

# PRIVACY NOTICE

## BELCHIM CROP PROTECTION NV

(Applicable as from May 25<sup>th</sup> 2018)

This Privacy Notice is provided by Belchim Crop Protection NV/SA, Technologielaan 7, 1840 Londerzeel, Belgium, registered with the Central Enterprises Register under the number BTW BE 0458.909.077 (RPR Brussels), who is responsible for the processing of your personal data as described in this Notice (directly or through its affiliated companies).

The protection of your personal data is very important to the whole Belchim group, meaning Belchim's headquarter Belchim Crop Protection NV/SA including all its affiliated companies (hereinafter collectively "we"). Therefore we aim to be at all times 100% compliant with EU legislation (and in particular the General Data Protection Regulation or "GDPR") and local legislation in respect of privacy and data protection.

Our aim is to process your personal data in a manner that is lawful, appropriate and transparent. Hereafter we inform you which of your personal data we collect, the reasons why we use and share such data, how long we keep it and how you can exercise your rights.

### 1. WHICH OF YOUR PERSONAL DATA DO WE COLLECT?

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalized products and services.

We collect various types of personal data about you, and more specifically:

- ✓ *identification information* (e.g. first name, name, language, gender, IP address);
- ✓ *contact information* (postal address and e-mail address, phone number, fax);
- ✓ *employment information* (employer's name and your function within this company);
- ✓ *banking and financial data* (e.g. bank account details);
- ✓ *data which relate to your use of our products and services:*
  - Are you a dealer, a farmer, a contractor, an independent advisor, a researcher, a teacher, do you work for the government, etc.?
  - Do you need commercial or technical information?
  - Do you need technical information for all crops or for specific crops?
- ✓ *data from your interactions with us:* our internet website, meetings, calls, emails;
- ✓ *data that are provided by official authorities.*

We do not process personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex life.

## **2. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?**

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### **A. To comply with our legal and regulatory obligations**

We use your personal data to comply with legal and regulatory obligations (eg. to answer official queries from duly authorized public or judicial authorities).

Moreover we are obliged to provide our customers/farmers with technical support (eg. if our products are not used/treated/stored/transported in a correct manner, they might cause material or personal damages).

### **B. In respect of our contractual relationship with you or the company of whom you are an employee**

We use your personal data to enter into and perform our contracts, including:

- ✓ to provide you with information regarding our products and services;
- ✓ to evaluate if we can offer you a product or service and under which conditions; and
- ✓ to provide products or services to our corporate clients of whom you are an employee.

### **C. To fulfil our legitimate interest**

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, such as:

- ✓ fraud prevention;
- ✓ IT management/security and business continuity;
- ✓ establishing statistics for research and development;
- ✓ personalize our offers to you (eg. advertising products or services that match with your situation and profile), which can be achieved by :
  - segmenting our prospects and clients;
  - analysing your habits and preferences (in your use of our products and services or in your interaction with us through the various channels
  - sharing your data with another Belchim affiliate;
  - matching our products or services with other data we've processed about you.

### **D. To respect your choice if we have requested your consent for a specific processing**

In some cases we must require your consent to process your data (eg. for direct marketing purposes).

## E. To process data from electronic communications

In addition to any recording of electronic communications that is either legally authorised or imposed or to which you have consented, we may record electronic communications with you, including the related traffic data, if we do so in the course of lawful business practice for the purpose of providing evidence of commercial transactions, or communications that took place through these electronic communications including the content of these communications (including any advice being given by us).

We may retain such records as long as legally required or permitted including for the period of time during which a dispute may arise further to the electronic communication recorded between you and us. The above applies to all electronic communications (such as e-mails, SMS, instant messaging services or other equivalent technologies).

### 3. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

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We do not sell or hire your personal data to third parties.

We only disclose your personal data within the Belchim group to Belchim affiliates. Some of these affiliates are located in Canada or USA, which have both been officially recognized as providing an adequate level of protection for personal data.

Exceptionally we might provide your personal data to external service providers of consultants, however this will only happen in the execution of a service for and/or on behalf of Belchim and only after such service provider or consultant has signed a confidentiality agreement (protecting your personal data).

### 4. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

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We use your personal data for a specific purpose or aim. Once that purpose/aim no longer exists, we delete the data.

The starting point for storing your personal data is the statutory retention period (which is often ten years after the end of a contract or execution of a transaction). The period can be longer where needed for the exercise of our rights. If no retention period is stipulated by law, it can be shorter.

### 5. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

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In accordance with applicable regulations, you have the following rights:

- ✓ **To access or to inspect:** you can obtain information relating to the processing of your personal data and a copy of such personal data. If you exercise your right of inspection, we will give you a complete overview of the data which we've collected about you.
- ✓ **To rectify:** where you consider that your personal data are inaccurate or incomplete, you can require us to adapt such personal data accordingly.
- ✓ **To erase or to restrict:** you can require us the deletion of your personal data and/or you can request the restriction of the processing of your personal data.

- ✓ **To object:** you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes.
- ✓ **To withdraw your consent:** where you have given your consent for the processing of your personal data (mainly for marketing purposes), you have the right to withdraw your consent at any time.
- ✓ **Data portability:** where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party of your choice.
- ✓ **To complain:** you can lodge a complaint with the competent EU data protection authority (eg for Belgium: [www.privacycommission.be](http://www.privacycommission.be)), in particular in the country where you reside, where you work or of the alleged infringement of the data protection and/or privacy regulations.

If you wish to exercise one of the rights listed above or in case you have any questions relating to our use of your personal data or this Privacy Notice, please contact us as follows:

- ✓ By preference by email to [privacy@belchim.com](mailto:privacy@belchim.com) (attention Bruno Lauwers), or
- ✓ Alternatively by letter to Belchim Crop Protection NV, Technologielaan 7, 1840 Londerzeel, Belgium (attention Bruno Lauwers).

Be as specific as possible any time you wish to exercise your rights. We can only properly answer queries couched in sufficient detail. We will need to verify your identity in as much detail as possible, in case someone else tries to exercise your rights. You may therefore be asked to provide a proof of identification (eg. ID copy) when making such a request.

## 6. MISCELLANEOUS

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### A. Data protection and confidentiality

We take the necessary precautions to protect your personal data. Our safeguards include technical means and policies and procedures that our staff is trained to follow.

Only authorized employees (on a “need to know” basis) have access to your personal data. Moreover all authorized employees have signed a confidentiality statement.

### B. Updates

We may make changes to this Privacy Notice at any time. The most recent version is always available on our website ([www.belchim.com](http://www.belchim.com)).