



## Privacy statement of idlegcy NV

*This is the privacy statement of idlegcy NV, Kastanjelaan 81, BE-9620 Zottegem, BE-0686.716.547. The company idlegcy NV shares its database with one of its major investors Participium CVBA, Kastanjelaan 81, BE-9620 Zottegem. The privacy statement consists out of a general body text for the general business relations database of Participium & C°, and one annex for the personal data that are stored in the idmanager web application.*

### 1 General body text for the general Business Relations database of Participium & C°

Participium CVBA, together with all the associations in which the managing director or chairman has been delegated by Participium CVBA, and all the companies in which Participium CVBA holds at least 10% of the capital<sup>1</sup> are called "Participium & C°" within this agreement. They share their business relations data in a single database.

#### Group of companies with one goal: more respect for customers

Participium & C° is a group of companies that want to make medium-sized industrial and B2B companies more successful in the heart of Europe by putting the customer and the success for that customer at the centre. Our shared social goal is to show more respect for "being a customer". Both in B2B and in B2C, customers are increasingly becoming the determining factor for success and growth, as the new Industry 4.0 concepts will take effect. In other words, customer orientation is also a very useful approach from a purely business perspective.

#### Respect for customers starts with privacy

We extend respect for customers to the identity of our customers and of all business relations. On the one hand, we do our utmost to protect the details of our relations in good order. On the other hand, we also want to be clear about which data we keep for whatever reason. And finally, we want to give every relationship the chance to request the data, to change it and, if necessary, to delete it. We have designed a special web tool for this: idmanager. Via idmanager it is much easier to identify yourself, to retrieve the data we keep, or to contact our Privacy Manager. You can find idmanager via this link: [www.idlegcy.com/idmanager](http://www.idlegcy.com/idmanager).

#### Why we keep that data

Participium & C° keeps records in order to be able to execute contracts qualitatively, to comply with all legal obligations and to be able to function as a group of companies. In addition, Participium & C° strengthens the functioning of its customers by providing new contacts to those customers who must allow them to broaden their existing networks and develop new ecosystems. This means that

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<sup>1</sup> The group of companies and associations changes regularly. In May 2018 it consists of Participium CVBA, Community vzw and the following companies: Forte NV, Forte Belgium CVBA, Institute 4.0 SA, People 4.0 SA, FunkyTime SA, IDlegcy SA, DIA Technologies NV.

Participium & C ° must regularly look for new contacts, both to realize direct business growth and to help realize and increase the business growth of its customers.

### **To inform and work together optimally**

We typically keep the following information from a person:

- First name, name, gender, language and job title: the basis for a correct greeting and identification
- Position, department, budget authority: the basis for making a correct role assessment
- E-mail address (es): for correct information provision and contact
- Direct telephone number and / or mobile number: for correct follow-up of projects or requests
- How we can most easily reach this person for faster contact
- If available, a recognizable recent photo: makes every collaboration much more concrete
- Possible retirement or death: to avoid incorrect contact
- Company, address, general telephone number and website: for correct addressing
- Segmentation information such as company size and sector: for better pre-filtering of communications
- If available private contact: to reach each other in the meantime between two employers
- Any previous employers: to make a better assessment of the experience and network contacts
- The mailings that this person already received from us: to avoid duplicate communications
- The privacy settings: so that we do not bother anyone undesirably and unnecessarily
- The offers and other correspondence with this person: for professional follow-up
- The projects in which this person was involved: for a clear internal information transfer
- A trace of the telephone appointments we made: to avoid repeated questions

### **More concretely: about our customers**

We keep records of customers about all persons with whom we have had contact in recent years for the execution of our cooperation, or of which we know that they are in a position that they can exert a significant influence directly or indirectly. Since our customers are often part of a larger group, of a partner network or of a larger ecosystem, the foregoing often applies to more than just the company to which we invoice. In addition, we often also have contact with the customers of our customers, and we also need to keep track of the data of those persons in order to guarantee a professional service to our customers.

