

## Privacy & Cookie-policy of Grava (branch of FAIRETAIL bvba)

Last update 17/09/2019

This "Privacy Policy" regulates the processing of your personal data by Grava (branch of FAIRETAIL BVBA), with registered offices in 2800 Mechelen (Belgium), Hendrik Consciencestraat, 1B and with the following Company number : 0809.962.371,

(Hereinafter:"Grava").

Please read this Privacy Policy carefully, because it contains essential information about how your personal data are processed and which cookies are used. By using the website (accessible via the following address: [www.grava.be](http://www.grava.be)), you declare that you have read this Privacy Policy and that you expressly agree to its content as well as to the processing itself.

### Article 1 - General

1.1. Grava complies with the "Law of 8 December 1992 on the protection of privacy with regard to the processing of personal data", as amended by the Law of 11 December 1998 as well as the anti-spam provisions of Book XII of the Belgian Code of Economic Law concerning the " law of the electronic economy ".

1.2. Grava is also compliant with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data. (hereinafter "GDPR")

1.3. When using this website, the person responsible for the processing of your personal data is Grava. A statement was made to the Commission for the Protection of Privacy regarding the processing of your personal data.

### Article 2 - Personal data

#### 2.1. Personal data that you communicate to us:

**Category 1**, without registration: your IP address, surfing behavior, origin and search terms

**Category 2**: your name, surname, e-mail address, phone number, job title and all personal data you include when you send us a message via our contact section;

**Category 3**: when you subscribe to our newsletter: your e-mail address and all personal data you include whilst subscribing;

**Category 4**: via cookies: see category 1;

2.2. Grava can collect data from you (Personal Data) in different ways:

- a. through the use of cookies (see below);
- b. when you provide personal data in order to use the services the Website; (newsletter, contact..)

2.3. The Website also uses cookies that collect a number of personal data. For the provisions regarding the use of cookies, please see article 9.

### **Article 3 - Purposes of the processing**

#### **3.1. General purposes:**

Grava will only use the Personal Data collected by you for the following purposes:

**Category 1:** the maintenance and improvement of this Website and the inclusion of Personal Data in anonymous statistics, from which the identity of specific persons or companies cannot be determined, based on the legitimate interests of Grava to continuously improve its Website and services;

**Category 2:** sending you our newsletters and providing you with targeted advertising with your explicit prior consent as a legal basis;

**Category 3:** Answering the message you send us via our contact section.

**Category 4:** Analyzing our website traffic, facilitating website navigation and serving personalized content on our website, with your explicit prior consent as a legal basis;

You are not obliged to provide us with your Personal Data, but you must understand that the provision of certain services becomes impossible if you refuse the processing.

#### **3.2. Direct marketing:**

The personal data may also be used for direct marketing, provided you have given an additional explicit permission for this ("opt-in").

If you are already included in our mailing list for receiving marketing material in paper and / or electronic form, Grava can use your details for sending marketing and other material with regard to Grava, its products and / or services. Grava can use the information you provide for updating documents saved by Grava.

This permission can be withdrawn at any time, without justification and free of charge, for example by clicking on the appropriate cancellation link at the bottom of each promotional e-mail message.

### **3.3. Transfer to third parties:**

In the event of full or partial reorganization or transfer of activities of Grava, where it reorganises, transfers, ceases its activities or if Grava goes bankrupt, this may mean that your data will be transferred to new entities or third parties through which the business activities of Grava are wholly or partially carried out, transferred.

Grava will reasonably attempt to inform you in advance of the fact that Grava will disclose your information to the said third parties, but you also acknowledge that this is not always technically or commercially feasible under all circumstances.

Grava will not sell your Personal Data, nor rent, distribute or otherwise make commercially available to third parties, except as described above or with your prior consent.

### **3.4. Legal requirements:**

In rare cases, Grava may have to disclose your Personal Data pursuant to a court order or to comply with other mandatory laws or regulations. Grava will reasonably attempt to inform you in advance in this respect, unless this is subject to legal restrictions.

## **Article 4 - Duration of the processing**

The personal data is stored and processed by us for a period that is necessary depending of the Purpose of the processing and in function of any contractual relationship between Grava and You.

For clients, we will delete your personal data if you do not place any order in a period of 5 years;  
For newsletter subscribers, we will keep your personal data until you unsubscribe or ask us to delete your personal data;  
For contact requests via the contact section or forms for a period, we will delete your personal info after 1 year, unless your request requires us to keep your information for a longer period;  
For cookies: we will delete your personal data after 26 months.  
In all other occasions: we will delete your personal data after 6 months, unless the purpose of the data collection requires us to keep the data for a longer period.

## **Article 5 - Your rights**

### **5.1. Right of access and information:**

You have the right to receive free access to your personal data at any time, as well as to be informed of the use we make of your personal data.

## **5.2. Right of improvement, deletion and limitation of the processing:**

You are free to decide not to communicate your personal data to Grava.

