific processing activity, you are welcome to ask us as part of your access right (Section 11).

In Section 3, Section 7 and Section 12, you will find additional information about third parties with whom we work together and who are controllers for their processing. If you have any questions for these third parties or if you wish to exercise your rights, please contact them directly.

You may contact us for data protection concerns and to exercise your rights under Section 11 as follows: [chris@verdonckadvisory.com](mailto:chris@verdonckadvisory.com).

## **3. What data do we process?**

We process various categories of data about you. The main categories of data are the following:

- **Technical data:** When you use our website or other online offerings, we collect the IP address of your terminal device and other technical data in order to ensure the functionality and security of these offerings. This data includes logs with records of

the use of our systems. In order to ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (for example as a cookie, see Section 12). Technical data as such does not permit us to draw conclusions about your identity. However, technical data may be linked with other categories of data (and potentially with your person) in relation to user accounts, registrations, access controls or the performance of a contract.

- Technical data includes the IP address and information about the operating system of your terminal device, the date, region and time of use and the type of browser that you use to access our electronic offerings. This can help us to provide an appropriate layout of the website. We know through which provider you access our offerings (and therefore also the region) because of the IP address, but usually this does not tell us who you are. However, this changes for example when you create a user account, because personal data can then be linked with technical data (for example, we can know the browser you use to access an account through our website). Examples of technical data include protocols («logs») that are created in our systems (for example the log of user logins to our website).
- **Registration data:** Certain offerings, and services (such as login areas of our website), can only be used with a user account or registration, which can happen directly with us or through our third-party login service providers. In this regard you must provide us with certain data, and we collect data about the use of the offering or service. If you redeem a voucher issued by us, we may require certain data from you at the time of redemption.
- Registration data includes the information you provide when you create an account on our website (for example username, password, name, e-mail). It also includes the data that we may require from you before you can use certain free services.
- **Communication data:** When you are in contact with us via the contact form, by e-mail, telephone, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication. If we record or listen in on telephone conversations or video conferences, for example for training and quality assurance purposes, we will tell you specifically. Such recordings may only be made and used in accordance with our internal policies. You will be informed if and when such recordings take place, for example by an indication during the video conference in question. If you do not want to be recorded, please notify us or leave the (video) conference. If you simply do not want your image to be recorded, please turn off your camera. If we have to determine your identity, for example in relation to a request for information, etc., we collect data to identify you. We generally keep this data for 18 months from the last exchange between us. This period may be longer where required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondence are generally kept for at least 10 years.

Communication data is your name and contact details, the means, place and time of communication and usually also its content (i.e. the content of e-mails, letters, chats, etc.). This data may also include information about third parties.

- **Master data:** With master data we mean the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details, your date of birth, customer history, powers of attorney, signature authorizations and declarations of consent. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner), or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing and advertising). We receive master data from you (for example when you make a purchase or as part of a registration), from parties you work for, or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, etc.).

We generally keep master data for 10 years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. For contacts used only for marketing and advertising, the retention period is usually much shorter, usually no more than 2 years from the last contact.

Master data includes data such as name, address, e-mail address, telephone number and other contact details, gender, date of birth, nationality, data about related persons, websites, moreover, details of your relationship with us (customer, supplier, visitor, service recipient, etc.), details of your status, allocations, classifications and mailing lists, details of our interactions with you (if applicable, a history thereof with corresponding entries), reports (for example from the media), or official documents (for example excerpts from the commercial register, permits, etc.) that concern you. As payment information, we collect, for example, your bank details, account number and credit card data. Declarations of consent and opt-out information are also part of the master data, as well as information about third parties.

In relation to contact persons and representatives of our customers, suppliers and partners, master data includes, for example, name and address, information about the role or function in the company, qualifications and (where applicable) information about superiors, co-workers and subordinates and information about interactions with these persons.

Master data is not collected comprehensively for all contacts. The data collected in an individual case depends mostly on the purpose of the processing activity.

- **Contract data:** This means data that is collected in relation to the conclusion or performance of a contract, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback.

We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for 10 years from the last contract activity or from the end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.