### **More concretely: about our potential customers**

We keep track of potential customers of persons in management positions and / or directorships in companies and organizations to which we can offer our services. We also keep records of investors of potential customers and of people working at investment companies that invest in potential customers.

### **More concretely: about investors and financiers**

We keep track of the personal data of investors and financiers who must allow us to actively involve these co-builders in the management and future of Participium & C °, as well as to transfer them financially and to fulfill all tax obligations. such as, for example, the possible deduction of withholding tax.

### **More concretely: about potential investors and financiers**

In addition, we keep a register of potential investors and financiers with the transferred memorandums and additional information regarding risk profile, so that we can demonstrate that we have correctly observed the procedures for raising capital.

### **More concretely: about business relationships**

In addition, we maintain the information of business relations that must allow us to assess the relevance in the larger business and social network of our customers.

### **More concretely: about journalists**

In addition, journalists keep track of what interests they have shown in the past for specific topics and which questions they have already asked in previous interviews. This information must allow us to be able to contact them even more in the future with interesting topics or press releases.

### **We keep the data for seven years**

The business cycles in which Participium & C ° and its customers operate are slow cycles of several years. We have found that some customers need our service only every four to five years. Moreover, the influencers from the ecosystems and networks in which we operate are relevant for Participium & C ° for a longer term in position and for a longer term in general. Finally, there is also the legal retention period for all accounting information, which requires us to synchronize the retention period of personal data with the legally required retention period of the accounting data. Of course, each person can request us to delete his or her personal data from our database. Thanks to ID manager, we can also continue to follow up such requests correctly, so that we do not accidentally add someone's data to our database.

### **Numerous sources**

We are active networkers and therefore receive hundreds of name cards, which are correctly processed in the database, and of which the contact person has been asked since 25 May 2018 to be able to store their data in our database. In addition, we are active on social media and the internet and we also receive numerous requests to send information, whereby we have explicitly requested permission since the beginning of 2018 to keep the data in our database. Exceptionally we purchase a mailing list from a third-party processor for prospecting purposes, whereby we make sure that the

processor has correctly acquired the contact details and has obtained permission to resell these data. The contact data from such purchased address files are only kept for 3 years and actively used in communications.

### **We do not sell contact details to third parties**

We never sell the contact details to third parties. We do, however, automatically share the information that is created at one of the companies among all companies in which Participium CVBA owns at least 10% of the capital, including Participium CVBA itself. As soon as Participium CVBA owns less than 10% of the capital of a particular company, Participium CVBA will provide that company with a copy of those contact details of those contact persons who are currently working with those customers to which that company has ever received an invoice. The other data will not be transferred and the company concerned will be denied access to the original address database of Participium & C°.

### **We do everything we can to protect the data**

Participium & C° takes the necessary steps to prevent the disclosure of personal data. All employees, managers and directors have signed a cooperation agreement in which strict agreements with regard to privacy are included, including penalty clauses in the event of a manifest violation. IT systems comply with modern security standards, in line with the state of the cloud software technology.

### **Third party processors help us**

If Participium & C° relies on third-party processors to assist with the acquisition, maintenance, improvement or removal of personal data, Participium CVBA will conclude a processor agreement with those third-party processors that protects these data centrally. Participium & C° prefers third-party processors from the European Union for reasons of privacy protection.

### **Privacy rights are managed through ID manager**

Each company and association from Participium & C° has its own e-mail address (privacy @ ...) for the processing of requests for viewing the data, changing the data, opposing the use of the data and possible deletion of the data. In addition, Participium & C° ID manager acts as processor of the personal data with the aim of correctly tracking the privacy rights from a single location and receiving, maintaining and processing any requests for information provision, data modification or deletion correctly and automatically. With idlegcy NV, the developer of ID manager, we have a processor agreement whereby idlegcy NV indemnifies us against any damage claims that would result from a faulty or careless operation of their platform.

Participium CVBA, Kastanjelaan 81, BE-9620 Zottegem.

- Data Protection Officer: Paul Indekeu
- Privacy Manager: Mieke Van Snick