

# Privacy Policy

## What is it about?

The processing of your personal data by the SH group and its brands is subject to the Rules of personal data protection (called RGPD or GDPR in its English version) of April 27, 2016, on the Protection of Personal Studies on Data Processing. The regulation came into force on May 24, 2016 and is applicable from May 25, 2018.

Since the beginning of our existence, we have gone to the freedom of access to the data we collect. Our goal is to continue on the path so that you continue to trust the management of your personal data with respect and you.

What personal data are we talking about?

Of those that SH Group SCS collects about you personally and the way it uses them. As such, each person working in the legal entities of SH Group SCS who collect personal data are called "data controllers" of personal data.

On our website, we also use cookies. To learn more about this, check out our Cookies Policy.

*Our privacy policy is based on the relationships that bind us with you :*

- You subscribe to a digital or physical publication: your name, first name, postal address, email address, bank details, will be collected;
- You buy a physical good, a service, as part of a coupled offer, for example: other personal financial or banking data may be added in case of bank domiciliation or recourse to a credit institution. Your personal data will then be shared with the latter who must also provide all the guarantees to protect them;
- You participate in a contest: in addition to the personal data that must identify a participant and a winner, you may be asked to consent to other purposes of using your personal data to receive other information from our website. from or from other contest organizers.

## What personal data do we hold and from which sources?

We collect and store various types of personal data about you when you create an account, buy a property or a subscription service for example, when you contact us in one or the other frame, and when you use our websites , mobile apps and our social media pages. All these sources are supplemented by the use of cookies.

More concretely :

- When you use our websites or mobile applications, we collect personal data such as the browser and device you use, your location, features used on our site / application or not.
- When you use a social networking feature on our website or apps and post them on these social networks, the social network will provide us with personal information about you;

- If we were to collect personal data about or about children, we could only validate it with parental consent.

## **Why and how do we use your personal data?**

We use your personal data for different purposes that will be systematically offered with your prior consent: receive a newsletter, subscribe to a publication, buy a physical or digital product, participate in a contest, attend a promotional event, share information, etc. But also for prospecting purposes as well as for situations where the law requires it. In a contractual context for example, depending on the nature of our service, we may include your personal data or your billing data.

More concretely :

- For the execution of a contract concluded with you, we use your personal data to process your order, obtain payment and provide you with a customer support service;
- To pursue our legitimate business interests, your personal data is necessary:
  - studies and market analyzes to improve and personalize our products and services ;
  - commercial prospecting;
  - to prevent or detect any fraud, crime or misdemeanor, or unlawful use of our networks, our physical or digital services and to ensure the safety of our operations and those of our Partners, Recipients or Subcontractors;
  - protect our intellectual property rights (brands, content, etc.) or those of our Partners, Recipients or Subcontractors;
  - to create your profile (without the use of personal data necessarily) to help us customize our services for you.

## **Do we share your personal data? With whom and why?**

SH Group SCS does not share any personal data.

However, partners who are important players in the digital world (Google, Amazon, Facebook, Apple and Microsoft, in particular) and who provide very important services to Internet users but also to businesses (audience analysis, advertising positioning, etc.) can use your personal data. In principle, these actors are obliged to respect, as we do, the European General Data Protection Regulation as well as the Privacy Shield (EU-USA Data Protection Shield). Google, Amazon, Facebook, Apple and Microsoft are also "data controllers" and therefore fully support their responsibilities and charges related to the processing of personal data. SH Group SCS will assume its own, limited to its own actions of personal data processing, within the framework of protection which it established.

## **Your consent and your rights**

The protection of your personal data requested from us is based on your consent to us to transmit them for use.

Your consent will be required, for example, to enable us to :

- to contact you by proposing you offers of products or services, by means of emails, push notifications or Web, sending SMS, or social networks;

- provide you with geolocation-based services that allow you to send live push information within a defined framework.

SH Group SCS offers to complete a profile for the use of a website or a service. In this context, it is entirely possible for you to manage your personal data yourself. Some personal data are however mandatory to communicate to us to allow a real service.

The General Rules for the Protection of Personal Data have strengthened your rights to manage your personal data. You have several rights:

- the right of access to your personal data, ie the right to obtain (i) confirmation that the data is used and (ii) the communication of the data used and that have been / will be communicated to the Recipients ;
- the right to withdraw your consent to the use of your personal data, in part or in full;
- the right to rectification or correction of erroneous or incomplete personal data;
- the right of erasure of personal data, when they are not or no longer used, in case of illegal use or withdrawal of consent;
- the right to submit a complaint to the Belgian Privacy Authority <https://www.privacycommission.be/en>;
- the right to the portability of personal data consisting of a request to transmit his personal data either to the individual himself or to another controller in order for him to provide his service;
- the right to limit the use of personal data.

To exercise one of the rights above, please make a request by email to the address **info@tag-ad.be**, making sure to complete the information necessary for the exercise of each of the rights concerned.

Although we carefully evaluate each request we receive, we must be able to:

- authenticate the requestor exactly. Process managers implement an authentication process to ensure that the requester is the person who is the subject of the request. This requirement should not be a problem when an account is needed to connect. However, in case of doubt as to the identity of the applicant, the controller must request additional information;
- Have sufficient response time. The request will be processed without undue delay and no later than one month after receipt of the request. In the case of a complex application, a two-month extension will be used;
- refuse unfounded or excessive requests. Some applications may expose the applicant to fees.

If he refuses to respond to the request, the controller will inform you of this refusal and your right to apply to the Belgian Privacy Authority.

## **Security of your information**

We constantly implement and maintain administrative, technical and physical security measures to protect your personal data against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your personal data are firewalls and encryption of data, as well as access controls to personal data.

We only keep your personal data for the time necessary to process them in order to provide you with the services you request for the purposes for which they are used, as well

as for legal purposes that require us to retain such data. We securely delete your personal data when it is no longer required for the purposes described.

### **Amendment of this Privacy Policy**

We reserve the right to modify this Privacy Policy to comply with applicable privacy laws or to adapt it to our practices. We therefore invite you to consult it regularly to see any changes. New versions will be uploaded to our website, updating the date on it. In case of substantial changes, if necessary, we will also ask for your consent for such changes.

### **How to contact us ?**

For any additional information or questions related to this Privacy Policy, our Data Protection Officer (DPO) is at your disposal by email.