



Caractère NV - Privacy notice to clients and third parties - March 2021

Your privacy is important to Caractère NV (see below for full contact details).

We process your personal data in accordance with applicable data protection regulations, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 ("AVG"), as well as this privacy statement.

This privacy notice provides you with more information about what personal data we process, why we process it, how we obtain it, how long we keep it and with whom we share it.

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1. **IDENTITY AND CONTACT DETAILS**

The controller of your personal data is:

Caractère NV
Korte Keppestraat 19
9320 Aalst
VAT number [BE0474874188](#)
RPR: Ghent, Dendermonde division

In case you have any questions, complaints or requests regarding the processing of your personal data, you can always contact us:

- by post: to the address above, marked "Privacy"
- by e-mail: info@caractere.be
- via telephone: 053/630077,

Or, with the Belgian Data Protection Authority [at \[contact@apd-gba.be\]\(mailto:contact@apd-gba.be\)](mailto:contact@apd-gba.be)
<https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>, contact@apd-gba.be or by post (1000 Brussels, Press Street 35).

2. **OVERVIEW**

We process your personal data for one or more of the following purposes:

Browser and session data (website)	
Technical and functional management of the website	Website effectiveness evaluation
Customer management data (including contact details and preferences)	



<i>Organising trips (including customer files, invoicing and coordination of bookings)</i>	<i>Customer service (regarding our trips, before and during)</i>	<i>Evaluation of our trips</i>
Customer data for accounting purposes		
<i>Preparation of internal accounts</i>		
Supplier data for internal organisation		
<i>Recourse to services of external service providers</i>	<i>Invoicing and accounting in this context</i>	
Contact details for communication and (direct) marketing		
<i>Commercial communications on promotions, novelties and actions (including via newsletter, website, social media)</i>		
Data for selection and recruitment		
<i>Applications (including voluntary applications via website, e-mail or telephone)</i>		

3. PURPOSES AND LEGAL BASIS

Below you can find which personal data we process for each type of data, why we process it (purposes), why we are allowed to do so (legal basis), how we obtain it, how long we keep it and with whom we share it (third-party recipients).

Browser and session data (website)

For the purpose of managing and evaluating our website, we collect browser and session data, by setting cookies. Thus we collect: the type of internet browser, capacity of the user, language preference, date and time of your visit, domain name or website through which you reached our website, number of visits, IP address, average time spent on our website and pages visited.

Purposes: This allows us to: manage the website technically and functionally (using essential and functional cookies), evaluate its effectiveness and monitor the browsing behaviour (including website use) of website users (using analytical and marketing cookies).

Legal grounds:

- Our legitimate interest, i.e. providing a safe and well-functioning website (art. 6, §1, (f) AVG);
- Your consent, in particular for the placement of functional, analytical and marketing cookies (art. 6, §1, (a) AVG).

We store this data according to what is provided in our [Cookie Policy](#) (see below).

Third-party recipients: Your data will be communicated to Google Analytics (Google LLC); the written agreements between Caractère NV and Google contain the required standard data protection provisions (in application of Art. 28(3), Art. 46(2)(c) and Art. 46(5) AVG) so that the transfer of your data is accompanied by the necessary safeguards. You can consult these written agreements online on Google's support page or obtain a copy of them from us.

Customer management data (including contact details and

For the purpose of organising our trips, we process, inter alia. the following data, which we obtain directly from the clients or the data subject or, in exceptional cases, via a commercial partner: your personal identification data (name, (business) address, e-mail address, telephone number), identification data issued by the government (identity card number, passport number, driving licence number, VAT number), financial data (bank account number, method of payment), personal characteristics (date of birth, language, nationality) and data about your health (only if these would be relevant for the booking of your trip, e.g. allergies, use of wheelchair). We also process the aforementioned data as regards the staff of our professional clients, legal or natural person.



