

Privacy Statement – Processing of personal data

This privacy statement describes how Affluo CV, with registered offices at Berkenlaan 8A+8B, B-1831 Diegem (Belgium), company number 0723.713.337 and VAT number BE0723.713.337 processes personal data in the context of its activities.

Affluo endeavours to process your personal data in compliance with the European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation or “GDPR”).

How does Affluo use your personal data?

Affluo processes personal data in the context of its activities for different purposes:

- Client management (contractual necessity) (legal obligation)
 - Identification and contact details
 - Financial data
 - Personal characteristics
 - Information relating to occupation and career
 - Personal data relating to proceedings, criminal convictions and offences or related security measures
- Direct marketing (legitimate interest, i.e. direct marketing) (consent)
 - Identification and contact details
 - Personal characteristics
 - Information relating to occupation and career
- Supplier management (contractual necessity)
 - Identification and contact details about you and some of your employees
 - Financial data
 - Information relating to occupation and career
- Compliance with our legal and regulatory obligations (legal obligation)
 - Identification and contact details
 - Financial data
 - Identity card number and national number
- Fraud prevention and detection (legitimate interest, i.e. fraud prevention and detection) (legal obligation)
 - Identification and contact details
 - Financial data
 - Identity card number and national number

The legal ground for the processing of your personal data by Affluo is mentioned above for each purpose.

Some personal data are obtained from third parties (e.g. your advisors provide us personal data following your instructions, including notaries-public, lawyers and other professional advisors, from public sources (the Belgian State Gazette, the Crossroads Bank of Enterprises and other public services) and from certain private sources (social media and B2B databases).

If the legal ground is contractual necessity or legal obligation, the personal data must be provided to enable the performance of the agreement or to comply with legal obligations. Failure to provide the required personal data shall prevent the start or the continuation of our professional relationship.

Personal data concerning proceedings, , criminal convictions and offences or related security measures are processed solely in the context of the defence of the interests of our clients (article 10, §1, 2° of the Act of 30 July 2018 concerning the protection of natural persons in relation to the processing of personal data).

The retention periods of the personal data are as follows:

- Client management: 10 years after the end of the agreement;
- Supplier management: 10 years after the end of the agreement;
- Fraud detection and prevention: 10 years after the end of the agreement/transaction;
- Direct marketing: 3 years after the last meaningful contact, it being understood that a renewal is possible following consent;
- Compliance with legal obligation: data retention period as imposed by law.

International data transfers

Affluo employs the services of ICT service providers for certain services. These ICT service providers export a limited set of personal data to third countries, i.e. to the United States of America. For this transfer of personal data, these service providers rely on EU/US Privacy Shield and model clauses approved by the European Commission. Should you require more information, feel free to contact us.

The transfer of personal data only relates to identification data and contact details for client management and direct marketing purposes.

Personal data processed as part of our files is stored solely in the EU.

Recipients of your personal data

Affluo shares your personal data under certain circumstances with a limited number of recipients:

- We share your personal data with you and, as the case may be, (a) your employer or some of your employees and (b) professional advisors designated by you;
- We share your personal data with banks, insurance companies and brokers, in the context of your relationship with those parties;
- We share your personal data with public authorities, courts, supervisory authorities and our bar within the context of our legal and deontological obligations
- We share your personal data with other professional advisors, lawyers, bailiffs and (court appointed) experts, insofar as necessary for our services
- We rely on a number of technical service providers (processors), e.g. the hosting of our website, files and matters, with whom we have concluded data processing agreements

Your rights under the GDPR

According to the General Data Protection Regulation (GDPR), you have the following rights:

- to access and receive a copy of your data;
- to rectify your data if it is inexact;
- to object to the processing for direct marketing and for reasons related to your particular situation;
- to erase or restrict the processing of your data (“right to be forgotten”);
- when the processing is based on consent, to retract your consent at any time;
- to data portability when the processing is based on consent or contractual obligation.

You have the right to lodge a complaint with the competent supervisory authority (for Belgium, it is the Belgian Data Protection Authority). In case of complaint, we invite you however to contact us to find an amicable solution.

To exercise these rights, you must respect the conditions provided by the RGPD. Alternatively, to make things easier, you can contact us at the address below.

In case of reasonable doubt about your identity, we reserve the right to ask for proof of identity.

How to contact us?

You may contact us at any time at the address below:

Affluo CVBA
Berkenlaan 8A+8B
1831 Diegem
privacy@affluo.be

Updates

Please note that we reserve the right to update this document from time to time. In this case, you will be informed of the changes by e-mail or through our website.