

Optimal Computing SPRL

Privacy Policy

(LAST UPDATED: **17 April 2020**)

1. Purpose of this policy

1.1 Information

This policy informs You (in your capacity of data subject) about our processing of your data, in our capacity of Controller, in compliance with all applicable personal data protection and privacy laws and regulations, including the "GDPR" - General Data Protection Regulation (EU) 2016/679 (hereunder referred to as the "Data Protection Law"), and, more particularly, pursuant to article 13 and 14 of the GDPR.

The purpose of this policy is also to inform you about your rights as regards the processing of your personal data.

1.2 Informed consent

In some cases (specified below), the legal basis of our processing is your informed consent. In such cases, this policy's other purpose is to provide you with the necessary information to get a valid consent from you.

Where our personal data processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. To withdraw your consent, you are invited to use the easy opt out mechanisms that are provided in our communication tools or to send us an email (at the address indicated below).

Where our personal data processing is based on your consent, it is our duty to be able to demonstrate that you consented to the processing of your personal data. Therefore, we keep data as regards pertaining to your consent as long as we have the obligation to demonstrate our full compliance with Data Protection Laws.

If you are less than 16 years old, it is our duty make reasonable efforts to verify in such cases that consent is given or authorized by the holder of parental responsibility over the child, taking into consideration available technology. This explains why we may ask further information on such holder of parental responsibility.

2. Information on the data controller

Controller’s Identity: Optimal Computing SPRL, incorporated under Belgian law, with registered address at Rue de la Vignette(O) 36, 7034 Mons, registered with the Belgian Commercial Register (BCE) under n° 0898.325.413, and with email address info@optimalcomputing.be (hereafter referred to as “Optimal Computing SPRL” or “we”).

3. Information on the different personal data processing activities

In this section 3 we provide information on:

- the **purposes** of the processing for which the personal data are intended (why do we process your data);
- the **legal basis** for the processing (and, if applicable, the legitimate interest pursued by us or by a third party);
- the **categories of personal data** concerned (which personal data do we process);
- the **sources** of your personal data;
- the **recipients** or categories of recipients of the personal data, which are third parties as regards Optimal Computing SPRL, and to whom we transmit the personal data, if any;
- the **period** for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- where applicable, the personal data transfers to recipients in **countries outside EU** or to international organizations, and the safeguards provided by the controller in such case;

In order to be as transparent and clear as possible, this information is presented in the table below, and is provided per category of data subject:

<p>Management of this website</p>	<p>Categories of persons concerned: any visitor of our website (including you, as you are currently consulting this policy on our website)</p> <p>Purpose: ensure a good connection with our website, and secure the website and the infrastructure used to put it online</p> <p>Legal basis : GDPR, art. 6, §1 f) (legitimate interest : securing the website)</p> <p>Data categories : electronic identifiers (IP address) and connection data (logs), information that tells us how you interact with our Web site, including the browser you're using, location, cookies or other unique IDs, the pages you visit and features you use.</p>
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	<p>Sources: Data subjects (internet connections and website)</p> <p>Recipients: /</p> <p>Transfer outside EU: /</p> <p>Retention period: as long as necessary to properly secure the website</p>
Cookies	<p>Categories of persons concerned: Internet users (Clients / Prospects / Partners)</p> <p>Purpose: Website operation, Website improvement, Analysis and statistics, Website customization</p> <p>Legal basis: GDPR, art. 6, §1 f) (legitimate interest: functioning of the website).</p> <p>Data categories: Connection data</p> <p>Sources: Data subjects (internet connections and website)</p> <p>Recipients: /</p> <p>Transfer outside EU: /</p> <p>Retention period: As long as necessary for the proper functioning of the website for its use by the Internet user concerned</p> <p>PLEASE ALSO REFER TO OUR COOKIE POLICY</p>
Customer and order management	<p>Categories of persons concerned: Customers</p> <p>Purpose: Customer and order management (order tracking and fulfillment, sales information, invoicing, after-sales service, monitoring the use of our software).</p> <p>Legal basis: GDPR, art. 6, §1 b) (execution of contractual or pre-contractual measures), GDPR, art. 6, §1 c) (execution of legal and regulatory obligations: CIR, 315§3 ; CTVA 60§4).</p> <p>Data categories: Traditional identifiers (surname, first name, address, telephone), Electronic identifiers, Customer code, Function, Language, Currency, Representative, Communications content, Commercial information, other information as regards your enterprise or company (name, type of incorporation, VAT number, address, bank data, email address, domain of activities).</p> <p>Sources: Data subjects</p>

