

# Privacy statement

## The controller

Your personal data is collected and processed by Cable-heating.com, hereafter referred to as "CABLE HEATING.

## Scope of the Privacy Statement

CABLE HEATING values privacy and is therefore committed to protect the (personal) data of all its stakeholders with the greatest possible care, and to process personal data only in a fair and lawful manner. This Privacy Statement is applicable to our customers, partners and website visitors for the personal data collected and processed by CABLE HEATING through this website and the related services.

This Privacy Statement contains essential information on how CABLE HEATING, as the data controller, collects and processes personal data, for what purposes and explains your rights as a data subject.

## Processing of Personal Data

Personal data can be defined as any information that allows a natural person to be identified, directly or indirectly. You can provide us with your personal data in the context of the following activities, for the corresponding purposes and based on the stated grounds:

- **Contact form or correspondence:** By completing the contact form on the website, you consent to CABLE HEATING processing your name, email address and your question or message. If you contact us directly (by e-mail, telephone or letter), we will process your contact details and the content of this correspondence. We only use this information to sufficiently handle your question or message.
- **Newsletter:** If you subscribe to our newsletter, you provide us with your name and email address. CABLE HEATING collects these data based on your consent and for the purpose of sending you relevant information and keeping you up to date with our latest news. We use an external service provider (Mailchimp) to monitor the delivery of our newsletter.

Also, our newsletter contains so-called 'tracking pixels'. A tracking pixel is a miniature image that allows a statistical analysis of the impact of a marketing campaign e.g. to check whether the email containing the newsletter was opened. The personal data collected through these pixels are stored and analyzed for the purpose of optimizing the form and content of the newsletter and to better align the content with your interests in the future. These personal data are not passed on to third parties.

- **For sales and marketing purposes:** CABLE HEATING can use your name and contact details for direct marketing campaigns, to inform you on promotions with regard to the products and services CABLE HEATING provides, and to contact potential future

customers. We can also use the data to make targeted offers, e.g. via email, or to display an advertisement on our own website. We send these communications or place the advertisements, based on the legitimate interest of CABLE HEATING, if we notice that you are interested in or benefit from our services or products.

- **Survey / feedback:** Based on the legitimate interest of CABLE HEATING, we can use your contact details in order to assess, evaluate and improve the services offered to you. For this purpose, we could send out questionnaires or customer surveys, or ask you to fill out our Customer Feedback form.
- **Social media plugins:** The CABLE HEATING websites integrate plugins from Facebook, LinkedIn, Twitter and Instagram. From the moment you access our website, these social plug-ins send information to the third party platform about your device, which pages you visit and how you use our services. The plug-ins are processed regardless of whether you have an account.
- **Events:** When you register for one of our events, we ask you to provide certain information to participate in that particular event. For example, we will usually ask for your name, email address, function and organization. We collect this information based on your consent in order to complete your registration and guarantee the best event experience for everyone.
- **For the provision of our products & services:** When you buy certain products or services from CABLE HEATING, we collect your contact details and billing data. This is for the purpose of providing our services and managing our (customer) relationship and on the basis of your purchase agreement with CABLE HEATING.
- **Other relations:** We collect contact details of our current or future suppliers and partners. We process this information to enter into our agreements and to manage our relationships or collaborations. This processing is therefore based on the conclusion and execution of our contracts and business relations.

CABLE HEATING considers your personal data as confidential and commits to process it only in a way that is compatible with the purposes for which the data were initially collected.

## Your Rights as a Data Subject

At all times, the data subject has the possibility to exercise his or her rights as described in the General Data Protection Regulation. The data subject can exercise the following rights:

### Right of access

You have the right at any time and free of charge to access your personal data and to request a copy of the personal data that CABLE HEATING collects about you.

## **Right to rectification**

You always have the right to have incorrect personal data corrected, or incomplete personal data completed.

## **Right to erasure (“right to be forgotten”)**

You can request to have your personal data removed from CABLE HEATING’s systems.

The request to erase your personal data cannot always be granted due to contractual or legal obligations. CABLE HEATING will take these obligations into account when replying to your request.

## **Right to object**

You have the right to object to the processing of your personal data if the processing takes place on the ground of the legitimate interest of CABLE HEATING or on the ground of the public interest. We will stop processing unless we can prove that there are compelling legitimate grounds for the processing or for the exercise of legal claims. You can also object in the case of direct marketing, so the personal data will no longer be processed for these purposes.

