



Privacy Policy



Banimmo (“we”; “us”; “our”) is committed to protecting and respecting your privacy. This privacy policy (“Policy”) details its approach thereon. The data controller<sup>1</sup> collecting the data described herein is Banimmo, having its registered office at Bischoffsheimlaan 33, 1000 Brussels, registered with the Crossroad Bank For Enterprises under number 888.061.724.

This Policy is addressed to anyone who comes into contact with us, in particular visitors of our website or our premises (including parking), recipients of e-mails, our newsletters or event invitations, our business associates and our other valued contacts (“you”).

All data we collect from you will be processed by us in accordance with the 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 (“GDPR”) and any applicable corresponding or equivalent law or regulation, as in force and applicable, and as may be amended, supplemented or replaced from time to time.

Banimmo will continue to review this Policy on a regular basis and where necessary adapt it to developments within Banimmo, its policies, applicable laws and regulations.

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<sup>1</sup> /i.e. any natural or legal person, public authority, service or other organization which, alone or jointly with others, determines the purpose and methods of processing.



This Policy applies to any processing of personal data within Banimmo.

*Processing* means any (series of) operation(s) carried out, or not, via automated processes and applied to (series of) data of a personal nature (e.g. collecting, recording, deleting, etc.).

*Personal data* means any information relating to an “*identifiable natural person*” (“data subject”), meaning a natural person who can be identified, directly or indirectly, in particular by reference to: (a) an identifier such as a name, an identification number, location data, an online identifier; or to (b) one or more elements characterizing the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

The personal data that Banimmo processes can be summarized as follows :

<i>Purpose(s) of processing</i>	<i>Type of personal data</i>
Communication and marketing, in particular the sending of our newsletters, press releases and invitations to events.	Name, first name and email address, phone number, company address (“ <u>Contact Information</u> ”) and business card.
Facilities, in particular visitor sign-in and registration, parking management, security and access within our buildings, fire safety, access badges.	Name, first name, e-mail address, company they work for and vehicle number plate (“ <u>Identification data</u> ”)
<i>Facilities, premises and building sites, in particular camera surveillance for theft prevention and security.</i>	<i>Camera footage</i>
Finance, in particular the execution of payments to (business) relations and service providers.	Contact data, company data, and bank account number.
Selection and recruitment, in particular the applicant selection process.	CV, personality analysis, LinkedIn (“ <u>Application details</u> ”).
Business activities (operational functioning, day-to-day management and administration).	Contact details, telephone number, photo, video, date of birth, marital status, financial, corporate, contractual and economic information (e.g. professional experiences and skills, CV, shareholders, directors,...), copy of ID.

Banimmo will only process your personal data if:

- (i) the data subject has given us permission to process her/his personal data for one or more specific purposes, e.g.: for the processing of Contact Information in the context of communication and marketing;
- (ii) such processing is necessary for the performance of an agreement to which the data subject is a party, or in order to take measures at the request of the data subject prior to and in view of entering into an agreement;



- (iii) such processing is necessary to comply with a legal obligation incumbent on Banimmo (e.g. anti- money laundering legislation);
- (iv) such processing is necessary to pursue the legitimate interests of Banimmo or a third party, except where the interests or fundamental rights of the data subject requiring protection of personal data outweigh those interests, e.g. where the data subject is a minor.

### *How does Banimmo obtain personal data?*

Personal data processed by Banimmo is collected:

*(a) directly* Banimmo processes personal data that we receive directly from you, when you:

- (i) communicate your personal data to us in the context of selection and recruitment, or in the context of our business activities;
- (ii) Attend our corporate events (photos and video images)
- (iii) Access our premises or building sites (security camera images);
- (iv) communicate your personal data to us through our website <https://www.banimmo.be/>; and/or any other website that Banimmo uses when performing its business;
- (v) subscribe to our newsletters; press list or investors mailing list;
- (vi) submit an application file within the framework of our business activities;
- (vii) conclude an agreement with us in your own name or as a representative of a legal entity and we carry out a prior verification of your identity and/or power of representation;
- (viii) contact us directly by e-mail, phone or otherwise;
- (ix) give us your business card or connect with us on professional social media platforms such as LinkedIn.

*(b) indirectly* Banimmo also processes your personal data which we receive through:

- (i) recruitment agencies and our external service providers in the context of taking a personality analysis as part of our selection and recruitment; or
- (ii) external public sources for economic, corporate and financial information such as the Belgian Official Gazette, the Crossroads Bank for Enterprises, the National Bank of Belgium, public LinkedIn-profiles, or your company's website, etc. in the context of our business activities.

