

Privacy Policy of Choice

Version: June 2021

The Choice Platform is operated and managed by Choice NV, a limited liability company incorporated under the laws of Belgium, registered at the Crossroads Bank for Enterprises under the number 0748.659.757 and with its registered office at Jachthoorn 5, 3210 Lubbeek, Belgium or by any of its affiliates (jointly "**Choice**", "**we**" or "**us**"). Choice collects data when you ("**User**" or "**you**") use the Platform, register as a user and contact us. Amongst these data, we also collect personal data, namely any information relating to an identified or identifiable natural person ("**Personal Data**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Choice understands the importance of privacy and strives to protect it. All your Personal Data collected by Choice shall therefore be processed in accordance with the applicable privacy legislations, including the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "**General Data protection Regulation**" or "**GDPR**"), together with codes of practice, regulatory guidance and standard clauses and other related legislation resulting from the GDPR, as amended from time to time.

This privacy policy (the "**Privacy Policy**") describes the Personal Data that we collect from you and process, the purposes of such processing, the legal basis for processing your Personal Data, the retention period of these Personal Data, which third parties may access your Personal Data and your rights under the GDPR with regards to the Personal Data we process. This Privacy Policy applies to the relationship between you and Choice, together with the Terms of Use of the Platform you can consult on <http://my.choice.be/ToU>.

Please read this Privacy Policy carefully. You can also consult this Privacy Policy on our website <http://my.choice.be/privacy-policy>.

1. DATA CONTROLLER

Choice NV
Jachthoorn 5, 3210 Lubbeek, Belgium
Erwin Maes
erwin.maes@choice.be
watch.choice.be

2. THE PURPOSES OF THE PROCESSING

We collect your Personal Data for the following purposes:

- (a) to allow you to access and use the Platform;
- (b) to set up your User account and your access to your account;
- (c) to display content from external platforms.
- (d) to communicate with you and provide you with the appropriate support;
- (e) to improve, effectively present and personalise our services by using the analytical services of third parties to evaluate your use of the website, create reports on the activity, collect demographic data, analyse performance data, and collect other data on our website. These third parties use cookies and other technology to help analyse the data and to provide the data to us.

We want to guarantee a safe and lawful processing of your Personal Data, and we assure you that your Personal Data will be processed in a straightforward and lawful way. This infers that your Personal Data will only be processed for the aforementioned explicitly purposes.

3. TYPES OF DATA COLLECTED

3.1.1 When you use the Platform, we collect the following categories of data:

- (a) identification data such as your user account data (if any);
- (b) technical data such as your IP address, your operating system, the devices on which you use the Platform;
- (c) behavioural data such as the manner in which you use the Platform or the type of content you watch.

3.1.2 When you register for a User account, we collect the following categories of data:

- (a) identification data such as your email address, your name and surname, your address, your telephone number, your preferred language;
- (b) technical data such as your IP address, your operating system, your devices you use the Platform on.

3.1.3 When you contact us, we collect the following categories of data:

- (a) identification data such as you user account (if any), your email address or phone number;
- (b) the timings of your correspondence with us;
- (c) the content of your correspondence with us.

3.1.4 When you register for our newsletter, we collect the following categories of data:

- (a) identification data such as you user account (if any), your email address or phone number.

4. **LAWFUL BASIS OF PROCESSING**

We process your personal data in strict accordance with the applicable privacy legislation and on the basis of the following legal grounds:

- (a) Performance of the agreement: we need to process most of your Personal Data to deliver our services, to comply with our obligations, to communicate with you prior to entering into a Commercial User Agreement with you. For example, we need your contact details to be able to create a user account.
- (b) Legitimate interest: we sometimes need to process your Personal Data to achieve a legitimate interest. For instance, we collect your behaviour data to improve our services and the Platform.
- (c) Consent: we may also process your data if we are given express consent, e.g. when you register for a newsletter or when you agree to the use of specific cookies.]

5. **RETENTION AND DELETION**

We will only process and store your Personal Data for as long as required by the lawful basis on which they have been collected. This means that:

- (a) Personal Data collected in order to perform a contract between you and Choice will be retained until such contract has been fully performed;

- (b) Personal Data collected for the purposes of Choice's legitimate interest will be retained as long as needed to fulfil such legitimate interest;
- (c) Personal Data collected based on the User's consent can be retained for as long as such consent is not withdrawn.

