

INTERNAL PRIVACY POLICY DUVEL MOORTGAT

1. INTRODUCTION

The Belgian company DUVEL MOORTGAT (hereinafter referred to as "**Duvel**") collects and processes personal information (hereinafter referred to as "**personal data**").

Duvel has always been concerned about the protection of this personal data. Therefore, Duvel is committed to complying with all applicable laws and regulations regarding data protection and privacy, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, the "**GDPR**").

This policy applies to Duvel's processing of the personal data of its personnel (hereinafter, referred to as the "**data subjects**"). The purpose of this policy is to provide the data subjects with information about this processing and about their rights.

2. CONTROLLER

Duvel, with registered office at 2870 Puurs, Breendonkdorp 58, registered in the register of legal persons in Antwerp, Mechelen department, under company number 0400.764.903, is the controller within the meaning of the GDPR.

3. CATEGORIES OF PERSONAL DATA CONCERNED

The categories of personal data that may be processed by Duvel are the following:

Category	Non exhaustive list of examples
Identification and contact information	name, first name, sex, nationality, date of birth, languages, postal address, email address, telephone number, photos, video images, ...
Information on the educational background	diplomas, certificates, training, ...
Information about the career	function, professional experience, professional achievements, professional anniversaries, professional mobility, evaluation, ...
Information necessary for the establishment of the pay slip	contract, remuneration, benefits in kind, vacations and absences, seniority, account number, expense accounts, ...
Information required by insurance companies	family and marital status, hospitalization, disability, accident, claim, ...
Information on supplies, equipment, vehicles and payment cards	date of granting, driver's license, mileage, road traffic offences, internet usage data, phone usage data, mailbox, ...

Information on social activities within the company	photos, participation, ...
--	----------------------------

Duvel only processes personal data that are adequate, relevant and necessary for the purposes for which they are processed and ensures that these are accurate and, if necessary, updated.

The personal data have been provided by the data subjects themselves or by another controller (e.g. interim agency), or collected on the company's premises and/or during events organized by Duvel

4. PURPOSES AND LEGAL BASIS

The processing of personal data serves different legitimate purposes listed in the table below, which specifies the legal basis for each of these purposes.

Categories of personal data	Purpose	Legal basis
Identification and contact information ; information about the educational background and the career	Management of personal files	Legitimate interest
Identification and contact information ; information necessary for the establishment of the pay slip	Completion of administrative formalities imposed by social and fiscal legislation	Legal obligation
Identification and contact information ; information necessary for the establishment of the pay slip	Compensation administration	Contractual obligation
Identification and contact information ; information about the educational background and the career	Work organization (incl. organization chart and announcement of arrivals/departures)	Legitimate interest
Identification information ; information about the career ; information on social activities	Social cohesion within the company (including professional anniversaries and newsletters)	Legitimate interest
Identification and contact information ; information about the educational background and the career	Personnel evaluation	Legitimate interest
Identification and contact information ; information about the educational background and the career	Management of trainings	Legitimate interest
Identification and contact information ; information about the career	Management of professional mobility	Contractual obligation
Identification and contact information; information on supplies, equipment, vehicles and payment cards	Management of individual allocations of supplies, equipment, vehicles and payment cards	Contractual obligation
Identification and contact information; information on supplies, equipment, vehicles and payment cards	Compliance with work regulations (incl. car policy)	Legitimate interest

Identification and contact information, information required by insurance companies	Management of insurance contracts	Contractual obligation
Identification information (video images ¹)	Security of the company's buildings and assets	Legitimate interest
Identification information (video images)	Safety and health of workers	Legitimate interest
Identification information (video images)	Control of the production process and the work of the workers	Legitimate interest

5. CATEGORIES OF RECIPIENTS

Personal data may be communicated for processing purposes, on behalf and under the instructions of Duvel, to external parties acting as subcontractors (e.g. G4S, SD Worx, Spencer, Workday, ...). Duvel also requires them to comply with all applicable laws and regulations concerning data protection and privacy, including GDPR. An agreement is systematically concluded between Duvel and each subcontractor for this purpose.

Personal data may also be communicated for processing purposes to external parties acting as independent data controllers. This can be public institutions to which Duvel is obliged to communicate certain information following legal and fiscal obligations (e.g. ONSS, SPF Finances, ...); but also private parties to whom Duvel may communicate certain information, notably to respect its contractual obligations (e.g. Edenred, Ethias, Proximus, leasing companies, ...).

Finally, personal data may be communicated to third parties who do not process the data, such as the company's personnel to whom certain information (e.g. the company's organization chart) is shared, notably for the purpose of organizing the work internally.

6. SECURITY OF THE PROCESSING

Duvel takes the appropriate technical or organizational measures to guarantee adequate security of the personal data and to protect them against unauthorized or unlawful processing, as well as against unintentional loss, destruction and damage. The subcontractors that Duvel uses for the processing of personal data have sufficient guarantees for the implementation of these measures.

7. PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

Duvel keeps the personal data for a period not exceeding that which is necessary for each purpose.

The personal data are kept at least for the duration of the work contract, and at most 10 years afterwards, insofar as this is necessary for the continuity of the company, for accounting purposes, and/or in the context of a possible legal claim.

¹See the policy on camera surveillance annexed to the work regulations.

8. RIGHTS OF DATA SUBJECTS

Data subjects have the right, under the conditions indicated in the GDPR, to:

- ask Duvel for access to, correction or deletion of their personal data, or to limit the processing of their personal data;
- receive the personal data concerning them in a structured, commonly used and machine-readable format;
- transfer these data to another controller without Duvel hindering this;
- object to the processing of their personal data;
- lodge a complaint with a supervisory authority if they consider that the processing of their personal data constitutes a breach of the GDPR.

9. QUESTIONS ?

If you have any questions about this privacy policy or your rights, please send an email to dataprotection@duvel.com

Last update: February 2023