

PRIVACY POLICY

[version 1]

This is the Privacy Policy of Batopin. This Privacy Policy is intended to inform you about the processing of personal data that takes place via the Batopin website and/or online. This Privacy Policy must be read in conjunction with the Cookie Policy, which can be found [here](#).

This Privacy Policy may be modified, for example, in connection with new features on the website or to comply with new legal, contractual or administrative obligations. We therefore recommend that you regularly consult this Privacy Policy. Important changes will be announced on our website. This version of the Privacy Policy was last modified on 1 December 2020.

I. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Batopin (Belgian ATM Optimisation Initiative) is the controller for the processing of your personal data. Batopin is a limited liability company ("*naamloze vennootschap*" / "*société anonyme*") under Belgian law, whose registered office is located at Sint-Lazaruslaan 10, 1210 Sint-Joost-ten-Node and which is registered in the Crossroads Bank of Enterprises under number 0744.908.035 ("**Batopin**" or "**we**").

II. WHAT DATA DO WE PROCESS?

We process directly identifying data about you, such as your name, address, telephone number, etc., if you yourself provide us with your personal data, for example through a contact form on our website, if you subscribe to our newsletter or when you contact us directly by e-mail or telephone.

We also process certain data through cookies or other technologies on our website, such as the type of browser you use, the operating system you use, your IP address, the number of page views, whether you are a unique visitor, etc.

Certain data that we collect from you through cookies allow us to identify you as a natural person or can be linked to you, such as your IP address. These data therefore qualify as personal data, which is why our Privacy Policy applies to the processing of these data by our cookies. More information about these cookies can be found in the [cookie policy](#).

We also process certain non-directly identifying data through cookies when you visit our website, such as your browser type.

III. WHY DO WE PROCESS YOUR DATA?

A. *To keep you informed of our services and activities and for direct marketing purposes*

We process your personal data when you wish to be kept informed of our activities by subscribing to our newsletter. We also use this information to inform you about subjects that might be of interest to you.

To this end, we can process data such as your title, name, your job, your company name, your e-mail address and your preferred language.

We process this information based on your consent or based on the legitimate interest of Batopin to keep its clientele informed of its activities and services. You are free to choose to provide us with your personal data for this purpose, and you may withdraw your consent at any time (see Question VIII).

B. To answer your questions

If you ask us a question by telephone, via the contact form on the website or by e-mail, we will process your personal data in order to answer that question.

For this, we can process data such as your name, your contact information, your correspondence with Batopin, and any other personal data you provide that may be relevant to answering your question.

The processing of these data is based on the legitimate interest of Batopin in order to be able to answer the questions that are posed to us.

C. For the technical and functional management of our website, to keep statistics and to store your search preferences

We process personal data obtained through cookies for the technical and functional management of our website, to make our website easy to use, to collect statistics (e.g. to measure the number of visitors to the website and to measure the most visited pages) and to save your search preferences. By using your data, we can check how our website is used and we can improve its content and layout. These data also allow us to adequately secure our website.

For this purpose, we can process data such as your IP address, the pages you visit, the browser you are using, your language preference and the time and duration of your visit.

The processing of these data is based on your consent (via our cookie banner) or on the legitimate interest of Batopin in providing a well-functioning and secure website and in providing pages with content relevant to you.

For more information on the use of cookies by Batopin, see our [Cookie Policy](#).

IV. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Batopin engages third parties to perform certain (processing) activities such as hosting the website (via Amazon Web Services) and organising mailing campaigns (SendInBlue). Batopin concludes a data processing agreement with the parties that have access to personal data for the performance of their services.

V. HOW DO WE PROTECT YOUR PERSONAL DATA AND HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Batopin takes appropriate organisational and technical measures, taking into account the state of the art, the nature of processing and the potential risks, to protect your personal data in the best way possible from destruction, loss, modification or any other unauthorised processing.

Batopin does not store your personal data longer than necessary for the purposes for which they are processed, taking into account the legal retention obligations.

For example, your personal data processed for the purpose of keeping you informed of our services and activities and for direct marketing purposes will only be stored until you no longer wish to receive our newsletter (and thus withdraw your consent). The data processed for the technical and functional management of our website, the keeping of statistics and the storage of search preferences are stored for 26 months. The data we process to answer your questions will be stored until this contact has been ended.

VI. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

Batopin does not process your personal data itself outside the European Economic Area (EEA).

It is possible that the service providers working for Batopin process your personal data outside the EEA. In this respect, Batopin is committed to ensuring an adequate and sufficient level of protection for your data, in particular by relying on an adequacy decision under article 45 of the GDPR for the country to which data are transferred, by concluding standard contractual clauses under article 46.2 GDPR, or by any other appropriate safeguards provided for in Chapter V of the GDPR.

If you have any questions about the transfer of your personal data outside the EEA or if you want to obtain a copy of the relevant documents, you can send a dated and signed request to Batopin (cf. contact details under question Error: Reference source not found).

VII. WHAT ABOUT LINKS TO OTHER WEBSITES AND SOCIAL MEDIA (E.G. LINKEDIN, TWITTER)?

The website of Batopin can contain references (e.g. via hyperlinks, social plugins, links to social media operators) to other websites, which are offered by other companies or by social media. Batopin advises you to check the privacy policies of these other websites or social media.

Social media pages of Batopin

Batopin has pages on LinkedIn and Twitter. When you visit these pages, your data will be transmitted to the operator of the respective social network through the use of cookies. Social networks may receive information such as which websites you have currently visit and previously have da'svisited and your IP-address. When you visit these pages, it is possible that Batopin

receives aggregated data from the respective social network in the form of statistics about how our pages are viewed by social media users.

Social media sharing options

Our website allows you to share content with LinkedIn, Twitter, Facebook and Whatsapp. When using these social plugin functions (e.g. “share” button, ...), information about your usage is transmitted directly from your browser to the corresponding social network. If you are already registered with a social network while visiting our website, the operator of that social network may be able to assign the visit to your personal account through the social plugins. If you are not yet a member of a social network, it is still possible for the social networks to receive and store your IP address and information about the browser and operating system you are using through the social plugins.

If you share content from our website on the social media page directly, your personal data will be visible for the visitors of these social media. For the scope and purpose of data collection as well as the further processing and use of data by social networks and information on rights and settings to protect your privacy, we refer to the privacy policies of these social networks.

VIII. HOW CAN YOU EXERCISE YOUR RIGHTS?

You have the right to request free access to the personal data processed by Batopin, to request the correction or removal of your data or to request a restriction of the processing. You may also request the portability of your data and you may object to the processing of your personal data, without substantiation in the case of direct marketing, or substantiated in other cases.

When the processing of your personal data is based on your consent, you may withdraw your consent at any time. Withdrawal of your consent does not affect the lawfulness of the processing based on consent before withdrawal.

You can direct your dated and signed request based on the above rights to dpo@batopin.be or by mail to the above address. Batopin cannot handle your request without proof of your identity. Please note that the applicable legislation may impose conditions on exercising the above rights.

You also have the right to file a complaint with the supervisory authority, which is the Data Protection Authority (“Gegevensbeschermingsautoriteit” / “Autorité de protection des données”). It can be reached by mail at Rue de la Presse 35, 1000 Brussels, and by e-mail at the following e-mail address: contact@apd-gba.be.

IX. QUESTIONS?

If you have further questions about this website or about this Privacy Policy, you may also contact Batopin via dpo@batopin.be or the data protection officer of Batopin via klaus.schurmann@batopin.be.