

PRIVACY POLICY

Introduction

This Website is operated by GOPA COM. S.A. (hereafter in this text often abbreviated as GOPA or "we") as described in our imprint. We place high priority on the protection of your personal data and treat your privacy in compliance with the General Data Protection Regulation (GDPR) of the European Union and the applicable national legislation on personal data protection.

This privacy policy (the "Policy") explains (i) how we process the personal information we collect about you, (ii) how you can instruct us if you prefer to limit the use of that information and (iii) what procedures we have in place to safeguard your privacy.

Terminology used in this privacy policy

Our personal data processing activities are governed by the General Data Protection Regulation (Regulation (EU) 2016/679) and the national data protection laws.

'Personal data' is any information that can be used to identify you, including your name, e-mail address, IP address, or any other data that could reveal your physical, physiological, generic, mental, economic, cultural or social identity.

According to GDPR, we are in general the 'Data Controller' of all personal data obtained by us as set out in this Policy, because we ultimately determine how your personal data will be handled by us or our sub-contractors, who would be our 'Data Processors'.

If we handle your personal data then you are a 'Data Subject'. This means you have certain rights under the GDPR in relation to how your personal data is processed, which are set out in this privacy policy.

Name and address of the data controller

The responsible controller of your personal data is

GOPA COM. S.A.

Woluwe Gate

Boulevard de la Woluwe 2

B-1150 Brussels

Belgium

info@gopacom.eu

Internet: www.gopacom.eu

For further information on the controller please refer to the imprint of this website.

Data protection officer

You as data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection. The contact data of our Data Protection Officer is:

Data Protection Officer
GOPA COM. S.A.
Woluwe Gate
Boulevard de la Woluwe 2
B-1150 Brussels
Belgium
Email: gdpr@gopacom.eu

To whom is this Privacy Policy addressed:

This policy is addressed to our prospects and clients, the visitors of our website, suppliers and business providers and other parties in contact with us.

Collecting and processing of your personal data on this website

We process the personal data that you have submitted to us via our website by contacting us on our email addresses and within the framework of the agreement which was concluded with GOPA COM or which you wish to conclude with us, such as your contact details and information relating to the contract.

Data we are collecting from you are your name, surname, email contact addresses, your professional situation or the name of your company.

The user of this website can use the general company email address or the other email addresses presented to get in contact with the respective staff. In this case we will store the personal data transmitted by this email. The data are used exclusively for processing the conversation with you (purpose) and are not transmitted to any third party.

Besides the data collected through these web forms, we store your current IP address, a few cookies, and some usage statistics in order to enhance the security and usability of this website. You can find more details on this functionality and the respective treatment of your personal data further below under the header Data collected for technical purposes.

We also process data obtained via external sources, such as external databases and commercial partners, for prospection purposes. Should you like to know which external source has handed us your personal data, please take contact with our DPO at the above-mentioned address.

Purposes and legal ground for processing your personal data

We process your personal data for the following purposes and based upon the following legal grounds:

1. With your consent (article 6, §1, a)) for, including but not limited to, the following purposes:
 - a. To handle your request when you send us an email;
 - b. To send you direct marketing communications that you gave consented to receive via email;
 - c. to send you direct marketing communications via email based on your implicit consent if you are an existing customer and we have received your email address from you. You have the ability to object to this use of your email address at any time and free of charge. You can unsubscribe easily via the added link at the bottom of any email;
 - d. to transfer your email address to a specified third party;
2. For the preparation or the performance of our services contract with you (article 6 §1, b)) for, including but not limited to, the following purposes:
 - a. To make a contract proposal, to conclude, execute and monitor the particular service contract;
 - b. to prevent and combat bad payment, and to determine, exercise and safeguard our rights in general, including but not limited to, debt collection, management of litigation and any legal proceedings;
3. For the realization of our legitimate interests, when the processing of your Personal Data is necessary for us to conduct our company activities (article 6 §1, f)) for, including but not limited to, the following purposes (except where your explicit consent is required):
 - a. To establish client or prospect segments or marketing profiles;
 - b. To optimize our services and to measure our performance;
 - c. To prevent and combat fraud, crimes and possible violations;
4. For complying with legal or regulatory provisions to which we are subject (article 6 §1, c))

Deleting personal data

We delete your personal data on a regular basis in accordance with the requirements of the GDPR.

If you have contacted us through email, we are deleting your personal data as soon as the relevant communication with you is concluded, unless (i) you have provided us with separate consent to store your personal data longer, (ii) we still need your personal data to fulfil a contractual obligation, or (iii) statutory retention obligations require us to retain your personal data for a longer period.

