

# PRIVACY POLICY

## [www.vlc-consulting.be](http://www.vlc-consulting.be)

The website [www.vlc-consulting.be/](http://www.vlc-consulting.be) (hereinafter: the “**Website**”) is provided by:

Valeska Lefranc (hereinafter: “**We**” and “**Us**”)

Hof van Parc  11

3070 Kortenberg

Belgium

VAT BE 0754 640 697

E-mail: [info@vlc-consulting.be](mailto:info@vlc-consulting.be)

Telephone: + 32 (0)2 759 93 26

## 1 Introduction

### 1.1 General

Each person who visits the Website (hereinafter the “**Visitor**”) as well as each person who makes use of our services (hereinafter the “**Customer**”) almost inevitably discloses certain personal data. These personal data constitute information that allows Us to identify you as a natural person, whether or not we actually do so. You are identifiable as soon as it is possible to create a direct or indirect link between one or more personal data and You as a natural person. The Visitor and the Customer are hereinafter also referred to collectively as “**You / You**”.

We use and process Your personal data in accordance with the General Data Protection Regulation (“GDPR”) and other relevant legal provisions. Any reference in this Privacy Statement to the GDPR is a reference to the *Regulation 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 (General Data Protection Regulation)*.

Through this Privacy Policy you will be informed of the processing activities that We may carry out with your personal data. We reserve the right to amend this Privacy Policy at any time. Any substantial change will be clearly notified to you. We advise you to consult this document regularly.

### 1.2 What is personal data?

Personal data is, in simple terms, any information about you which makes it possible to identify you, possibly by combining such information. Personal data refers to obvious information, such as your name and contact details, as well as less obvious information, such as identification numbers, electronic location data and other online identifiers.



## 2 Contact details

Our identification and general contact details can be found in the Disclaimer which can also be found on this Website.

## 3 Which personal data is processed, and how is it used?

### 3.1 Information processing

Personal data	Processing purpose	Legal basis	Retention period(*)
<b>Account data</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Company name</li><li>• Phone number</li><li>• Email</li></ul>	<p>The source of the account data is the information you provide when creating your account.</p> <p>Account data may be processed to enable and monitor your use of our website and services.</p>	<ul style="list-style-type: none"><li>• Consent</li></ul>	<p>The data will be stored for a period of 12 months after the last login.</p>
<b>Transaction Data</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address (Billing and Shipping)</li><li>• Company name</li><li>• VAT number</li><li>• Phone number</li><li>• Email</li><li>• Card number</li><li>• Name on card</li><li>• Expiration date credit card</li><li>• Security code credit card</li></ul>	<p>The source of the transaction data is the information you provide when placing an order.</p> <p>Transaction data is processed to be able to ship your orders.</p>	<ul style="list-style-type: none"><li>• Consent</li></ul>	<p>The data will be stored for a period 12 months years after the last login.</p>

(\*)Notwithstanding the above, We may retain your personal information when necessary to comply with a legal obligation to which We are subject, or to protect your vital interests or the vital interests of another natural person..



## 3.2 Processors

A processor is someone who processes personal data at the request of or on behalf of Us. We may sometimes enter into a contract with this party to provide certain products and/or services. In other words: We make use of processors, when this is necessary for the provision of services. In this case, We will enter into a written agreement with the processor whereby the security of your personal data is guaranteed by the processor. The processor always acts according to our instructions.

We appeal to the following categories of processors:

- Companies we have engaged for ICT technical support and hosting purposes;
- Companies that we have engaged for administrative purposes (e.g. CRM system);
- Companies we have engaged for logistic purposes (e.g. order picking, delivery, etc.);

## 4 Providing your personal data to third parties

We may disclose your personal data to a partner identified on our Website for the purpose of enabling him or her to contact you in order to offer you relevant services. This partner will then act as the data controller. After contacting you, the partner provides you with its own privacy statement, which applies to the use of your personal data.

