

# Privacy Statement Immo-Connect

## 1. General:

Immo-Connect is an access platform, where a user creates an account in order to access various applications developed by "Open Real Estate Information Services" (hereinafter: ORIS NV).

Immo-Connect was developed by ORIS NV, with registered office at Kortrijksesteenweg 1005, 9000 Gent Belgium with company number 0866.381.630, e-mail address: [privacy@orisnv.be](mailto:privacy@orisnv.be), telephone number +32 (0)9 243.10.23.

\* \* \*

This privacy policy explains how Immo-Connect handles the personal data of natural persons who are in contact with Immo-Connect. By means of this Privacy Statement, we inform you about the way in which we process your personal data as soon as you create an Immo-Connect account (via the website <https://www.immo-connect.be> or the Immo-Connect linked tools).

Personal data is any form of information that allows you to identify yourself directly or indirectly as a natural person.

Immo-Connect attaches great importance to the protection of your personal data and fully respects your privacy. Immo-Connect treats and protects your personal data in a lawful, proper and transparent manner.

When processing your personal data, Immo-Connect clearly complies with the law, i.e. European Regulation No 2016/679 of 27 April 2016 on data protection (better known as 'GDPR') or any other legislative act amending it.

More information about the protection of personal data can be obtained from the Data Protection Authority.

We invite you to read this statement carefully so that you know and understand the Immo-Connect policies in this area.

This declaration will be regularly updated. The most recent version of the statement is available on the Immo-Connect website. We will inform you through the usual communication channels if significant changes have been made.

By accepting this Privacy Statement during the registration process, you agree with its contents. If you do not agree with one or more conditions, please do not register for the time being and contact us first at [privacy@orisnv.be](mailto:privacy@orisnv.be) to discuss your concerns.

This Privacy Statement accompanies the terms of use that apply to Immo-Connect. We advise you to read both documents carefully.

## 2. Who is the controller?

Oris NV is responsible for the processing of your data.

ORIS NV is therefore your interlocutor and is the one who must answer to the Data Protection Authority regarding the processing of your personal data.

ORIS NV determines the purposes for which your personal data are processed as well as the means used and the processing characteristics.

## 3. What personal data are processed?

Below is an overview of the categories of personal data that Immo-Connect may process. Other data may also be processed if they prove necessary or useful for the continuation of your relationship with Immo-Connect. This is therefore a non-exhaustive overview.

- Identity details of the user: surname, first name, address (correspondence address, domicile address), user name, e-mail address, telephone number, mobile phone number, fax number, national register number, CBE number.
- Recognition data of the user: membership of several organizations.
- Social media.

Immo-Connect does not process data that reveals your racial or ethnic origin, or political opinions, religious or philosophical beliefs, trade union membership, health or life data or sexual orientation, genetic data or biometric data.

## 4. For what purposes does Immo-Connect process your personal data?

Immo-Connect collects and processes your personal data solely for the purposes set out below.

Immo-Connect ensures that only the necessary and relevant data for a certain purpose are processed.

Immo-Connect processes your data in the situations permitted by law:

- In order to comply with the legal obligations incumbent on Immo-Connect.
- To carry out a contract with you or to take certain measures at your request prior to the conclusion of this contract.
- For the protection of the legitimate interests of Immo-Connect balancing these interests with your fundamental rights and freedoms.
- In specific cases, with your consent, as a result of a specific and unambiguous request, preceded by clear and comprehensible information; this consent may be withdrawn by you at any time in accordance with the law.

### 1. Legal requirements:

Immo-Connect must comply with legislation that obliges it or one of its applications in specific circumstances to process your personal data in the context of its activities.

These obligations may require Immo-Connect to cooperate with the competent authorities and/or third parties, and possibly transfer some of your personal data to them.

## **2. Execution of an agreement - providing access to various applications:**

You enter into an agreement with Immo-Connect in order to gain access to various tools. In order to be able to execute this agreement, Immo-Connect must process your personal data.

## **3. The legitimate interests of Immo-Connect:**

Immo-Connect also processes your data for the fulfilment of its legitimate interests.

In doing so, Immo-Connect strives to strike a fair balance between the need to process data and respect for your rights and freedoms, including the protection of privacy.

Personal data is processed in order to personalize the services provided by Immo-Connect, to improve the quality of the services provided to you, to evaluate and improve processes and products.

## **4. Specific justified interest of Immo-Connect: conventional direct marketing:**

Immo-Connect carries out a customer segmentation - particularly according to your needs - in order, for example, to offer you services that correspond to your professional and personal situation. Immo-Connect can do this, among other things:

- Analyse your behaviour through various channels (visits/meetings, e-mails, visits to the website, messages via our website), derive your preferences and thereby personalise the information and the internet pages you have visited.
- Simplify the filling in of forms by already filling in certain fields with already known data and asking you to verify the accuracy of this data and to update it if necessary.
- Send you personalized recommendations.

## **5. Your consent to the processing and transmission of electronic communications (electronic direct marketing):**

Immo-Connect may process your personal electronic contact information (i.e. your mobile phone number and e-mail address) in order to send you personal information or proposals through direct marketing or newsletters. In this case, Immo-Connect must first request your specific permission.

By accepting this privacy policy, you consent to the processing of your personal data for electronic direct marketing purposes and to the sending of electronic advertisements.

## **5. To whom does Immo-Connect transfer your personal data?**

Immo-Connect treats your personal data with the utmost care and only shares your data in order to offer you the best services in the execution of its assignment.

Immo-Connect may send your data to other entities within its group at home and abroad, in particular to the other entities of the group that assist Immo-Connect in the execution, management and control of its activities, including reporting, support and computer security or the provision of specific services and products.