## **Right to withdraw consent**

For the processing of your personal data collected by CABLE HEATING with your consent, you can withdraw your consent at any time. For example, you can always unsubscribe from the newsletters. However, the withdrawal of your consent does not apply to processing previously carried out by CABLE HEATING.

## **Right to restriction of processing**

In certain cases, the data subject is entitled to obtain the restriction of the processing of his or her personal data. We will continue to store your data, but we will restrict its use. You can e.g. submit this request when you think that your personal data is inaccurate, or the processing by CABLE HEATING is unjustified. We only have to grant these requests in specific cases as defined by law.

## **Right to data portability**

The data subject has the right to receive the personal data concerning him or her, processed by CABLE HEATING, in a structured, commonly used and machine-readable format and/or to transmit those data to another controller.

These rights can be exercised free of charge by sending an e-mail to [privacy@cable-heating.com](mailto:privacy@cable-heating.com). We commit to answer your request within one month upon its receipt. It is possible that we request additional information first in order to confirm your identity and ensure the request originates from you.

## **Right to lodge a complaint**

If, at any time, you believe that CABLE HEATING infringes your privacy, you have the right to lodge a complaint with the Belgian Data Protection Authority:

Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, e-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be).

## **Disclosure to Third Parties**

CABLE HEATING will refrain from disclosing or selling personal data of data subjects to third parties as well as publicly disclosing data subjects' personal data, unless in the following specific cases:

- Personal data can be shared between the different branches of CABLE HEATING, in case this transfer is required for the provision of our products or services in line with the predetermined purpose.
- Personal data can be shared with third party service providers to which CABLE HEATING outsourced certain processing activities. In any case, they are limited to processing your personal data in accordance with our instructions and if necessary, a data processing agreement will be concluded so they are obliged to comply with all obligations required by the applicable data protection legislation.
- If it is required by applicable laws or regulations.

Regarding international transfers of personal data and processing outside the European Economic Area (EEA), your data are only transferred to other CABLE HEATING branches or parties in third countries, such as software providers and cloud or mailing services, when permitted under the applicable data protection legislation. We guarantee appropriate safeguards which ensure that your rights are also respected by the data recipient outside the EEA in accordance with an adequate level of data protection.

## **Retention of your Personal Data**

CABLE HEATING acknowledges the importance of the protection of personal data. We do not retain your personal data no longer than strictly necessary for the realization of the purposes for which we received the data, or for the execution of a contract or for fulfilling a legal obligation. The retention periods differ with regards to the type of processing activity and the purpose for which the personal data were collected.

The personal data that we collect on the basis of your consent will be kept by us for as long as your consent remains valid.

We keep customer and supplier information about your purchases for as long as reasonably necessary to execute our agreements, to comply with our legal obligations (such as accounting and tax obligations) and to resolve disputes or enforce agreements. Therefore,

this personal information is retained for the duration of our contractual relationship and for 10 years thereafter.

In all cases, personal data may be retained for a longer period if there is a legal or regulatory reason to do so, or for a shorter period if the data subject objects to the processing of his/her personal data and if there is no longer a legitimate reason to retain them.

We guarantee to only provide limited access to archived data and to remove or render anonymous your personal data if the retention period has passed.

## **Security and Confidentiality of your Personal Data**

CABLE HEATING has taken technical and organizational security measures to prevent the destruction, loss, falsification, alteration, unauthorized access or disclosure of your personal data to third parties and any other unauthorized processing of these data.

We have made every effort to ensure the confidentiality, integrity and availability of the information systems and services that process personal data. These measures include physical and operational security measures, access control, awareness raising and confidentiality clauses. All our employees and third parties engaged by us are obliged to respect the privacy and security of your data.

## **Contact Details**

If you have comments, questions or concerns about any of the information in this Statement, or any other issues relating to the processing of your personal data by CABLE HEATING, please contact our Data Protection Single Point of Contact (“DP SPOC”) [privacy@cable-heating.com](mailto:privacy@cable-heating.com).

In the event you prefer to contact us by post, you can do so on the following address:

Laar 61,3980 Tessenderlo, Belgium

## **Changes to our Privacy Statement**

We may amend or update this Privacy Statement from time to time to reflect changes in our practices with respect to the processing of your personal data, or changes in applicable law. We will be doing this by posting the updated version on this CABLE HEATING website. When we publish changes to our Privacy Statement, we will change the date and version number of the “last update” of our Privacy Statement. Significant changes will be reported on our homepage. Nevertheless, we encourage you to read our Privacy Statement periodically.