



Data Privacy Policy

This policy applies to HINICIO SA. The offices of Hinicio SA are located at Rue des Palais 44, bte 71 1030 Schaerbeek Belgium, as well as its subsidiaries and representation offices outside Belgium. This policy applies to the Hinicio SA website, and generally to the communications conducted by Hinicio SA and its subsidiaries.

Confidentiality and trust are key for Hinicio and its consultancy business. Hinicio cannot and does not want to take advantage of your information contrary to your interest. Since more than ten years our economical model depends on a trust relation with all actors and clients in this industry. We protect this relation without any exception.

All documents shared with Hinicio within the context of a project are subject to strict deontology and is considered confidential.

Hinicio commits to not using any illegal source of information, nor any source that you could consider non-authorized.

Hinicio guarantees that its actions and work take place in full objectivity without any current or future conflict of interest.

Hinicio is fully involved in supporting these values and we apply a strict surveillance in the organization of our projects in the form of physical and virtual separation of projects, documents, data and personally involved.

Our team is regularly trained on these practices as well as on overall confidentiality best-practices. We also invest in hardware and software means to enforce this.

The information included in this document is the result of Hinicio's analysis and is in line with the laws and rules that apply. Hinicio cannot be held accountable in any way for the consequences or results linked to the correct or incorrect utilization of this information.

The user of this information is advised to surveil a correct usage within the laws and rules that apply within the region where he operates.

To provide you with the best level of service, Hinicio SA needs to be able to maintain and use your contact information and other information about you. We do of course ensure that your privacy will be fully respected. We commit therefore to full compliance with the European Privacy legislation and the GDPR (General Data Protection Regulation). This regulation applies from 25 May 2018 onwards.

- The official GDPR reference is: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regards to the processing of personal data and on the free movement of such data.
- You will find further information on the official website: <http://www.eugdpr.org/>
- Hinicio SA will only collect and use your personal data for specific purposes. We always limit ourselves to what is truly necessary.
- We do naturally keep contact information up-to-date to communicate with prospective clients, customers, suppliers and partners within the framework of our contractual obligations. We also use these data to further inform you about our products, solutions, services and recruitment opportunities that are in line with the agreement we already have with you.



- However, we also allow you to submit your contact information to us through the contact form on our website, through direct conversations, emailing or telephone calls or when requesting for information. Subsequently, after obtaining your explicit consent, we will make further use of this information to send you our newsletter or provide you with relevant information about our products and services.
- If you visit our website, we would like to know which of our activities interests you. That is why we work with website analytic tools. We process this data anonymously, but if you fill in a contact form or click through to the website from an e-mail we sent you, we link this information to your personal data. This enables us to do more to cater for your specific needs and improve the use and access of our website or our portal applications. We also use cookies and web beacons to achieve this. We believe that data used this way has a legitimate purpose, which does not infringe on your right to privacy. You can always prevent the placing of cookies by adjusting your browser settings, but this may mean you will lose some functionality and may not be able to use certain features. If you would like to know more about cookies, what their main purpose is and how to delete or stop them, please visit the following website: www.aboutcookies.org
- Personal data that you entrust to us as a customer, partner, supplier or stakeholder, for processing on your instruction will of course only be used by us for a clearly defined assignment. The data will never be used for any other purpose or shared with any other party without your formal agreement.
We protect all collected personal data as strictly confidential information.
- All Hinicio SA employees and partners sign a confidentiality agreement in which they undertake to maintain strict confidentiality at all times in relation to the information that they gain knowledge of, in connection with their job. For this purpose, they follow clear documented guidelines, regular training and are made aware of their responsibility on a regular basis.
- Information security is our number one priority. Hinicio SA has a highly secured ICT infrastructure. Within the network, confidential information is strictly separated from the more trivial data. Access is regulated on a need-to-know basis (each user can only use the data needed for his or her job). State-of-the-art technology is used to protect the network against attacks from outside, viruses and malware. Monitoring and logging detect possible abnormal situations or activities. Maximum availability of the infrastructure and applications is ensured. However, should a security breach be encountered that may generate an information leakage beyond our control, we undertake to inform you within a maximum period of 72 hours.
- If Hinicio SA uses external parties, partners or subcontractors for certain services absolutely required for the running of the company, they will be thoroughly screened and instructed regarding their obligations in terms of confidentiality and information security. If your information is entrusted to them, they will receive a clear assignment, they will be forced to comply with contractual confidentiality obligations and the information provided to them will only be used for the strict completion of their task.
- Your data is registered and processed with the greatest care to ensure that it is accurate and up-to-date, and we store it no longer than necessary for the intended purpose.



- The necessary control mechanisms, software-related tools and manual systems are available to monitor the quality of the data. A retention period is determined in accordance with the type of information, after which the collected data is completely and permanently deleted. Personal data is stored and processed as much as possible internally.
- Contact information are only passed on to external parties in the context of a proven partnership (for example, a commercial offer that we jointly set up with a partner and for which purpose our commercial contact information is shared with the partner) or a contractually well-defined assignment, executed under our responsibility.
- As a person involved, you always have the right to be fully informed of the data we keep about you. You have the right to retrieve, correct or completely delete these data. If you believe that Hinicio SA does not handle your personal data correctly or violates the laws and regulation in any way, you are entitled to file a complaint with the Privacy Commission.
- Any questions in relation to how we process your personal data or requests to correct, supplement or delete these data can be sent to our Data Privacy Officer by e-mail (stating your motivation) to: **office@hinicio.com** with copy by courier addressed to: Hinicio SA, Data Protection Officer, Rue des Palais 44, bte 71 1030 Brussels, Belgium. We will comply with your request within four weeks of its receipt unless this deadline cannot be met due to additional complications or unless conflicts would occur with the privacy of other persons or the disclosure of the information would be prohibited by law. In such a case, a statement will also be given to you within the four-week period.
- If you have given us permission to use your data you always retain the right to withdraw this permission at any time. If you have subscribed to receive our newsletters, there will always be an option available to easily unsubscribe.
- In certain circumstances, you can also request that we store but no longer process your data (for example, in case of a dispute or for further investigation). The GDPR also gives you the right to have your personal data transferred to another service provider. This can be applied to any personal data provided directly to us by you. We regularly update this statement to give you a correct view of our intentions and our practices, which are always adapted to comply with the regulations.

Our Data Protection Officer, who has the primary task of ensuring your rights, will answer all your questions about personal data. The officer can be contacted using the following e-mail address: **office@hinicio.com** You can count on a prompt response.

This Data Privacy Policy is dated 24/05/2018 and will be regularly updated. With this in mind, we also suggest that you occasionally read through this text again when visiting our website or using our online services.