### *How long does Banimmo retain personal data?*

*Camera images from corporate events are kept until the data subject informs us that it no longer agrees with the retention of its personal data;*

*Camera images from the security cameras in and on our premises and building sites are kept after your visit for as long as allowed by law, except if requested by the police, the public prosecutor or our legal department in case the camera images indicate potential criminal activity and/or incidents in which case they are kept until the complaint is settled.*

*Personal data* we obtain through the website (e.g. when you subscribe to our newsletter) will be held until such time as you inform us that you no longer wish to receive our mailings, or if it appears that your email address is no longer in use.



*All email communication* with us can be stored in our backup system for governance and audit purposes, in accordance with applicable law.

#### *Who has access to your personal data?*

- (a) *Banimmo Collaborator*, who receives adequate training and familiarizes itself with this Policy, only has access to your personal data to the extent they need it to perform their duties. Our Collaborator is contractually bound to treat your personal data strictly confidential.
  
- (b) If and when we use *service providers* to carry out processing activities on our behalf as a processor, we will only appoint processors who provide adequate guarantees with regard to (a) the appropriate level technical and organizational expertise to ensure that the processing meets the requirements of this Policy and the applicable rules and regulations and (b) the protection of the data subject's rights. This applies, for example, to: (i) parties from whom we purchase licenses for software or hardware systems, (ii) companies that help us organizing our events and send our event invitations, (iii) parties commissioned by us to carry out payroll administration or other tasks related to the administrative processing of human resources, (iv) our auditors, consultants and legal service providers to the extent necessary for, and limited to, their services. A data processing agreement will be concluded with each processor, defining the subject and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects, and the rights and obligations of the processor and the data controller.
  
- (c) *Competent authorities* We may provide the competent governmental authorities (e.g. police authorities, judicial authorities, government agencies) with access to your personal data when access is necessary: (i) under applicable laws or regulations, (ii) in the context of judicial investigations or information requests, or (iii) for the exercise of our defense in court.

#### *Transfer of personal data outside the European Economic Area ("EEA")*

In principle, we do not process your personal data outside the EEA. In the exceptional cases where this would nevertheless happen (e.g. via our service providers), we will make sure that your information is protected by the following safeguards:

- (i) the laws of the country to which your information is transferred ensure an adequate level of data protection; or
- (ii) the transfer is subject to data protection clauses approved by the European Commission or by the Belgian data protection authority; or
- (iii) the transfer is based on binding corporate rules; an approved Code of Conduct; or an approved data transfer agreement.

#### *How do we protect your personal data?*

We treat your personal data confidentially and with the utmost care. We secure our systems – within reason – against loss and/or against any form of unlawful use or processing. In doing so, we use appropriate technical and organizational measures. Your data is adequately secured in accordance with GDPR and is stored on servers located in controlled and secured environments. Without prejudice to the



aforementioned efforts, you should be aware that there is always a risk associated with sending personal data through the Internet. We can therefore never fully guarantee the security and protection of your personal data.

*What are your rights as a data subject?*

If you have provided us with your personal data, you have the right to ask us, free of charge, to notify you what kind of personal data we hold and, if necessary, ask us to correct, limit, transfer in electronic format or delete personal data free of charge. However, note that, insofar as the personal data in our possession is kept for the purpose for which it was obtained (and within the corresponding retention periods), we have no obligation to comply with this request. In such a case, we will examine whether it is possible – and to what extent and under which conditions – to meet your request in accordance with the applicable legal and regulatory framework. You have the right to revoke your consent regarding the processing of your personal data at any time. However, this revocation will not affect the lawfulness of the processing of your personal data for the period preceding the moment of this revocation.

You have the right to lodge a complaint with a supervisory authority. For the contact details of the Belgian Data Protection Authority, please refer to the following website: [www.dataprotectionauthority.be](http://www.dataprotectionauthority.be)

*Questions?* If you have any questions regarding this Policy, please do not hesitate to contact our data protection officer (“DPO”) (a) by letter at: Bischoffsheimlaan 33, 1000 Brussels; (b) by telephone at 02/710.53.11; or (c) by email at [privacy@banimmo.be](mailto:privacy@banimmo.be). You can contact the DPO regarding all matters relating to the processing of your data e.g. with regard to: the purposes of the data processing; the legal basis of the processing; the categories of personal data concerned; the duration of storage of personal data; the right to request the deletion of data and the restriction of data processing; the right to object to the processing; etc.

Version history	
Version number	Validation date
1	15/02/2024