

PRIVACY NOTICE

This is the Batopin Privacy Notice. The purpose of this Privacy Notice is to inform you about the processing of personal data that takes place via the Batopin website or Batopin ATMs. This Privacy Notice should be read in conjunction with our Cookie Policy, which [can be found here](#).

This Privacy Notice may be modified due, for example, to new features on the website or to comply with new legal, contractual or administrative obligations. We therefore recommend that you regularly consult this Privacy Notice. Important changes will be announced on our website. This version of the Privacy Notice was last modified on 26 November 2021.

Version number	Date	Description
1.0	26/11/2021	First publication

I. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Batopin (Belgian ATM Optimisation Initiative) is responsible for the processing of your personal data. Batopin is a public limited liability company ("*naamloze vennootschap*") organised and existing under the laws of Belgium, with registered office at boulevard Saint-Lazare 10, B-1210 Saint-Josse-ten-Noode, registered with the Crossroads Bank for Enterprises under number 0744.908.035 ("**Batopin**" or "**we**").

II. WHICH DATA DO WE PROCESS?

Batopin processes personal data about you in four ways:

- In cases where you yourself provide us with your personal data, for example if you contact us by email or our telephone helpdesk, to which reference is made on the Batopin website, at the payment terminal, if you register for the Batopin newsletter, or if you leave your details on a contact form. In this case, it concerns personal data such as name, address, telephone number, email address.
- In the cases where you use Batopin's ATMs and where Batopin processes personal data to be able to correctly carry out your transaction on the ATMs. This processing concerns data such as your bank card number, your account number, details about the date, time, location and amount of your transaction, based on your bank card number, without us identifying you personally. More detailed information about the processing of your personal data when using the Batopin ATMs can be found at the end of this document.
- We also process certain data via cookies on our website, such as the type of browser you use, the operating system you use, your IP address, the number of page visits, whether you are a unique visitor, etc. Certain information that we collect from you via cookies allows 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 to which this Privacy Policy applies. More information about these cookies can be found in the [cookie policy](#). Certain non-directly identifying data, such as your browser type, are also processed by us via cookies when you visit our website.

- By means of images from cameras aimed at the payment terminals. These images serve to safeguard your safety as a user, but also Batopin's property. You are informed of the presence of cameras by the pictogrammes attached to the ATMs, with reference to the contact details for questions or comments regarding the processing of the camera images. The camera images are kept for only a limited time. More information about the processing of the camera images can be found on the last page of this Privacy Notice.

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 use these data to inform you about matters that might be important to you or that might interest you.

For this we can process data such as your title, name, position, company name, email address and preferred language.

Batopin processes these data based on your consent or 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 permission at any time (see question VIII).

B. To answer your questions/respond to your complaints

If you ask us a question or make a complaint by email, to which reference is made on the website, or by telephone via the helpdesk, we will process your personal data in order to be able to answer that question.

For this, we can process data such as your title, name, email address, telephone number, preferred language, your correspondence with Batopin and all other personal data that you provide to us that are relevant to answering your question.

Batopin processes these data on the basis of Batopin's legitimate interest in answering the questions that are put to us.

C. For the technical and functional management of our website, keeping statistics and saving search preferences

We process personal data obtained through cookies for the technical and functional management of our website, to ensure that our website is easy to use, to collect statistics (e.g. to measure the number of visitors to the website and to determine the most visited pages) and to save your search preferences. 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.

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

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

For more information about Batopin's use of cookies, see our [Cookie Policy](#).

D. To analyse your offer

If you make an offer to us via the contact form available on the Batopin website to use a building for the installation of an ATM, we will process your personal data in order to analyse your offer.

For this we can process data such as your title, name, address, email address, telephone number, preferred language, your correspondence with Batopin and all other personal data that you provide to us that are relevant to answering your question.

Batopin processes these data based on your consent. 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).

E. To guarantee our services

When using our ATMs, the processing of personal data is necessary to be able to correctly handle your transactions. The details of the data that are processed can be found on the last page of this Privacy Notice.

The data that are mainly processed are your bank card number, your account number, the date, time and location of the transaction with your bank card, as well as the amount of your transaction.

Batopin processes these data on the basis of a contractual agreement that you have entered into with your financial institution, whereby it offers you money withdrawal and money deposit services.

F. To ensure your safety

When using payment terminals, there is a chance that people will be distracted, defrauded or even extorted. In these cases, to help the victim trace possible perpetrators, camera images are taken around the payment terminal.

These images are also used to safeguard Batopin's property.