- **Behavioral and preference data:** Depending on our relationship with you, we try to get to know you better and to tailor our products, services and offers to you. For this purpose, we collect and process data about your behavior and preferences. We do so by evaluating information about your behavior in our domain, and we may also supplement this information with third-party information, including from public sources. Based on this data, we can for example determine the likelihood that you will use certain services or behave in a certain way. The data processed for this purpose is already known to us (for example where and when you use our services), or we collect it by recording your behavior (for example how you navigate our website). We anonymize or delete this data when it is no longer relevant for the purposes pursued, which may be – depending on the nature of the data – between 2-3 weeks and 24 months (for product and service preferences). This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. We describe how tracking works on our website in Section 12.
- **Other data:** We also collect data from you in other situations. For example, data that may relate to you (such as files, evidence, etc.) is processed in relation to administrative or judicial proceedings.
- If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided.

#### 4. For what purposes do we process your data?

We process your data for the purposes explained below. Further information is set out in Sections 12 and 13 for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to **communication** with you, in particular in relation to responding to **inquiries** and the **exercise of your rights** (Section 11) and to enable us to **contact** you in case of queries. For this purpose, we use in particular

communication data and master data. We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

We process data for the conclusion, administration and performance of **contractual relationships**.

We process data for **marketing purposes** and **relationship management**, for example to send our customers and other contractual partners personalized advertising for products and services from us and from third parties. This may happen in the form of regular contacts, through channels for which we have contact information from you, but also as part of marketing campaigns. You can object to such contacts at any time (see at the end of this Section 4) or refuse or withdraw consent to be contacted for marketing purposes. With your consent, we can target our online advertising on the internet more specifically to you (see Section 12). We further process your data for **market research**, to **improve our services and operations**, and for **product development**. We may also process your data for **security** and **access control purposes**. We process personal data to **comply with laws, directives and recommendations from authorities and internal regulations** («**Compliance**»). We also process data for the purposes of our **risk management** and as part of our **corporate governance**, including business organization and development. We may process your data for **further purposes**, for example as part of our internal processes and administration.

## 5. On what basis do we process your data?

Where we ask for your **consent** for certain processing activities, we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future; see our contact details in Section 2. For withdrawing consent for online tracking, see Section 12. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for **initiating or performing a contract** with you (or the entity you represent) or on our or a third-party **legitimate interest** in the particular processing, in particular in pursuing the purposes and objectives set out in Section 4 and in implementing related measures. Our legitimate interests also include compliance with **legal regulations**, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the EEA and in the case of the DPA, Swiss law).

Where we receive sensitive personal data (for example health data, data about political opinions, religious or philosophical beliefs, and biometric data for identification purposes), we may process your data on other legal basis, for example, in the event of a dispute, as required in relation to a potential litigation or for the enforcement or defense

of **legal claims**. In some cases, other legal basis may apply, which we will communicate to you separately as necessary.

#### **6. What applies in case of profiling and automated individual decisions?**

We may automatically evaluate personal aspects relating to you («**profiling**») based on your data (Section 3) for the purposes set out in Section 4, where we wish to determine preference data, but also in order to detect misuse and security risks, to perform statistical analysis or for operational planning. We may also create profiles for these purposes, i.e. we may combine behavioral and preference data, but also master data, contract data and technical data relating to you in order to better understand you as a person with your various interests and other characteristics.

In both cases, we pay attention to the proportionality and reliability of the results and take measures against misuse of these profiles or profiling. Where these can produce legal effects concerning you or similarly significantly affect you, we generally ensure human review.

#### **7. With whom do we share your data?**

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 4, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **Service providers:** We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers (for example IT providers, login service providers, security companies, banks, insurance companies, debt collection companies). Most important Service providers used for the website: Webflow, Stripe, Memberstack, Zapier, and PDF Monkey.
- **Contractual partners including customers:** This refers to customers (for example service recipients) and our other contractual partners as this data disclosure results from these contracts. If you work for one of these contractual partners, we may also disclose data about you to that partner in this regard. These recipients also include contractual partners with whom we cooperate .

