

Privacy Policy

This version is effective since: 06/11/2020

Introduction

Paynovate SA values your privacy and cares about the way in which your personal information is treated. Our firm makes all possible efforts to guarantee full compliance with privacy legislation.

This Privacy Policy is intended to inform you, in a transparent manner, about the data we collect, the purpose for collecting it, the way we use it and the rights you have regarding the processing of such data.

We draw your attention to the need to read this policy carefully. If you have any other questions, do not hesitate to contact us at the following address: privacy@paynovate.com

Please note that we may make changes to this privacy policy from time to time, for example, to comply with new legal obligations. We encourage you to review this privacy policy periodically to be informed of how we use your personal information.

Who is data Controller

Paynovate SA is the controller of your personal data.

Paynovate SA

18 Rue des Colonies
B-1000 Brussel
Belgium

Belgian business registry (BCE) number: BE0506 763 929.

If you have any questions about this privacy policy or want to exercise your rights set out in it, you can contact us at the following address:

By mail:

Paynovate SA

18 Rue des Colonies
B-1000 Brussels
Belgium

By e-mail:

privacy@paynovate.com

What data do we collect

We collect personal data including:

- Identifying information, such as name, job title/position, company you work for, postal address, telephone number, mobile phone number, fax number and email address;
- Financial information, such as credit card number, IBAN and BIC/SWIFT, invoicing information;
- Further business information necessarily processed in a project or client contractual relationship;
- Information communicated in the context of our communications;
- Any other data that you would voluntarily communicate to us.

Why do we collect your data

We may collect personal data from you in the course of our business, when you contact or request information from us, when you engage our services.

We process your data for various purposes. For each purpose, only the data relevant to the pursuit of the purpose in question are processed. Your personal data may be processed for the following purposes:

- To establish, carry out and conduct the contractual relationship with the client;
- To provide the services;
- To manage and administrate business relationships, including processing payments, accounting, billing and collection, support services;
- To respond to requests for information;
- For any marketing activities and promotions proposed to clients who have given their consent;
- For any other purpose to which you had expressly consented.

Personal data can be processed on one or more of the following legal basis:

- Performance of a contract: Paynovate SA needs to collect some of your data to answer any of your requests. If you choose not to share this data with Paynovate SA, it may render the performance of the contract impossible;
- Your consent;
- Compliance with legal and regulatory obligations;
- Paynovate's legitimate interest: Paynovate SA has a legitimate interest in interacting with you, to respond to your requests and especially to improve the services, prevent abuse and fraud, control the regularity of the operations, exercise, defend and preserve Paynovate's rights, unless such interests are supplanted by your interests or your fundamental rights and freedoms requiring the protection of your personal data.

If the legal basis of the processing is your consent, you have the right to withdraw it at any time without prejudice to the lawfulness of the processing performed prior to withdrawal.

You have the right to unsubscribe at any time from newsletters and other commercial communications for direct marketing purposes. To unsubscribe, you must send an e-mail to the following address: info@paynovate.com or click on the unsubscribe link at the bottom of each e-mail.

With whom your data are communicated

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them. These are subject to a strict obligation of confidentiality.

Your personal information will only be communicated to third parties to the extent that such information is necessary for the performance of a contract. In this case, the third parties will only communicate this information to other third parties if this is necessary for the performance of the contract or if they are obliged to do so by law and regulations.

How long do we store your data

We will keep your personal data no longer than necessary for the purposes for which we collected the data (see point “Why do we collect your data”).

Paynovate SA will retain personal data where required to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

Once this goal is achieved, all personal data is deleted or anonymised.

How your data are protected

Paynovate SA implements appropriate technical and organizational measures to protect your personal data from destruction, loss, modification or any un-authorized processing. These measures for protecting personal data will regularly be adjusted to the technical developments and organizational changes.

In this respect, our partners, employees, consultants, workers and data processors, who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

What are your rights as data subject

In compliance with privacy regulations and within the limits of these regulations, data subjects have the following rights regarding data processing activities by Paynovate SA :

- **Right of access**
You are entitled to request details of the information we hold about you and how we process it.

- **Right to rectification**
You are entitled to have your personal data corrected if it is incomplete or inaccurate.

- **Right to erasure**
You are entitled to obtain the deletion of personal data, except those which Paynovate has a legal obligation to keep on record.

- **Right to limitation of processing**
You are entitled to obtain limitation of processing of your personal data and, in case of restriction have the processing limited to mere storage.

You may obtain a limitation of processing when you object to the processing, when you contest the accuracy of the data, when you consider that the processing is illegal.

- **Right of portability**
You are entitled to receive personal data you've provided us with, in a structured, commonly used and machine-readable format and are entitled to ask us to send this data to another data controller.

- **Right to withdraw consent**
Where processing is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. We may be able to continue to process your personal information to the extent required or otherwise permitted by law.

- **Right to object**
You have the right to object, on certain grounds relating to your particular situation, to the processing of your personal data at any time.

Any request should be addressed to Paynovate SA, to which must be attached a copy of both sides of your identity card.

By e-mail: privacy@paynovate.com

By mail:

Paynovate SA

18 Rue des Colonies
B-1000 Brussel
Belgium

Paynovate SA commits to examine any requests or complaints and to reply in a timely manner and in any case within one month of receipt of the application. If necessary, this period can be extended by two months, given the complexity and the number of requests.

– **Right to lodge a complaint with a supervisory authority.**

In any case, you are entitled to lodge a complaint with the Data Protection Authority:

By e-mail: contact@apd-gba.be

By mail:

Data Protection Authority
Rue de la Presse 35
B – 1000 BRUSSEL
Tel: +32 (0)2 274 48 00

Do we transfer data abroad

We only transfer your data to a non-EU country if it provides a level of protection equivalent to what you can find in your country of residence (for more information, please consult the following [link](#)).

Minors

Our website and our services are not targeted to children under the age of 18. If you learn that your minor child has provided us with their personal data without your consent, contact us at the following address: privacy@paynovate.com

What to do in case of dispute

In the event of a dispute between us, Paynovate SA commits to give priority to dialogue and openness in search of an amicable solution. You can also contact the Data Protection Authority.