Batopin processes these data because the processing

- is necessary to perform a task in the public interest
- is necessary to represent the legitimate interests of the controller.

IV. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Batopin calls on third parties to perform certain (processing) activities, such as hosting the website, organising mailing campaigns, processing the transactions performed at the payment terminals, the security of the payment terminals and access to the payment terminals.

Batopin concludes a 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 and the nature of the data to be protected as well as the possible risks, to optimally protect personal data against accidental or unauthorised destruction, against accidental loss and against alteration, access and any other unauthorised processing of personal data.

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.

Processed data	Purpose	Length of time saved
Title, name, position, company name, email address and preferred language	Personal data kept to keep you informed of our services and activities and for direct marketing purposes	Until unsubscribing from the newsletter.
Title, name, email address, telephone number, preferred language, your correspondence with Batopin and all other personal data that you provide to us that are relevant to answering your question	To answer your questions	18 months
IP address, the pages you visit, the browser you are using, your language preference, your location, and the time and duration of your visit	For the technical and functional management of our website, keeping statistics and saving search preferences	26 months
Title, name, email address, telephone number, preferred language, your correspondence with Batopin and all other personal data that you	To analyse your offer	18 months

provide to us that are relevant to analysing your offer.		
Your bank card number, your account number, the date, time and location of the transaction with your bank card, as well as the amount of your transaction	To guarantee our services	24 months
Camera images	To ensure your safety	1 month unless explicit reason for longer storage (ongoing investigation)

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

Batopin does not process your personal data 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 regard, Batopin has undertaken to ensure an appropriate and sufficient level of protection for your data, in particular by relying on an adequacy decision according to Article 45 GDPR for the country to which data is transferred, by concluding standard contractual clauses according to Article 46 (2) GDPR and/or by taking other appropriate safeguards in accordance with Chapter V of the GDPR.

If you have questions about the transfer of your personal data outside the EEA or if you wish to obtain a copy of the relevant documents, you can submit a dated and signed request to Batopin (cf. contact details under question IX).

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

The Batopin website may contain references (e.g. via hyperlinks, social plug-ins, links to social media operators) to other websites, which are offered by other companies or by social media. Batopin recommends that you check the privacy policies of these other websites or social media.

Batopin social media pages

Batopin has pages on LinkedIn and Twitter. When you visit these pages, your personal data will be transferred to the social media operator through the use of cookies. Social media operators may obtain information such as the websites you are currently visiting or that you visited in the past, and your IP address. When you visit these pages, Batopin may receive aggregated data from the

respective social networks in the form of statistics about how our pages are visited by the social media users.

Social media share buttons

On our website you can share content with LinkedIn and Twitter. When using these social plug-in functions (e.g. “share” button, ...), information about your use of the website is sent directly from your browser to the respective social network. If you are already registered with a social network during your visit to our website, the operator of that social network can assign the visit to your personal account via the social plug-ins. If you are not a member of a social network, it is still possible that the social networks receive and store your IP address and information about the browser and operating system you are using via the social plug-ins.

If you share content from our website directly on the social media page, your personal data will be visible to the visitors of these social media. For the scope and purpose of the data collection and the further processing and use of data by social networks and information about rights and settings to protect your privacy, please 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 have them rectified, erased or to limit the processing of your personal data. You may also request for your data to be transferred (data portability) 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 revoke this consent at any time. Revocation of your consent does not affect the legitimacy of the processing based on consent before its withdrawal.

Batopin informs you that the processing of certain personal data is necessary for the correct processing of the transactions that you carry out or wish to carry out on the payment terminals.

You can send your dated and signed request under the above rights to dpo@batopin.be or by post to the above address. Batopin cannot handle your request without proof of your identity. Note that the applicable legislation may impose conditions on exercising the above rights.

You also have the right to lodge a complaint with the supervisory authority, which is the Data Protection Authority. It can be reached by mail at rue de la Presse 35, B-1000 Brussels, and by email at the following address: contact@apd-gba.be.

IX. QUESTIONS?

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

Appendix to the Privacy Notice: more detailed overview of the processing of personal data in the context of guaranteeing the service and ensuring your security.

Process	Processed personal data
Cash withdrawal	Card number, amount of your withdrawal, the date, time and place of your cash withdrawal, your encrypted PIN number.
Cash deposit	Card number, account number, amount of your deposit, date, time and place of your cash deposit, your encrypted PIN number.
Card swallowed	Card number, the date, time and place of your transaction, your name as stated on your bank card
Camera images	Images of you as a user of the payment terminals and/or bystanders when performing a transaction at the payment terminal