We may be obliged to retain your Personal Data for a longer period to comply with a legal obligation or with an order of an authority. In any event, Choice will not retain your data longer than 10 year.

6. **YOUR RIGHTS AS DATA SUBJECT**

Under the GDPR, you are entitled to exercise your rights mentioned below. To exercise rights, please contact us by using the contact details provided in Article 0 of this Privacy Policy.

6.1.1 Right for information and access

You are always entitled to know what Personal Data we have on you, how, where and for how long they are processed. You therefore have the right to request information regarding the Personal Data that we hold and process in your respect and to access these Personal Data. We will then provide you with information and/or access to the Personal Data that is being processed and on the source of such Personal Data.

Please note that we may request you to provide us with additional information necessary to confirm your identity before accessing your request for information or access.

6.1.2 Right of rectification and right of erasure

You have the right to request us, free of charge, to rectify any inaccuracies in your Personal Data if such Personal Data would be incomplete or inaccurate.

You have the right to request us, free of charge, to erase all your Personal Data collected, stored and processed by us, without unreasonable delay.

6.1.3 Right to object to data processing

You may, at any time, withdraw the consent that you have given to Choice to the processing of your Personal Data.

We may solely use your Personal Data to contact you for direct marketing purposes if you have explicitly consented hereto. If you have consented hereto in the past, and you no longer want to receive such direct marketing through mail, you may at any time unsubscribe.

6.1.4 Right to restriction

You have the right to obtain from us the restriction of processing where: (i) you contest the accuracy of the Personal Data, (ii) the processing is unlawful and you request the restriction instead of deletion of the Personal Data, (iii) we no longer need the Personal Data but they are required for a legal claim, and (iv) you have objected to the deletion and there is a verification of whether legitimate grounds can override this request.

6.1.5 Right to Data Portability

Within the limits set forth in the GDPR, you may request the portability of your Personal Data, i.e. by obtaining that the Personal Data you have provided to Choice will be returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format.

6.1.6 Right to lodge a complaint with the competent authority

If you are not satisfied with the way we process your Personal Data, please let us know and we will investigate your concern using the above communication means. You also have the right to lodge a complaint with a supervisory authority. In Belgium, the supervisory authority is the Gegevensbeschermingsautoriteit / autorité de protection des données:

<https://www.dataprotectionauthority.be/citizen>.

7. **DISCLOSURE TO THIRD PARTIES AND TRANSFER TO THIRD COUNTRIES**

7.1 Discloser to third parties

Other than as set out in this Privacy Policy, Choice will not sell or otherwise disclose your Personal Data to third parties without obtaining your prior explicit consent, unless this is necessary for the purpose set out in this Privacy Policy or unless we are required to do so by law.

In the event of full or partial merger with, or acquisition of all or part of Choice, Choice may transfer your Personal Data to a Third Party. In such event, Choice shall impose this Third Party to use any Personal Data strictly consistent with this Privacy Policy.

We may also share Personal Data with third-party cloud providers and service providers who help us to provide, commercialise and improve the Platform and our services. We do not authorise these third-party service providers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such third-party service provider with only the Personal Data they need to perform their specific function.

In any event, such third-party service providers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. However, we cannot be held liable for any damages, whether direct or indirect, that may result from the misuse of your Personal Data by such third-party service providers.

7.2 Transfer to third countries

Depending on the circumstances, some recipients of your Personal Data may be located in non-EU countries. In such case, if this country is not recognised by the European Commission as offering an adequate level of data protection, we will put in place appropriate safeguards to protect your Personal Data in accordance with the GDPR, such as the Standard Contractual Clauses of the European Commission, if necessary with additional measures.

8. **CHANGES TO THIS PRIVACY POLICY**

Choice reserves the right to make changes to this Privacy Policy at any time at its sole discretion. You will be notified of any changes to this Privacy Policy when you visit our Platform following implementation of those changes and/or – as far as technically and legally feasible – through a notice sent via any contact information available to Choice. It is strongly recommended to check this page often, referring to the date of the last modification.