The session cookies stored while you were using our website will be deleted when your browsing session ends. The IP addresses logged on our server will be deleted after one month.

Rights of the data subject in terms of data protection

You have the following rights in relation to your personal data:

- Right to confirmation - you can ask us to confirm whether we are processing personal data concerning you.
- The right to be informed - this is information on the personal data we are processing and the purpose for which we are processing them.
- The right of access - you have the right to be provided with copies of your personal data that we are processing.
- The right to rectification - if you think the personal data that we hold on you is inaccurate or incomplete you can request us to correct this.
- The right to erasure - if you want us to delete the personal data we are holding for you then you can request us to do so.
- The right to restrict processing - if you oppose the way how we are processing your personal data then you have the right to inform us accordingly and we will restrict the processing on the basis of your right.
- The right to data portability - if you want us to forward your personal data to a different organisation or person then you have the right to inform us and we will transfer your personal data respectively (without adversely affecting the rights of others).
- The right to withdraw your consent - you can withdraw your previously given consent to the processing of your personal data at any time by contacting us using the contact form provided.

If you want to exercise one or more of these rights, please contact our Data Protection Officer at the following email address: gdpr@gopacom.eu. You can request your rights free of charge unless your request is clearly unfounded, repetitive or excessive. Alternatively, in these circumstances we may refuse to comply with your request. In accordance with the GDPR, we will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

In addition to the above rights, as a data subject you have the right to lodge a complaint with your local data protection authority within the European Union. Please note that you can use whichever local data protection authority within the EEA that is most convenient for you.

Transfer of personal data

Your personal data may be transferred to our suppliers, subcontractors and business providers, who provide services that include data processed on our behalf.

These parties can solely process your personal data in order to carry out their mission and within the limits of our instructions.

When our suppliers and subcontractors are located in countries outside the European Economic Area, GOPA COM will make sure that appropriate safeguards and security measures to guarantee the security and confidentiality of your personal data are put in place.

If you contact our staff during their potential business trips outside the EU, the staff is receiving your email through a secure connection, so that your data is not transmitted to a third party, but remains within the sphere of influence of our company.

If we are forwarding or copying a message that we have received by email to persons outside our company, we will first ask you for your consent to do so, unless you have informed us explicitly about your consent already when you were writing your email to us.

Security measures:

In order to protect your personal data against loss, destruction and against unauthorized access or manipulation, GOPA COM has taken both technical and organizational security measures.

This means, on the one hand, that our IT-system is equipped with back-up, filtering and firewall systems, in accordance with the adequate industry security standards and, on the other hand, that our employees have been made aware of the risks relating to data breaches and trained to correctly deal with your personal data, and that access to your personal data is solely granted to those persons who are authorized to do so in order to perform their duties.

If you contact our staff during their potential business trips outside the EU, the staff is receiving your email through a secure connection, so that your data is not transmitted to a third party, but remains within the sphere of influence of our company.

If we are forwarding or copying a message that we have received by email to persons outside our company, we will first ask you for your consent to do so, unless you have informed us explicitly about your consent already when you were writing your email to us.

Automated decision making and profiling

As a responsible company, we neither use automatic decision-making nor profiling.

Data collected for technical purposes

a) Cookies

Data protection with regard to web services used on this website

Google Analytics

We are using the web analytics service Google Analytics on our website. The purpose of the Google Analytics component is to analyse the traffic on our website and to use this information for improving the usability of our website. Legal basis for using Google Analytics is Art. 6 Abs. 1 lit. a GDPR. The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States of America (USA). Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us. This includes, inter alia, data about the website from which a visitor has come, which sub-pages of our website are visited, or how often and for what duration a sub-page is viewed. Google Analytics is using a cookie that enables Google to analyse the use of our website. The cookie is used to store personal information, such as your access time and the frequency of your visits to our website. With each visit to our Internet site, such data will be transmitted to Google in the United States of America where they are stored by Google. Google may pass these personal data collected to third parties.

You may prevent the setting of the Google Analytics cookie by our website at any time by means of a corresponding setting in your Internet browser and, thus, permanently deny the setting of this cookie. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, you have the possibility of objecting to the collection of data generated by Google Analytics in relation to the use of this website, as well as the processing of this data by Google. For this purpose, you would have to download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics.

Further information and the applicable data protection provisions of Google may be found at <https://www.google.com/intl/en/policies/privacy/>

and

<http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained here: <https://www.google.com/analytics/>.

Changes to this Policy

As and when necessary, changes to this privacy policy will be published on our website. Where changes are significant, we may also email you and where required by law, we will obtain your consent to these changes.