

PRIVACY POLICY

0. Introduction

This privacy policy is applicable on

- 🌱 **Ciboris vzw**, established in 9052 Zwijnaarde, Technologiepark 2/3, Belgium, with enterprise number 0472 818 184 (hereafter to be called: "Ciboris", "we", "us")

Your privacy is important for us and we give great importance to a correct processing of the personal data of clients, prospects, suppliers, visitors, collaborators...

The confidentiality, adequacy and careful treatment, processing, management and safety management of personal data is of the greatest importance for our organization and are developed according to the General Data Protection Regulations (GDPR). You can always contact us in relation with this per e-mail at info@ciboris.org.

- 🌱 This declaration of privacy can be modified at any time as a consequence of legal modifications or modifications of the functionality for which this policy is valid.
- 🌱 Modifications are explicitly mentioned on our website www.ciboris.org and after any change, the version number of this privacy policy is modified. The version number is to be found in the footer of this document. Therefore, we advise you to regularly check the declaration of privacy of Ciboris on the website.

1. When is this declaration of privacy applicable?

This declaration of privacy is in vigour for the processing of personal data which we obtain from institutions, when subscribing to trainings organized by Ciboris, when performing/requesting a project with/to Ciboris or through commercial contacts with clients, prospects, leads and/or other stakeholders of Ciboris.

2. Who is responsible for the processing of your personal data?

a. Responsible of processing

Ciboris is responsible for the processing of your personal data. This means that Ciboris establishes for which purposes your personal data are stored and processed.

b. Processor of your personal data

Any external subcontractor appointed by Ciboris to process personal data, is considered as processor and not as processing responsible. They work in agreement with GDPR norms.

3. Which personal data do we process

a. Data provided by yourself

We receive your personal data amongst others when you announce them to us through:

- 🌱 Project-request via email
- 🌱 Inscription to trainings organized by Ciboris

Contact with Ciboris concerning events

In the above-mentioned cases, we normally receive information such as your first name, family name, e-mail address, landline and/or mobile phone number, address data (street number, post code, municipality, country), the company you work for, gender, products or activities you are interested in, the sector in which you are active, your function, your correspondence with Ciboris and/ or other personal data.

b. Automatically gathered data

Website visit

In general, you visit each website of Ciboris anonymously.

When you visit our website, we however receive data from cookie providers concerning your activity on our website, such as the time and duration of your website visit, the hyper-links you click to visit our website and those on our website that link with other websites, your IP-address, the pages you visit, the browser you use, your geographical data such as your location and your language of preference.

Links to the website of third parties

Ciboris has no control over and does not accept any responsibility concerning your privacy for actions that are undertaken by websites of third parties. For this we refer to the privacy policy of these websites.

E-mail communication via Marketing Automation system

If you receive e-mail communication through Ciboris, which is sent by means of a professional marketing automation system, we receive the following information:

- is the e-mail communication opened or not by the addressee?
- if present, has the addressee clicked on one or several hyperlinks in the communication?
- which website pages has the addressee visited on the website?
- for which events has the addressee registered him or herself through the website?

c. Data obtained from third parties

Sometimes we receive your information from affiliated enterprises or partners. In the framework of promotions or commercial opportunities, we can collect your personal data through these affiliated enterprises or partners.

For HR purposes, we can also receive your personal information, if this matches with the profile we are searching for outstanding vacancies.

4. Quality standards for personal data processing

a. Minimum data processing

Ciboris limits itself to the gathering of strictly necessary information that allows us to be able to exercise our activities in relation with the personal data of our clients, providers and collaborators.

b. Correctness of the data

We try to register the personal data correctly and require this correctness from our subcontractors. However, whenever you might find an error in your personal data, you can communicate this through info@ciboris.org.




5. For which purposes do we process your personal data?

a. To answer your question and to inform you

We process your personal data when you ask for an offer, ask us a question, or ask us to be informed about our services, activities, events, actions, offers...

For this objective, we can keep personal data such as your name, address, e-mail address, phone number, the enterprise you are linked with, your e-mail or contacting history, preferred language, activities you are interested in, product groups where you are active.

These personal data are processed based on:

-  Your explicit agreement wherever necessary
-  The execution of a contract where you are one of the parties
-  Your request for the realisation of actions before entering into a contract.





If in the past you have asked for an offer or have had any contact with our collaborators, we will keep you informed about our activities, unless you haven't given your permission to do so. If afterwards you do no longer want to receive this information, you can unsubscribe through the unsubscription button which you find underneath the e-mail or you can request this through info@ciboris.org.

b. To answer questions and to interchange information

If you ask us a question through e-mail or the phone, we will process your data to be able to answer your request.

For this purpose, we can process the personal data such as your name, the name of your enterprise, your function, your e-mail address, your phone number, your correspondence with Ciboris and all the other personal data that are necessary for us to be able to express an answer to your request.

These personal data are processed based on:

-  Your request to undertake steps before you confirm a service of Ciboris.
-  The execution of a contract where you are an involved party
-  The justified interest of Ciboris to inform you about its activities
-  Information obtained in previous analysis requests

e. To continuously optimise our website and to fine-tune with your preferences

We process personal data to continuously improve our website, to personalise it and to adjust it to the preferences of our clients. User-friendliness is central in our functioning and this is also applicable on the user-friendliness of our website for our clients.