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

#### **8. Is your personal data disclosed abroad?**

As explained in section 7, we disclose data to other parties. These are located in Switzerland, Europe and US.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we

use the revised European Commission's standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

Many countries outside of Switzerland or the EEA currently do not have laws that ensure an adequate level of data protection under the DPA or the GDPR. The contractual arrangements mentioned compensate for this weaker or missing legal protection to some extent. However, contractual precautions cannot eliminate all risks (namely of government access abroad). You should be aware of these remaining risks, even though they may be low in an individual case, and we take further measures to minimize them.

Please note that data exchanged via the internet is often routed through third countries. Your data may therefore be sent abroad even if the sender and recipient are in the same country.

## **9. How long do we process your data?**

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section 3, and for cookies in Section 12. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

More

Documentation and evidence purposes include our interest in documenting processes, interactions and other facts in view of legal claims, inconsistencies, IT and infrastructure security requirements and demonstrating good corporate governance and compliance. Retention may be a technical requirement if certain data cannot be separated from other data and we therefore need to keep it with it (for example in case of backups or document management systems).

## **10. How do we protect your data?**

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.



## 11. What are your rights?

**Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.**

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;

**If you wish to exercise the above-mentioned rights in relation to us**, please contact us in writing or by e-mail; you will find our contact details in Section 2. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties or trade secrets). We will inform you accordingly where applicable.

If you do not agree with the way we handle your rights or with our data protection practices, please let us (Section 2) know. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country.

## 12. Do we use online tracking?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website, and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration

data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers ) that assign a specific identification number to you or your browser (so-called «cookie»).

Cookies are individual codes (for example a serial number) that our server or a server of our service providers or advertising partners transmits to your system when you connect to our website, and that your system (browser, cell phone) accepts and stores until the set expiration time. Your system transmits these codes to our server or the third-party server with each additional access. That way, you are recognized even if your identity is unknown.

We use these technologies on our website and may allow certain third parties to do so as well. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies such as fingerprinting):

- **Necessary cookies:** Some cookies are necessary for the functioning of the website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to 24 months.
- **Performance cookies:** In order to optimize our website and related offers and to better adapt them to the needs of the users, we use cookies to record and analyze the use of our website, potentially beyond one session. We use third-party analytics services for this purpose. We have listed them below. Performance cookies also have an expiration date of up to 24 months. Details can be found on the websites of the third-party providers.

We may also integrate additional third-party offers on our website, in particular from social media providers. These offers are deactivated by default. As soon as you activate them (for example by clicking a button), these providers can determine that you are using our website. If you have an account with that social media provider, it can assign this

information to you and thereby track your use of online offers. These social media providers process this data as separate controllers.

We currently use offers from the following service providers and advertising partners (where they use data from you or cookies set on your computer for advertising purposes):

- Google Analytics: Google Ireland Ltd. (located in Ireland) is the provider of the service «Google Analytics» and acts as our processor. Google Ireland relies on Google LLC (located in the United States) as its sub-processor (both «Google»). Google collects information about the behavior of visitors to our website (duration, page views, geographic region of access, etc.) through performance cookies (see above) and on this basis creates reports for us about the use of our website. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and then cannot be traced back. We have turned off the «Data sharing» option and the «Signals option». Although we can assume that the information we share with Google is not personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. In any event, if you consent to the use of Google Analytics, you expressly consent to any such processing, including the transfer of your personal data (in particular website and app usage, device information and unique IDs) to the United States and other countries. Information about data protection with Google Analytics can be found here [<https://support.google.com/analytics/answer/6004245>] and if you have a Google account, you can find more details about Google's processing here [<https://policies.google.com/technologies/partner-sites?hl=en>].

### **13. What data do we process on our social network pages?**

We may operate pages and other online presences («fan pages», «channels», «profiles», etc.) on social networks and other platforms operated by third parties and collect the data about you described in Section 3 and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms analyze your use of our online presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

We process this data for the purposes set out in Section 4, in particular for communication, for marketing purposes (including advertising on these platforms, see

Section 12) and for market research. You will find information about the applicable legal basis in Section 5. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use (for example inappropriate comments).

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subjects rights and how you can exercise them or obtain further information. We currently use the following platforms: LinkedIn

#### **14. Can we update this Privacy Notice ?**

This Privacy Notice is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: **April 1, 2025**