In some cases, Immo-Connect is required by law to share your data with third parties, including:

- Public authorities or supervisory authorities where there is a legal obligation to communicate information.
- Judicial investigative bodies at their express request.

Immo-Connect also transfers your data to specific service providers to help with :

- Designing and maintaining computer equipment and internet applications.
- Preparing reports and statistics, printing documents and designing products or services.
- The commercialization of its activities, the organization of events and the management of customer communication.

Immo-Connect also transfers your personal data to its API partners (e.g. office software providers).

Your personal data may also be disclosed to bailiffs or lawyers in the context of legal proceedings.

In the aforementioned cases, Immo-Connect ensures that third parties only have limited access to the personal data necessary to perform the required specific tasks.

Immo-Connect will also ensure that third parties will undertake the necessary steps to use and disclose the personal data in a secure and confidential manner in accordance with Immo-Connect's instructions and its data protection policy.

Immo-Connect stores your personal data within the European Economic Area (EEA). Therefore, no data will be transferred to countries outside the EEA.

## 6. How long will your personal data be stored?

Immo-Connect will not retain your personal data longer than is necessary for the purposes for which the data are collected.

This period is linked to the legal and tax obligations of Immo-Connect as well as the legal need to keep your data outside the retention period as evidence or to respond to requests for information from the competent authority.

## 7. How are your personal data secured?

Immo-Connect applies strict standards to protect the personal data under its control against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Immo-Connect takes measures of a technical and organizational nature such as encryption, antivirus, firewalls, access controls, strict selection of employees and suppliers, to prevent and detect inappropriate access, loss or disclosure of your personal data.

In the unlikely and unfortunate event that your personal data is compromised under Immo-Connect's control due to an information security breach, Immo-Connect will act immediately to identify the cause of such breach and take action through appropriate remedial action. If necessary, Immo-Connect will notify you of this incident in accordance with applicable law.

## 8. What are your rights when processing personal data?

### 1. Right of access, rectification, limitation, erasure, transferability of data and objection.

For the purposes mentioned above, you have:

- A **right to access** your personal data at Immo-Connect. This means that you can ask Immo-Connect whether it processes your personal data, for what purposes these data are processed, what categories of data are processed and to whom they are disclosed.
- A **right of rectification** if you discover that your personal data is incorrect or incomplete.
- A **right of restriction** if, for example, you dispute the accuracy of your personal data and this for a period of time that allows Immo-Connect to verify this.
- A **right of deletion** of your personal data. Once your agreement with Immo-Connect has ended, you can ask Immo-Connect to delete your personal data if this is no longer necessary for the purposes for which these personal data were collected. You also have the option at any time to request the deletion of personal data processed by Immo-Connect on the basis of your consent (unless Immo-Connect has a different legal basis for the processing) or on the basis of the legitimate interest of Immo-Connect (unless there are overriding compelling legitimate grounds for the processing). Immo-Connect may in any case keep these personal data if this would be required for evidentiary purposes in the context of legal proceedings.
- A **right to transfer** data that you have provided to Immo-Connect if your personal data are processed on the basis of an agreement or on the basis of your consent to the sending of electronic communications and these personal data are processed using automated processes. Under this right, you can ask Immo-Connect to forward your personal data to yourself or directly to another data controller, insofar as this is technically possible for Immo-Connect.
- You have the **right to object** to the processing of your data for the purposes mentioned in article IV.3 and IV.4. However, in the case of IV.3, Immo-Connect may continue to process personal data if there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms or grounds related to the initiation, exercise or substantiation of a legal claim.

You can exercise your rights by sending a written request by post, dated, signed and accompanied by a copy of your proof of identity to ORIS NV, Kortrijksesteenweg 1005, 9000 Gent Belgium, or by e-mail to [privacy@orisnv.be](mailto:privacy@orisnv.be).

### 2. Right to oppose the sending of electronic communications:

IV.5 asked for your consent to process and use your electronic contact details to send you information and personal proposals (via direct marketing campaigns or electronic newsletters). This applies in particular to communications to your mobile phone number and e-mail address.

You have the right to object to the processing of your personal data for electronic direct marketing and to oppose the future receipt of such correspondence.

You can let us know in the following ways:

- By sending an e-mail with a copy of your identity card to [privacy@orisnv.be](mailto:privacy@orisnv.be).
- By sending a letter by post with a copy of your identity card to ORIS NV, Kortrijksesteenweg 1005, 9000 Gent Belgium.
- By clicking on the "unsubscribe" link at the bottom of an e-mail or electronic newsletter sent by Immo-Connect.

However, the exercise of the right of opposition cannot prevent Immo-Connect from contacting you for any other purpose, including a legal obligation or the performance of the contract, in accordance with this statement.

### **3. The right to complain:**

Immo-Connect makes every effort to respect your privacy. Of course, it can never be ruled out that this can be improved.

If you have any questions or complaints regarding the processing of your personal data, please contact us as follows:

- By post : ORIS NV, Kortrijksesteenweg 1005, 9000 Gent, Belgium.
- By e-mail : [privacy@orisnv.be](mailto:privacy@orisnv.be)
- By phone : +32 (0)9 243.10.23.

We ask you to identify yourself by sending us a copy of your identity card.

You can also submit a complaint to the Belgian Data Protection Authority by post at Drukpersstraat 35, 1000 Brussel Belgium, or by e-mail at [commission@privacycommission.be](mailto:commission@privacycommission.be), or by telephone at +32 2 274 48 00.

## **9. Changes:**

Immo-Connect reserves the right to change this Privacy Statement at any time. Therefore, please consult the latest version of this document on a regular basis. If you disagree with a change in the Privacy Statement, you always have the option to stop your account.

This Privacy Statement was last amended and revised on 26 February 2020.