For this purpose, we can process data such as your IP-address, the web pages you visit, the browser you use, your geographical data such as your location, your language of preference and the time and duration of your visit.

These personal data are processed based on the justified interest of Ciboris to improve its website(s) and to protect itself against cyber-attacks.

6. What is the legal basis to process your personal data?

When the processing of data, according to the GDPR-legislation, requires **your explicit agreement**, we shall also ask you for this. Here we think of the sending of general newsletters, mailings about topics we consider that might interest you, invitations for trainings... When you do not give the explicit authorisation, we will not process your personal data.

Some information must be delivered by us, **as per law**, to the authorities or other competent instances. In the execution of these legal obligations, we will also treat your personal data with the necessary protection.

The information we receive in analysis requirements, orders, contracts... is also processed by us in full respect of the GDPR legislation. Because of the **need** of processing of these personal data **to achieve our activities**, we do not have to ask you for permission in this matter. This information can also be used to achieve our **justified interests of our organisation or of third parties**, wherever necessary.

7. Who has access to your data?

Ciboris can share your personal data with enterprises that are affiliated with Ciboris. Besides, Ciboris solicits third parties to execute some activities such as website hosting.

We can share your personal data with some definite third parties:

- 🌱 Companies within the Primoris group
- 🌱 Processors who act on our behalf such as marketing & communication enterprises;
- 🌱 Business partners we achieve joint actions with (e.g. HR partners)
- 🌱 Business partners who work as service providers (e.g. External accountants)
- 🌱 IT partners who deliver technical support
- 🌱 Providers of payment services
- 🌱 Lawyers, collection agencies and external consultants: in some cases, Ciboris can communicate your personal data to lawyers, collection agencies and external consultants when this is necessary to give us advice or to defend our rights.
- 🌱 Supervising authorities in response to any legitimate request
- 🌱 Possible purchasers of Ciboris (or of a part of the enterprise) in case (a part of) the activities are taken over by a third party.

Ciboris commits itself to protect your personal data correctly and sufficiently, whenever you have questions about this or you wish more information concerning the transfer of your personal data, contact us through info@ciboris.org.

Personal data are not delivered to other parties, unless legal obligation or because of a court sentence.

8. What about links towards other websites and social media?

The website of Ciboris may contain references towards other websites. Ciboris is not responsible for the processing of personal data through these websites. This privacy policy is only applicable on the websites of Ciboris.

If you share content of the Ciboris websites through social media, this content is visible for the visitors of these social media. Ciboris is not responsible for the processing of personal data through these social media.

9. How long do we keep your personal data?

Ciboris will keep your personal data as long as necessary, to guarantee the objectives that are incorporated in this privacy policy, unless a longer storage period is required or allowed by law.








When no legal storage period is in vigour, Ciboris will keep your data at least as long as you are an active client, prospect, lead or supplier.

10. How are your personal data protected?

Ciboris strives towards the protection of your personal data through technological and structural measures, such as firewalls and secured servers where only few people have access to, through specific rights and with respect for the sensitiveness of the personal data. Besides these measures, special attention is given to the storage and processing of your personal data (such as logins), certainly in external connection.

11. What are your rights and how can you exercise them?

In relation with your personal data you are entitled:

-  To inspection, modification or erasing
-  To limitation of the processing
-  To enter objections
-  Not to approve the profiling
-  To data transferability
-  To withdrawing the approval
-  To enter a complaint with the supervising authority

Some of the above-mentioned rights have a specific objective or are submitted to special conditions or exceptions. Contact us in case of questions or specific requests concerning the processing of your personal data (info@ciboris.org).

If the processing of your personal data is based on authorisation, you also always have the right to withdraw your approval, without this compromising the legitimacy of the personal data processing before the withdrawal.

You can contact Ciboris through info@ciboris.org or by post to our address or by clicking the button "Unsubscribe" in our e-mailings.

Watch out: Ciboris cannot meet your request without a valid proof of your identity (electronic, written or exceptionally orally).

The concerned person is entitled to request, free of charge, which personal data about him are being processed. This information must be given in a concise, transparent and

understandable way. Ciboris commits itself to deliver the information as soon as possible and at least within a month. In case of complex requests, prolongation is possible, but you will be informed about this within the month. In case of unjustified or disproportionate requests (repeated requests) administrative costs may be charged or the request may be refused.

You are entitled to file a complaint with the controlling authority of your usual domicile, of your fixed working site or of the site of the alleged infringement. The Belgian Privacy Commission is the controlling authority for Belgium and must be contacted through commission@privacycommission.be.

If you have more questions or complaints concerning the processing of your personal data, about the website or e-mails of Ciboris or about this privacy policy, you can always contact us:

-  E-mail: info@ciboris.org
-  Phone: +32(0)9 330 10 10
-  Post: Ciboris vzw | Technologiepark 2/3 | 9052 Zwijnaarde (BE)