



This Privacy Statement applies to all personal data processed by Clinic6 SPRL, a public limited company with its registered office at Rue des Journaliers 1, 7822 Ath (Ghislenghien), Belgium and registered with the Crossroads Bank of Enterprises under number 0564.960.563.

Personal data means every type of information that concerns an identified or identifiable natural person; all data that can be traced to your physical person, including in a professional context. Processing covers a full range of processing activities, such as collecting, organising, structuring, storing, consulting, etc.

Clinic6 SPRL aims to process your personal data in a lawful, honest and transparent manner.

In this Privacy Statement, we explain what information about you we collect, what we use this information for and to whom this information is disclosed. You will also find out what rights you have and how to exercise them in this Privacy Statement.

1. Whose personal data do we process?

Clinic6 SPRL processes the personal data of natural persons with whom it has a direct or indirect relationship, whether currently, in the past or in the future.

Thus this includes the data of our current customers, suppliers, clients and employees, as well as prospective customers and employees.

2. Why do we process personal data?

Clinic6 SPRL collects and processes personal data for the following purposes:

To provide our customers with our products and services

We process personal data in order to supply our products and services as requested.

This means that we always collect the name, street address, town or city, telephone number and email address of our customers, as well as their VAT and company registration numbers. To enable us to deliver custom work, we may also need to collect certain personal characteristics and preferences from our customers (e.g. age, sex, diplomas or certificates, specialist areas, most frequently used products etc.) and social demographic data (e.g. information about the family). The types of personal data we collect may differ depending on the products and services we supply to our customers. Thus we also process personal data (including contact details) with regard to a customer's colleagues, such as their position within the company, mobile telephone number etc.

This processing of personal data is necessary for the fulfilment of our contract with our customer and to provide guarantees afterwards (also to end users).

Financial administration

Clinic6 SPRL processes personal data for the purpose of its own bookkeeping and invoicing. This concerns identification and invoice data.

This processing can be classified firstly as a legitimate interest on the part of Clinic6 SPRL, particularly with regard to its ability to keep administrative records and receive payment for the products and services it supplies, and secondly as necessary to satisfy its legal obligation to keep its accounts and fulfil its tax obligations.

Maintaining customer relations

Clinic6 SPRL processes personal data in order to send emails, collect feedback and mailings by post about any products and services provided by us that we believe to be of interest to the recipient.

Sending emails and post to our customers is a legitimate interest and also part of our after sales services, arising from our agreement with the customer. It is in your interest as well as ours that you, as a customer, are duly informed about our activities and new products and/or services.

Collaboration with third parties

When we work with third parties (e.g. suppliers) we will always process their name, address, telephone number, email address, company registration number and bank account number.

This processing is necessary for the fulfilment of the contract between Clinic6 SPRL and the third party.

Recruitment

Clinic6 SPRL processes personal data with a view to recruiting new employees.

The legal grounds of this processing are based firstly on the prospective employee's consent and secondly on our legitimate interest with regard to recruiting a suitable candidate for a position.

In addition to this, we process the personal data of all employees currently in our service within the context of the fulfilment of employment contracts and with a view to fulfilling our statutory social security and tax-related obligations.

Direct Marketing (permission)

Subject to your consent, we collect your personal details in order to send you specific newsletters, information about activities and other matters that may be of interest to you.

3. With whom do we share personal data?

Your personal data will never be shared with third parties for commercial purposes.

Your personal data within Clinic6 SPRL

At Clinic6 SPRL we treat your personal data with the utmost care and will only disclose the data that is needed to offer you the best services possible.

Clinic6 SPRL has taken measures to guarantee that any personal data that is exchanged or shared within the company is protected.

Your personal data outside Clinic6 SPRL

Clinic6 SPRL works with third parties with whom we are not legally required to share personal data, but whom we sometimes call upon for the services we provide.

These third parties are, firstly, distributors, contractors and subcontractors, operators, applicators and so forth, with whom we work in order to realise certain projects.

Secondly, there are also third parties who help us with:

- the design and maintenance of our internet tools and applications;
- the management of our servers;
- the extension or optimisation of our services;
- the collection of outstanding invoices.

Our partners are required to comply with the Privacy Act and the GDPR (General Data Protection Regulation). They have to treat the personal data provided to them by Clinic6 SPRL with due care and are prohibited from using this data for any purposes other than those for which it was disclosed to them.

Sometimes we are also obliged by law to share your personal data with external parties. This concerns the following third parties in particular:

- Public authorities and regulatory bodies (in the event of a statutory obligation to share or disclose customer data);
- Judicial authorities or investigative bodies, such as the police, the public prosecutor, etc.

We make use of social media applications on or in connection with our website. We would like to point out to you that all personal data you disclose to these social media applications can be read, collected and used by other users of these applications. Clinic6 SPRL has little or no control over these other users and therefore cannot guarantee that all social media applications will comply with this Privacy Statement.

4. How do we secure your personal data?

Clinic6 SPRL has developed various security measures to ensure that your personal data is kept safe, accurate and updated. Specifically, we aim to prevent unauthorised access to or unauthorised editing, disclosure or destruction of your personal data in our possession.

If any incidents do occur in which the privacy of your data is threatened or violated we will take suitable counter-measures and comply with the required registration and information obligations in the context of the GDPR.

5. How long do we retain your personal data?

We will not retain your personal data for any longer than needed for the performance of our activities and the provision of our services, unless we are obligated to retain your personal data for a longer period of time due to a statutory obligation, or because the term within which judicial proceedings may be instituted has not expired.

In any event, your customer file will not be retained for any longer than ten years after the termination of our customer relationship (last invoice), which is necessary in connection with the product warranty we provide, among other reasons.

6. What are your rights?

You have various rights with regard to your personal data that we process, as listed and discussed below.

If you wish to exercise any of these rights, you may contact info@freezpen.com.

The right of access:

You have the right to receive confirmation of the fact that we process your personal data and to request a copy, free of charge, of the personal data about you that we store.

The right to rectification:

You have the right to ask us to edit your personal data in our possession, or to correct or supplement any erroneous personal data.

The right to erasure and the restriction of processing:

You have the right to ask us to erase your personal data. If so, you will acknowledge that following a request for the erasure of personal data certain services can no longer be provided.

You may also ask us to restrict the processing of your personal data.

The right to object:

You have the right, at all times, to object to the use of your personal data. You will, however, need to substantiate this request. You can also expressly object to the processing of your personal data for the purpose of direct marketing, without needing to substantiate such a request.

The right to withdraw your consent:

You have the right, at all times, to withdraw your consent to the processing of your personal data (on the condition that the processing is based on your consent).

The right to data portability:

You have the right to obtain receive the personal data concerning you that we process in a structured, commonly used and machine-readable format. You also have the right to have this data transmitted to other data controllers.

The right to lodge a complaint:

You have the right to lodge a complaint with the Belgian Data Protection Authority:

Data Protection Authority

Drukpersstraat 35
1000 BRUSSELS
Tel.: +32 (0)2 274 48 00
Fax: +32 (0)2 274 48 35
contact@apd-gba.be

7. About this Privacy Statement

Our Privacy Statement may be amended from time to time. All amendments will be published on this web page.

If you have any further questions about our privacy policy, you can contact us at info@freezpen.com
Our data controller is Mr Erik Hermans, Managing Director, Rue des Journaliers 1, 7822 Ath (Ghislenghien), Belgium.