	<p>Recipients: Data controller, public administrations in the context of legal obligations, commercial partners</p> <p>Transfer outside EU: /</p> <p>Retention period: 10 years from the end of the contract or until withdrawal of consent if no contract.</p>
Supplier management	<p>Categories of persons concerned: Suppliers</p> <p>Purpose: Supplier management (selection, order tracking, accounting and administration, quality control).</p> <p>Legal basis: GDPR, art. 6, §1 b) (execution of contractual or pre-contractual measures).</p> <p>Data categories: Traditional identifiers (surname, first name, address, telephone), Electronic identifiers, Administrative data, Content of communications.</p> <p>Sources: Individuals concerned (or their employer).</p> <p>Recipients: Data controller (purchasing department / logistics department).</p> <p>Transfer outside EU: /</p> <p>Retention period: 10 years from the end of the contract or until withdrawal of consent if no contract.</p>
Prospecting	<p>Categories of persons concerned: prospects.</p> <p>Purpose: general prospecting, company development.</p> <p>Legal basis: GDPR, art. 6, §1 f) (legitimate interest: prospecting of professional customers, development of economic activities).</p> <p>Data categories: Traditional identifiers (surname, first name, address, telephone), Electronic identifiers, Administrative data, Sectoral data, Customer code, Function, Category / Home group, Language, Currency, Financial details, Representative, Transport, Communications content, Commercial information.</p> <p>Sources: Data subjects, official databases, trade (public) databases.</p> <p>Recipients: commercial intermediaries and partners</p> <p>Transfer outside EU: /</p> <p>Retention period: 3 years.</p>

Where the provision and processing of personal data is necessary for compliance with laws or contractual obligations, your refusal to provide us with the data or your provision of false or incomplete data may result in us refusing or stopping any business relationship with you or your company.

If we process personal data for purposes other than those set out in this article, we will provide you with information about this new purpose and any other relevant information before starting the new processing.

4. Your rights as a data subject

The applicable Data Protection Law grants you some rights, on certain grounds, and subject to certain conditions, including the rights to access, correct, object to the use of, or request the deletion or portability of Personal Data, as well as to ask a restriction of processing.

Please contact us as set out in the "Who to Contact About Your Personal Data" section below with any requests to exercise your rights or if you have any questions or concerns about how we process Personal Data.

You can, in principle, exercise these rights free of charge. Please note, however, that the processing of external requests, which are found to be unfounded or excessive, may sometimes be subject to reasonable administrative fees.

Please note that some Personal Data may be exempt from access, correction, objection, deletion, restriction and/or portability rights in accordance with the applicable Data Protection Law or other laws.

5. Security

Optimal Computing SPRL will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Data you might have with us has been compromised), please immediately notify us. See the "Who to Contact About Your Personal Data" section below.

When Optimal Computing SPRL provides Personal Data to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Data.

6. Complaints

If you are not happy with our processing of your Personal Data and if you feel that contacting us could not solve the issue, the applicable Data Protection Law provides you with a right to lodge a complaint with the competent supervisory authority (more information is available on its website : <https://www.autoriteprotectiondonnees.be/>).

Autorité de Protection des Données
Rue de la Presse, 35
1000 Bruxelles (Belgique)
Tel. : +32 (0)2 274 48 00
Fax : +32 (0)2 274 48 35
Email : contact(at)apd-gba.be

7. Who to contact about your Personal Data

If you have any questions about our use of your Personal Data you can send us an e-mail at this address: info@optimalcomputing.be, or write to Optimal Computing SPRL (see address above).

8. Changes to This Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements.

To inform you of the changes, we will place updates on our website. In some cases (and when we have your address), we can also inform you per email.

Please take a look at the "LAST UPDATED" date at the top of this Privacy Policy to see when it was last revised.