We may also disclose your personal data when necessary to comply with a legal obligation to which We are subject, or to protect your vital interests or the vital interests of another natural person.

## 5 International transfer (outside the EEA) of Your personal data

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected under the GDPR or equivalent legal standards..

We may store or transfer all or part of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states plus Norway, Iceland and Liechtenstein). These are known as "third countries" and may have less stringent data protection laws than those in the EEA. This means that We will take additional steps to ensure that your personal data is treated as securely and reliably as it is in the EEA.

We will only transfer your personal data to countries that the European Commission believes provide an adequate level of personal data protection. More information can be obtained from the European Commission.

We use specific contracts with external third parties approved by the European Commission for the transfer of personal data to third countries. These contracts guarantee the same level of personal data protection as that which would apply under the GDPR. More information can be obtained from the European Commission.



## 6 Security of Your personal data

We will take appropriate technical and organizational measures to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

## 7 Modifications

We may update this policy from time to time by publishing a new version on our website. This may be necessary, for example, if the law changes, or if We change things in a way that affects the protection of personal data. We encourage you to check this page from time to time to ensure that you are happy with any changes to this **Privacy Policy**.

## 8 Your rights

### 8.1 Guarantee of a legitimate and secure process of your personal data

Your personal data will always be processed for legitimate purposes, as set out in Article 3. They shall be collected and processed in an appropriate, relevant and proportionate manner, and kept for no longer than the period specified in Article 3.

### 8.2 Right to access

If You can prove your identity, You have the right to obtain information about the processing of Your personal data. Thus, You have the right to know the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data is transmitted, the criteria used to determine the data retention period, and the rights that You can exercise on Your personal data.

### 8.3 Right to rectification of your personal data

Inaccurate or incomplete personal data may be corrected. You can also contact Us with a request for amendment.

### 8.4 Right to erasure (or “right to be forgotten”)

You also have the right to obtain the erasure of your personal data under the following assumptions:

- Your personal data is no longer necessary for the intended purposes;
- You withdraw your consent to the processing and there is no other legal ground for processing;
- You have validly exercised your right of opposition;
- Your personal data has been illegally processed;
- Your personal data must be deleted to comply with a legal obligation.

The deletion of personal data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.

### 8.5 Right to limitation of processing

In certain cases, You have the right to request the limitation of the processing of Your personal data, especially in case of dispute as to the accuracy of the data, if the personal data is necessary in the context of legal proceedings or the time required to Us to verify that you can validly exercise Your right to erasure.



## 8.6 Right to object

You have the right to object at any time to the processing of your personal data for direct marketing purposes. We will stop processing Your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over Your right to object.

## 8.7 Right to data portability

You have the right to obtain any personal data which You have provided us in a structured, commonly used and machine readable format. At Your request, this data may be transferred to another provider unless it is technically impossible.

## 8.8 Right to withdraw your consent

You may withdraw Your consent to the processing of your personal data at any time, for example for direct marketing purposes.

## 8.9 The right to complain to the supervisory authority

If you believe that Our processing of Your personal data violates data protection laws (GDPR), You have the right to lodge a complaint with the supervisory authority:

Data Protection Authority  
Drukpersstraat 35, 1000 Brussels  
+32 (0)2 274 48 00  
[contact@apd-gba.be](mailto:contact@apd-gba.be)  
<https://www.gegevensbeschermingsautoriteit.be>

## 8.10 The right to revoke your consent

Insofar as the legal basis for Our processing of Your personal data is consent, You have the right to revoke this consent at any time. Revocation does not affect the lawfulness of the processing prior to revocation.

## 9 Updating Your personal data

Let us know if the personal information We hold about You needs to be corrected or updated.

*©2021 deJuristen - IT-law, Intellectual Property, Privacy & e-Compliance (<https://www.dejuristen.be/>). he information provided is copyrighted by law, so it may not be reproduced or communicated without the prior written consent of deJuristen ([contact@dejuristen.be](mailto:contact@dejuristen.be)). All applicable intellectual property rights are therefore retained.*

