

# Privacy Policy

This Privacy Policy applies to the website <http://www.itsme.be> (hereafter the Website) operated by Belgian Mobile Wallet SA/NV, whose seat is registered<sup>1</sup> at Place Sainte-Gudule 5, 1000 Brussels, Belgium, under the number 0541.659.084 (hereafter 'Belgian Mobile ID', 'we' or 'us').

The Website has been established to keep the public and visitors thereto (hereafter 'Visitors' or 'you') informed of the Belgian Mobile ID product and services, in particular the Application (hereafter the Belgian Mobile ID App or the App).

Belgian Mobile ID acts as data 'controller' and as such it is responsible for the collection and use of your personal data collected from or through the Website.

The following policy explains the different elements of personal data that will be collected, the purposes of collection, any sharing of that data with third parties, your rights as the data subject and the measures taken to protect your personal data.

## 1. PERSONAL DATA WE COLLECT

As you browse the Website, Belgian Mobile ID will collect the following personal data:

- **Cookies:** this covers data on when you access the Website, any personalized settings, and your browsing behaviour.  
We collect this information through automated means as you browse the Website. You will be asked to consent to the use of cookies through a Cookie Banner. Cookies are necessary to optimize navigation and your browsing experience, for more information see our Cookie Policy.
- **Identification data:** only if you decide to provide identification information on the Website, such as your email address.

All data provided is done so on a voluntary basis. We rely on your consent to process your personal data.

We will only use your data for marketing purposes if and after you expressly consented to it. You can always withdraw consent (see hereunder section 4.3).

Please note that whenever you use our contact facilities, including the helpdesk services linked to the Belgian Mobile ID App and Website, your messages (voice, text or otherwise) and any related technical information (such origin of communication, time and duration of the communication, claimed identities of the participants) may be recorded and stored for a maximum of one month, in order to permit us to evaluate the effectiveness and performance of our contact facilities, and in order to address any attempted unlawful uses of our contact facilities.

## 2. HOW WE USE THE PERSONAL DATA WE COLLECT

We use the personal data you provide:

- To keep you informed of any developments linked to our products and services;
- To respond to any enquiries you may make;
- For direct marketing purposes (only if you agreed to it by ticking the relevant box);
- To evaluate and improve our Website;
- To comply with applicable legal requirements and industry standards;
- To perform auditing, research and analysis in order to maintain, protect and improve our services.

Please bear in mind; we use your data for 2 years starting from when it was originally collected and store all data over a period of ten years maximum for evidentiary purposes. Should we use data for other purposes you will be provided with specific notice at the time of collection.

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<sup>1</sup> The Crossroads Database of Undertakings (*Banque-Carrefour des Entreprises/Kruispuntbank van Ondernemingen*).

### 3. PERSONAL DATA WE SHARE

We do not sell or otherwise disclose the personal data we collect to third parties, except as described in this Privacy Policy or as otherwise disclosed to you at the time of collection.

We may share personal data with affiliates or third parties who perform data processing activities on our behalf. As far as these service providers are acting as data processor, on our behalf, we do not authorize them to use or disclose the data in any way except as specified in this Privacy Policy. We require that these data processors appropriately safeguard the privacy and security of the personal data they process on our behalf.

We may also disclose your personal data: (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or (iv) in connection with an investigation of suspected or actual fraudulent or illegal activity.

We also reserve the right to transfer any personal data in the event we would sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Privacy Policy.

### 4. EXERCISING YOUR RIGHTS

#### 4.1. Access and Rectification

You may exercise your right to access and rectify any of your personal data at any time, in accordance with the Belgian Privacy Act.<sup>2</sup> This can be done by sending a request with a copy of your ID card (passport or other proof of identity) to [privacy@itsme.be](mailto:privacy@itsme.be) or in writing to Belgian Mobile ID SA/NV, Place Sainte-Gudule 5, 1000 Brussels, Belgium.

Please note that cookies can be managed through your web browser. For more information on configuring your cookie preferences see our Cookie Policy.

#### 4.2. Erasure

You may at any time exercise your right to data deletion in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to [privacy@itsme.be](mailto:privacy@itsme.be) or in writing to Belgian Mobile ID SA/NV, Place Sainte-Gudule 5, 1000 Brussels, Belgium. Belgian Mobile ID will refrain from using any of your personal data upon this request and will only continue to store any past personal data for evidentiary purposes over a period of maximum ten years.

#### 4.3. Objection

When visiting the Website you will be requested to consent to certain data processing activities. You have the right to withdraw your consent at all times.

Notably, should you no longer wish to allow your data to be processed for direct marketing purposes; you can always opt-out. Please send your objection, with a copy of your ID card (passport or other proof of identity) to [privacy@itsme.be](mailto:privacy@itsme.be) or in writing to Belgian Mobile ID SA/NV, Place Sainte-Gudule 5, 1000 Brussels, Belgium.

Such withdrawal of consent will not affect the lawfulness of past data processing and it can, however, impact your continued use of the Website. Belgian Mobile ID cannot provide its services without processing necessary elements of your personal data.

At any point, should you deem that any of your rights have not been respected. You may also lodge a complaint with the Belgian Commission for the Protection of Privacy (see [www.privacycommission.be](http://www.privacycommission.be)).

### 5. HOW WE PROTECT PERSONAL DATA

We maintain appropriate administrative, technical and physical safeguards to protect personal data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful forms of processing of the personal data in our possession.

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<sup>2</sup> The Belgian Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data.

The security measures we take vary depending on the type of data processed and how it is collected and/or stored. When you provide personal data online, we use the industry standard for encryption on the Internet – Secure Socket Layer (SSL) technology – to help protect the data that you provide. This Internet encryption standard scrambles data as it travels from your device to our server. We also use digital certificates to ensure that you are connected to authentic channels.

Please note however that usage logs may be kept for a period of maximum ten years from the last time you logged on to the Website.

## **6. DATA TRANSFERS**

We do not transfer any of your personal data outside of the European Union, nor in any manner not specified here above.

## **7. UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically to reflect changes in our personal data practices. We will post a prominent notice on our Website to notify you of any significant changes to our Privacy Policy and indicate at the top of the notice the date at which it was last amended.

## **8. HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us here:

Belgian Mobile ID  
Place Sainte-Gudule 5,  
1000 Brussels,  
Belgium  
Tel.: +32 (0)2 657 32 13  
email: [privacy@itsme.be](mailto:privacy@itsme.be)