batopin

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 13 May 2024.

Version number	Date	Description
1.0	26/11/2021	First publication
2.0	26/09/2022	Second publication
3.0	13/05/2024	Third 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 the cases where you provide us with your personal data yourself, for example if you contact us by email, via scanning of the QR code located near the payment terminals, via our telephone helpdesk that is referred to on the Batopin website, at the payment terminal, if you register for the Batopin newsletter, if you leave your details on a contact form, or if you apply for a job at Batopin. In this case, it mainly concerns personal data such as name, address, telephone number, email address, and any other data that you provide us (content of communication or curriculum vitae).

- 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 pictograms 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.

Depending on the case, 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 consent at any time (see question IX).

B. To answer your questions/respond to your complaints

If you contact us by email, to which reference is made on the website, by scanning the QR code located near the payment terminals where you can then fill in a form to share your feedback or register a complaint, ask a question or register a complaint by telephone via the helpdesk, we will process your personal data in order 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 IX).

E. To offer our services

When using our ATMs and services, the processing of personal data is necessary to be able to correctly handle your transactions. The details of the data that are processed per service can be found in the appendix to this Privacy Notice.

It mainly concerns 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 an agreement that you have entered into with Batopin.

F. To ensure your safety

When you use our ATMs, we process camera images from our surveillance cameras. The processing of these personal data is based on our legitimate interest in protecting our assets against unauthorised access and/or in preventing, establishing or detecting possible crimes against persons or property. Batopin complies with its obligations under the Belgian Camera Act of 21 March 2007. Thus, the surveillance cameras have been reported to the police, a pictogram has been attached at all entrances, and we have created a register of image processing activities. For more information, feel free to contact us using the contact details stated in Part IX.

G. As part of the selection and recruitment procedure

In the context of the selection and recruitment procedure, Batopin processes personal data of the candidate.

This information is necessary to assess your eligibility for the position you are applying for.

This concerns information that the applicant provides during telephone conversations, interviews and email exchanges such as the curriculum vitae including contact details (name, telephone number, email address) and place of residence of the applicant and any added photo. Possibly also relevant: the education, courses followed, internships and work experience of the applicant.

In principle, no sensitive information is requested and processed. In some cases, a declaration of good conduct and morals may be requested. This has its context in the fit and proper standards because for some positions, an approval is required by the National Bank of Belgium, which can request this declaration.

In addition, we also conduct research to determine whether the candidate has sufficient integrity, taking into account the risks associated with the tasks and functions that must be performed.

In this context, we conduct research on data that are publicly available, such as:

- Information that the candidate has made public on, for example, a website, social media

- Data processed by the Crossroads Bank for Enterprises

- Information in the press.

When you apply through your LinkedIn profile, you agree that the data from your LinkedIn profile will be processed and displayed on the application screen. This also gives you the option to change the displayed data.

Batopin processes these data because the processing is

- Necessary for the fulfilment of the legal obligation;
- Necessary for conclusion of the agreement.

H. Electronic identity card

Banks are obliged to use all possible means to prevent money laundering and terrorist financing. In this context, banks can request a confirmation or update of your personal data. Batopin makes its ATMs available to the banks with which it has concluded an agreement in order to comply with their legal obligations. In concrete terms, this means that if you use a Batopin ATM, you may be asked to have your electronic identity card read in. Batopin does not read and store the information that is read from the card and forwarded to the banks.

Batopin acts here as a data processor on behalf of the banks that use the Batopin infrastructure to request these personal data.

Batopin processes these data on the basis of a legal obligation that the financial institution has (money laundering legislation, including the Belgian Act of 18 September 2017 and the 4th Anti-Money Laundering Directive, EU Directive 2015/849).

IV. Who has access to your personal data?

On the one hand, Batopin processes these data itself, in the context of carrying out its activities.

On the other hand, Batopin calls on third parties to perform certain (processing) activities:

- IT service providers who provide technical support;
- Lawyers, insurers and external advisers: in certain cases we may transfer your personal data (including your email correspondence) to lawyers, insurers and external advisers if this is necessary to give us advice or to defend our rights;
- Supervisory authorities: in certain cases, we may transfer your personal data to the police, judicial or other authorities if we believe that we are obliged to do so under applicable laws or regulations, or on the basis of another lawful request or order;
- Possible transferees: in the event that our company or part of its activities is taken over by a third party, your data will be transferred to the transferee;
- Third parties that process the transactions on the payment terminals, ensure the security of the payment terminals and access to the payment terminals;
- Third parties that organise the mailing campaigns and host the website.

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?

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.

VI. HOW LONG DO WE KEEP YOUR 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	A. 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	B. To answer your questions/respond to your complaints	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	C. For the technical and functional management of our website, keeping statistics and saving search preferences	See the retention periods described in the cookie policy
Title, name, email address, telephone number, preferred language, your correspondence with Batopin and all other personal data that you	D. To analyse your offer	18 months

provide to us that are relevant to analysing your offer.		
[See appendix]	E. To offer our services	24 months
Camera images	F. To ensure your safety	1 month unless explicit reason for longer storage (ongoing investigation)
Title, name, telephone number, email address, language, nationality, date of birth, education, professional experience, extract from the judicial record	G. As part of the selection and recruitment procedure	1 month after the end of the job application procedure
Electronic identity card	E. Electronic identity card	Not saved, data is immediately forwarded to your bank

VII. 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 X).

VIII.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.

IX. 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.

X. 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.

Service	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
PIN modification	Card number, the date, time and place of your pin code modification and your encrypted PIN number
Camera images	Images of you as a user of the payment terminals and/or bystanders when performing a transaction at the payment terminal
Checking your balance	Card number, amount of your balance, the date, time and place when you checked your balance, your encrypted PIN number and your account number.

Electronic identity card	All data stated on the identity card, card number, date, time and place of the reading of the electronic identity card
Setting a PIN	Your encrypted PIN number, your encrypted answer to your security question, the date, time and place of setting your PIN number.