Purposes: This data allows us to:

- organising trips that meet our customers' expectations and take into account their lifestyles and requirements (including coordination with third parties, monitoring payments, managing bookings),
- be able to provide assistance and support before or during your travels (customer service) where necessary,
- contact with you after your trip, about its follow-up and evaluation, to improve our products and services.

Legal grounds:

- The performance of the contract concluded with our customers (Art. 6, §1, (b) AVG) (in the case of health data, your express consent (Art. 9.2, (a) AVG));
- Our legitimate interest, i.e. the ability to improve our products, services and customer care (art. 6, §1, (f) AVG).

We do not keep your personal data for longer than necessary for the aforementioned processing purposes, without prejudice to your right to erasure (see below).

Third-party recipients: We share this personal data, where appropriate, with hoteliers, airlines, activity organisers, insurance institution, car rental companies and booking engines. In addition, third parties with whom we cooperate for the storage and management of our data also have access to this personal data (IT providers).

Customer data for accounting purposes

For the purpose of creating our internal accounting records, we process, among others, the following data, which we obtain directly from the data subject or, in exceptional cases, through a commercial partner: your personal identification data (name, (business) address, e-mail address, telephone number), government-issued identification data (identity card number, passport number, driving licence number, VAT number), financial data (bank account number, method of payment) and personal characteristics (date of birth, language, nationality).

Purposes: This data allows us to:

- Maintain proper internal accounting records.

Legal grounds:

- Various legal obligations, e.g. in the Economic Law Code (art. I.1 WER, art. III.82 WER, art. III.89 WER and art. III.90 WER), the KB WVV (double-entry bookkeeping), the Companies and Associations Code (art. 3:1 WVV) and the Income Tax Code (art. 320 WIB) (art. 6, §1, (c) AVG).

We do not keep this personal data for longer than necessary for the aforementioned processing purposes.

Third-party recipients: We share this personal data, where appropriate, with government departments, banks and insurance companies, accountants and auditors and external legal advisers. In addition, third parties with whom we cooperate for the storage and management of our data also have access to this personal data (IT providers).

Supplier data for internal organisation

In order to be able to provide our services, we use external service providers, suppliers and conclude cooperation agreements with third parties and keep accurate accounts. Among other things, we process the following personal data of (the staff of) our suppliers: personal identification data (name, e-mail address), (business) address, telephone number, financial data (bank account number, method of payment) and any other information provided to us in the context of the cooperation and/or provision of services.



Purposes: This data allows us to:

- to enter into agreements with suppliers and/or business partners, including comparing suppliers, communicating with suppliers, managing planned trips and organising payment and,
- prepare and/or pay invoices, maintain correct accounting records, file tax returns (and financial statements).

Legal basis:

- Performance of the contract (provision of services or cooperation) (art. 6, §1, (b) AVG);
- Various legal obligations, e.g. in the Economic Law Code (art. I.1 WER, art. III.82 WER, art. III.89 WER and art. III.90 WER), the KB WVV (double-entry bookkeeping), the Companies and Associations Code (art. 3:1 WVV) and the Income Tax Code (art. 320 WIB) (art. 6, §1, (c) AVG).

We obtain this personal data either directly from the data subject or from the supplier, business partner in question.

For our billing and accounting purposes, we keep personal data for up to 7 years plus a verification period of 1 year after the respective financial year. We keep other data for 7 years.

Third-party recipients: We share this personal data, where appropriate, with government departments, banks and insurance companies, accountants and auditors and external legal advisers. In addition, third parties with whom we cooperate for the storage and management of our data also have access to this personal data (IT providers).

Contact details for communication and (direct) marketing

We process personal identification data (name, phone number, address and e-mail address) of existing customers and trade relations for (direct) marketing purposes of similar services and products via e-mails, website, social media and other channels.

Purposes: This data allows us to keep existing customers informed about interesting developments within tourism, send them information about the countries we cooperate with, inform them about our products and services, deliver our Christmas card, et al.

