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## ***Privacy Statement Summary***

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This privacy statement explains what information we gather about you, what we use that information for and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

- Who this privacy statement applies to and what it covers
- What information we collect
- How we use information about you
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- Who we disclose your information to
- Protection of your personal information
- How long we keep your information for
- Your rights
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## ***Who this privacy statement applies to and what it covers***

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This privacy statement applies to Qarad b.v.b.a. with registered office address at Ciplstraat 3, 2440 Geel, Belgium and Qarad b.v., with registered office address at Flight Forum 40, 5657 DB Eindhoven, The Netherlands (“Qarad”, “we”, “us” or “our”). Each Qarad entity is a separate and independent legal entity and this privacy statement applies to each separately and unseverally. We are committed to protecting your privacy and handling your information in an open and transparent manner.

This privacy statement sets out how we will collect, handle, store and protect information about you when:

- providing services to you or our clients;
- you use “our Website” or
- performing any other activities that form part of the operation of our business, as described in further detail below.

When we refer to “our Website” or “this Website” in this policy we mean the specific webpages with a URL commencing “<http://www.qarad.com>”.

This privacy statement also contains information about when we share your personal data with third parties (for example, our service providers).

In this privacy statement, your information is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal information as “processing” such personal information.

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## ***What information we collect***

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In the course of providing services to you or our clients and performing due diligence checks in connection with our services (or discussing possible services we might provide), we will collect or obtain personal data about you.

We may collect or obtain such data because you give it to us (for example in a form on our Website), because other people give that data to us (for example your employer or adviser, or

third-party service providers that we use to help operate our business) or because it is publicly available.

The personal data that we collect or obtain may include:

- your name;
- age;
- date of birth;
- gender;
- e-mail address;
- telephone number;
- work address;
- country of residence;
- employment details (for example, the organization you work for and/or your job title).

The types of personal data that we collect may vary depending on the nature of the services that we provide to you or our client.

Where we are provided with personal data about you by our client, we use reasonable efforts to include clauses into the contract with the client that will require them to comply with the privacy laws and regulations relevant to that information; this may include, for example, that the client has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy statement. We understand the importance of protecting children's privacy. Our Website and services are not designed for, or intentionally targeted at, children. It is not our policy to intentionally collect or store information about children.

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### ***How we use information about you***

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We will use your personal data to provide you or our client with the requested services. As part of this, we may also use your personal data in the course of correspondence relating to the services. Such correspondence may be with you, our client, our service providers or competent authorities. We may also use your personal data to conduct due diligence checks relating to the services. Because we provide a wide range of services to our clients, the way we use personal data in relation to our services also varies.

For example, we might use personal data:

- to establish and fulfil a contract with you, for example, if you enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- about a client's employees and customers in the course of conducting an audit (or similar activity) for a client;
- about a client to contact him during the performance of our services and keep them informed of the project's progress or in order to communicate them our projects' deliverables.

We may also use your personal data for the purposes of, or in connection with:

- applicable legal or regulatory requirements;
- requests and communications from competent authorities;

- administrative purposes;
- financial accounting and invoicing purposes;
- client relationship purposes, which may involve: (i) sending you thought leadership or details of our products and services that we think might be of interest to you; (ii) contacting you to receive feedback on services; and (iii) contacting you for other market or research purposes. In all above cases, we give you the opportunity to decline our offers and requests at any time. In specific cases if needed, for example in case you are not yet a client, we will make sure to obtain your prior consent before sending you communications' materials or other marketing requests (see also below, "The legal grounds we use for processing personal information").

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### ***The legal grounds we use for processing personal information***

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We are required by law to set out in this privacy statement the legal grounds on which we rely in order to process your personal data.

As a result, we use your personal data for the purposes outlined above because:

- a) of the legal and regulatory obligations that we are subject to, such as keeping records for regulatory or tax purposes or providing information to a public body or law enforcement agency;
- b) the information is required in order to provide our services to you or our client;
- c) of our legitimate interests in the effective delivery of our services to you or our client;
- d) of our legitimate interests in the effective and lawful operation of our business so long as such interests are not outweighed by your interests.

Where we are legally required to obtain your explicit consent to provide you with certain marketing materials, we will only provide you with such marketing materials where we have obtained such consent from you or when we have entered into an agreement to provide services to you.

If you do not want to continue receiving any marketing materials from us, you can click on the unsubscribe function in any such communication.

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### ***Who we disclose your information to***

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We may share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Statement;
- our suppliers, business partners and sub-contractors; and/or
- search engine and web analytics;
- competent authorities;
- other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the "How we use information about you?" section above.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers who will process it on behalf of Qarad for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance and call centre operation.

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### ***Protection of your personal information***

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We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- technological security measures, including fire walls, encryption and anti-virus software;
- physical security measures, such as staff security passes to access our premises.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

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### ***How long we keep your information for***

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We will hold your personal data on our systems for the longest of the following periods:

- (i) as long as is necessary for the relevant activity or services;
- (ii) any retention period that is required by law; or
- (iii) the end of the period in which litigation or investigations might arise in respect of the services.

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### ***Where is my data stored***

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The personal data that we collect from you is stored within the European Economic Area (“EEA”), however in some specific cases it may be transferred to, and stored outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

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### ***Your rights***

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You have various rights in relation to your personal data. In particular, you have a right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data;
- withdraw consent to our processing of your personal data (to the extent such processing is based on consent);

- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- object to our processing of your personal data.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please email [info@qarad.com](mailto:info@qarad.com) or call our office at +32(0)14 57 05 44.

You may also use these contact details if you wish to make a complaint to us relating to your privacy.

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### ***Right to complain***

If you are unhappy with the way we have handled your personal data or any privacy query or request that you have raised with us, you have a right to complain to the EU Data Protection Authority (“DPA”) in your jurisdiction. The Belgian Data Protection Authority is Qarad’s supervisory authority and can be contacted via:

**Belgian Data Protection Authority**

**Commissie voor de bescherming van de persoonlijke levenssfeer**

Rue de la Presse 35 / Drukpersstraat 35

1000 Bruxelles / 1000 Brussel

Tel. +32 2 274 48 00

e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)

Website: <http://www.privacycommission.be/>

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### ***Changes to this privacy statement***

We may modify or amend this privacy statement from time to time.

To let you know when we make changes to this privacy statement, we will amend the revision date at the top of this page. The new modified or amended privacy statement will apply from that revision date. Therefore, we encourage you to periodically review this statement to be informed about how we are protecting your information.