

# Privacy Protection Policy

Version of 01.04.2018

You can browse the COM8 website without disclosing your personal data. However, certain pages may be reserved for visitors who register beforehand or provide certain personal data and information. This information and data is intended to enable us to do one or more of the following:

- respond to your request for information
- to provide you with the goods or service requested
- to keep you informed about our activities and/or new products and services.

On the other hand, COM8 can also install cookies on your computer or mobile device (smartphone, tablet, etc.). Cookies are small files that the COM8 server installs on the drive on your computer or mobile device (smartphones, tablets, etc.). Cookies can store some of your data permanently or temporarily. You can find more information about this under the title “Cookie Policy”

## **1 Our commitment to protecting your personal data**

We know that respect for the confidentiality of personal data is essential to maintain your trust and we have therefore set up procedures to protect your data against any attempt of unauthorized use or disclosure.

We have a global data protection team, as well as a network of data protection officers to ensure data security in all our business lines.

## **2 Our commitment in regard to use of your personal data**

We offer you prevention and protection solutions that are constantly updated thanks to in-depth analysis of the risks you face. To that end, we collect and use your personal data in compliance with the legislation.

We have established procedures and contractual arrangements to require all our associates, sales representatives, consultants and service providers to maintain confidentiality in regard to your data.

Our clients can entrust us with the personal data that we require in order to offer them the insurance policy they need – both at the time of the initial subscription and anytime during the life of the contract. We see ourselves as guardians of this data. In some cases, we may collaborate with other companies to offer products but only when we are sure that the products offer real improved value for our clients.

The data collected through this site or during phone conversation may include information such as your name and surname, home address, email address, telephone number, age, login details and any other identification data. COM8 will not record or process sensitive data through this site. In this context, “Sensitive data” means personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and processing genetic or biometric data for the purpose of uniquely identifying a natural person, health data or data relating to the sex life or sexual orientation of a natural person.

## **3 Purpose of data processing – Voluntary nature**

Communication of your personal data through this site is done for the purpose of advertising and promoting the products and services offered by COM8, market research, statistical and actuarial studies, client management and, where appropriate, the proposal, negotiation, conclusion and execution of telecom contracts and services offered by COM8.

Communication of your personal data is on a voluntary basis where it concerns advertising and promotion of the products and services offered by COM8, market research, statistical and actuarial studies and client management.

Communication of your personal data such as your identity home address, e-mail address, personal status, your bank account and in case of medical assistance, health data, etc., is however a necessary precondition for proposal, negotiation, conclusion and execution of contracts and insurance policies offered by COM8. In the latter case, registration and processing of your personal data is covered by the applicable COM8 terms and conditions.

#### **4 Data recipients**

In order to best meet your needs and to offer you the most appropriate services in relation to the aforementioned purposes, your personal data may be communicated to other COM8 Group companies and other companies and/or individuals in a relationship with them (lawyers, medical consultants, experts, reinsurers, co-insurers, service providers, etc.) and/or your intermediaries (agents or brokers, etc.).

#### **5 Transfer of data outside the European Union**

Where appropriate, the third parties with whom we share your personal data may be located both in the European Union and outside of it. In the event of data transfers to third parties outside the European Union, COM8 complies with the legal and regulatory provisions in force regarding such transfers and, in particular, ensures an adequate level of protection for the personal data thus transferred, on the basis of the solutions imposed or recommended by the European Commission, such as the standard contractual clauses.

#### **6 Data processing for direct marketing purposes**

COM8 may process your personal data for direct marketing purposes (commercial actions, personalized advertising, profiling, data linkage, brand awareness, etc.), with the aim to improve the knowledge about you and your needs, to inform you of its activities, products and services, and to send you commercial offers. We may also share your data with other companies and intermediaries of COM8 for direct marketing with similar purposes.

In order to provide the most appropriate services regarding direct marketing, such personal data may be communicated to companies and/or persons acting as subcontractors or service providers working on behalf of COM8, other companies or intermediaries of COM8.

These processes are necessary for legitimate COM8 interests that are consistent parts of development of its economic activity. Where appropriate, these processes may rely on consent from the person concerned.

#### **7 Data retention period**

COM8 may store and process your personal login details for a period of 12 months. This retention period starts from the date of the last log in. It also applies to personal data stored in cookies.

Other data processed in the context of the purposes defined in other documents, contractual or otherwise, may be kept for different periods.

#### **8 Confidentiality**

COM8 has taken all necessary measures to protect the confidentiality of personal data and to guard against unauthorized access, misuse, modification or deletion. To this end, COM8 follows the standards of security and continuity of service, and regularly assesses the level of security of its processes, systems and applications as well as those of its partners.

## **9 Right of access, rectification, deletion, limitation and opposition – data portability**

You have the right to :

- obtain from COM8, confirmation that personal data about you are or are not being processed and, if so, when they are, and to access this data;
- correct the data and, where appropriate, have your personal data completed if it is inaccurate or incomplete;
- delete personal data in certain circumstances;
- impose limitations, in certain circumstances, on processing data that is of a personal nature;
- oppose, for reasons relating to the particular situation, personal data processing based on the legitimate interests of COM8;
- oppose the treatment of your personal data for direct marketing purposes, including profiling for direct marketing purposes;
- opt for exclusion from being the subject of a decision based exclusively on automated processing, including profiling, which produces legal effects that concern you or significantly affect you. However, if the automated process is necessary for the conclusion or the performance of a contract, you have the right to human intervention from COM8, to express your point of view and to challenge the decision made by COM8;
- receive personal data that you have provided to COM8 in a structured, commonly used, machine-readable format; to transmit this data to another person or institution responsible for processing it in cases when (i) processing your personal data relies on your consent or for the purposes of executing a contract and (ii) the processing is carried out with the aid of an automated process; and to have your personal data transmitted directly from one responsible person or institution to another where technically possible;
- withdraw your consent at any time, without prejudice to lawful processing prior to the withdrawal of said consent, when processing your personal data relies on your consent.

### Submitting a complaint

If you believe that COM8 does not comply with the relevant regulations, please contact COM8 and inform us first.

You can also lodge a complaint with the Belgian Personal Data Protection Authority at the following address:

Rue de la Presse, 35

1000 Brussels

Tel: + 32 2 274 48 00

Fax: + 32 2 274 48 35

[commission@privacycommission.be](mailto:commission@privacycommission.be)

You can also file a complaint with the Court of First Instance in your home area.

## **10 Cookie Policy**

During your visit to this website, COM8 uses cookies to improve the use of the site for visitors (for example by retaining the choice of language) and to compile statistics relating to visitors' browsing behaviour on our website.

“Cookies” are small files stored on your hard drive or on your mobile device that allow us to record certain information about your visit, which we can then read during subsequent visits. They allow browser recognition during your visit to our website (‘session cookie’) or during future, repeat visits (‘permanent cookie’). A notable example is that an installed cookie will save you having to reintroduce your language preferences (choice of the navigation language).

The COM8 server can only read the cookies that it has placed itself; it does not have access to other information on your computer or on your mobile device. Cookies are stored on your computer or mobile device in your browser directory. The content of a cookie typically consists of the name of the server that placed the cookie, an expiry date, and a unique encrypted code.

The shelf life of this information is 12 months.

You may block installation of “cookies” on your computer or mobile device by configuring your browser (please refer your browser’s online help). You can also delete cookies stored on your computer or mobile device.