Legal basis:

- Our legitimate interest, i.e. to promote similar products and services to our existing customers (art. 6, §1, (f) AVG);
- For direct marketing to other categories of persons: consent (Art. 6, §1, (a) AVG): with regard to these persons, consent will always be requested prior to the processing of personal data, e.g. when subscribing to our newsletter or after explicit acceptance for other direct marketing initiatives.

We obtain this personal data directly from the data subject.

We do not keep your personal data for longer than necessary for the aforementioned processing purposes, without prejudice to your right to erasure (see below).

Consent for all direct marketing can be withdrawn at any time by informing us at: 053/630077 or by e-mail: info@caractere.be or, if necessary, using the unsubscribe link at the bottom of our newsletter.

The absence or withdrawal of your consent to direct marketing will have no negative impact on our services to you or on your access to our website(tools).



Third-party recipients: We share this personal data with suppliers of software we use to send commercial communications. In addition, third parties with whom we work for the storage and management of our data also have access to this personal data (IT providers).

Data for selection and recruitment

For the purpose of selection and recruitment of new employees, we process, inter alia, the following personal data from job applicants, who provide them to us: personal identification data, name, date of birth, address, telephone number, e-mail address, curriculum vitae and other documents and/or data provided to us in this context.

Purposes: This data allows us to process, manage and, where appropriate, follow up (spontaneous) job applications.

Legal basis:

- Our legitimate interest, i.e. the ability to respond to and follow up incoming job applications (art. 6, §1, (f) AVG).

We will keep this personal data in our recruitment reserve for 1 year for future selections, without prejudice to your right to erasure (see below).

4. SOCIAL MEDIA PLUG-INS

A social media plug-in to Facebook is included on this website to allow you to share pages through your own Facebook profile (purpose of this stage of processing).

Facebook will be joint controllers with us in this case. If you click on these share buttons (method of processing), your personal data, in particular your personal identification data (name, e-mail address) and other data you share will be processed by Facebook.

Read Facebook's privacy statements to see how they handle your personal data and their cookie policy for information on the cookies set there.

5. ACCESS TO YOUR PERSONAL DATA

We will always keep your personal data confidential. Unless required by law or court order, we will not transfer your data to third parties.

We also use the services of third parties (see above), for example for hotel or airline ticket bookings, maintenance and hosting of our website or for marketing campaigns. These third parties thereby sometimes gain access to (certain of) your personal data (set out above, by category of personal data).

We will conclude a processing agreement (as referred to in Art. 28 of the AVG) with these third parties. They hereby guarantee, among other things, to take the necessary technical and organisational measures to adequately protect your personal data and to use your data only for the purposes provided for in this privacy statement.

6. SECURITY

We have implemented appropriate technical and organisational measures to safeguard the confidentiality of your personal data and protect your data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.



7. RIGHTS

You can always contact us to exercise the following rights:

- a request for access or rectification of your personal data;
- a request for erasure of your personal data;
- a request to restrict the processing of your personal data;
- an objection to the processing of your data;
- a request to transfer your data;
- a complaint if you believe we are not acting in accordance with applicable data protection legislation.

You can always contact us for this:

- by post: to the address at the beginning of this privacy notice, marked "Privacy"
- by e-mail: info@caractere.be
- by phone: 053/630077

For identification purposes, we may ask you for a copy of the front of your identity card. We will process your requests in exercise of your rights as soon as possible and at the latest within 5 working days.

If you do not wish to give us consent to process your data and/or withdraw your previous consent to do so, it is possible that:

- you will not be able to access (all) the tools of our website;
- we cannot offer you all our services;
- as a result, we will no longer be able to fulfil (all) our contractual obligations towards you.

8. UPDATES

Caractère SA reserves the right to modify this privacy statement at any time, for example as a result of new tools on our website or to comply with legal, contractual and/or administrative provisions. Important changes will be announced on our website. Please therefore consult our website regularly. You can always access the current version at <http://www.caractere.be/nl/privacyverklaring-gdpr>.