You also have the right to request us to correct or delete your personal data.

You acknowledge that in case of refusal of communication or if you request for the removal of personal data, certain services of the Website may not be available.

You may also request to limit the processing of your Personal Data.

## **5.3. Right to object :**

You also have a right of opposition to the processing of your personal data for serious and legitimate reasons.

In addition, you always have the right to oppose the use of your personal data for direct marketing purposes; in such a case you do not have to provide us with reasons for this demand.

## **5.4. Right of data portability :**

You have the right to obtain your Personal Data processed by us in a structured, standard and machine-readable form and / or ask Us to transfer it to other Data controllers.

## **5.5. Right of withdrawal of consent:**

Insofar as the processing is based on your prior consent, you have the right to withdraw that permission.

## **5.6. Exercising your rights:**

You can exercise your rights by contacting us for this purpose, either by e-mail to [privacy@grava.be](mailto:privacy@grava.be) or by post to Grava office: H. Consciencestraat 1B – 2800 Mechelen, and always provide us with a copy of your identity card so that we are able to verify that the demand is coming from you.

## **5.7. Automatic decisions and profiling:**

The processing of your personal data may include profiling and automated decisions but always in accordance to the rules in the GDPR.

## **5.8. Right of complaint:**

You have the right to file a complaint with the Belgian Privacy Commission: Commission for the Protection of Privacy, Rue des Presses 35, 1000 Brussels, Tel +32 (0) 2 274 48 00, Fax +32 (0) 2 274 48 35, e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be).

This right is without prejudice is without prejudice of eventual proceedings if you suffer damage as a result of the processing of your personal data, you can submit a claim for compensation with a civil Court.

## **Article 6 - Security and confidentiality**

6.1. We have developed security measures that are adapted on a technical and organizational level in order to avoid the destruction, loss, falsification, modification, unauthorized access or notification by mistake to third parties of personal data collected as well as any other unauthorized processing of the data.

6.2. Under no circumstances can Grava be held liable for any direct or indirect damage resulting from incorrect or unlawful use by a third party of the personal data.

6.3. When visiting our website, you must comply with the safety regulations at all times, for example by preventing any unauthorized access to your login and code. You are therefore solely responsible for the use made of the Website of Your computer, IP address and your identification data, as well as for the confidentiality thereof.

## **Article 7 - Access by third parties**

7.1. In order to process your personal data, we may grant access to your personal data to our employees and appointees (including processors or sub-processors).

7.2. We guarantee a similar level of protection by making contractual obligations enforceable against these employees and appointees such as required by the GDPR.

## **Article 8 - Privacy commission declaration**

For this processing of personal data, a declaration was made to the Commission for the Protection of Privacy. You can always contact this Commission at the following address:

Commission for the Protection of Privacy  
Drukpersstraat, 35  
1000 Brussels  
+32 (0) 2 274 48 00  
+32 (0) 2 274 48 35  
[commission@privacycommission.be](mailto:commission@privacycommission.be)

## **Article 9 - Cookies**

9.1. What are cookies?

A "cookie" is a small file sent by Grava server and placed on the hard drive of your computer. The information

stored on these cookies can only be read by us and only for the duration of the visit to the Website.

### 9.2. Why do we use cookies?

Our Website uses cookies and similar technologies to distinguish your usage preferences from those of other users of our Website. This helps us to provide you with a better user experience when you visit our Website and also allows us to optimize our Website.

As a result of recent legislative changes, all Websites aimed at certain parts of the European Union are required to request your consent for the use or storage of cookies and similar technologies on your computers or mobile devices. This cookie policy gives you clear and complete information about the cookies we use and their purpose.

### 9.3. Types of cookies:

Although there are different types of cookies, distinguished in terms of functionality, origin or storage period, the legislation mainly distinguishes between functional or technically necessary cookies on the one hand and all other cookies on the other.

The Website only uses following cookies:

#### *Functional cookies*

Name	Origin	Function	Period of storage
Google Analytics	Google	Collecting data and analyzing website traffic, whilst facilitating navigation.	26 months
Google Tag Manager	Google	Collecting data and analyzing website traffic, whilst facilitating navigation.	26 months

#### *Non-functional cookies*

Name	Origin	Function	Period of storage
SharpSpring	SharpSpring	Data collection allowing personalization of our content and/or commercial offering, but always in accordance to the rules in the GDPR.	1 year
Hotjar	Hotjar	Analyzing website traffic to make enhancements, allowing us to offer visitors the best possible experience when visiting our website	6 months

DoubleClick	Google	Collecting data allowing for targeted advertising	6 months
Google Adwords	Google	Collecting data allowing for targeted advertising	6 months
Adform	Adform	Collecting data allowing for targeted advertising	4 months
Facebook	Facebook	Collecting data allowing for targeted advertising	4 months
LinkedIn	LinkedIn	Collecting data allowing for targeted advertising	4 months

For cookies placed by third parties (including Google Analytics) we refer you to the statements that these parties give on their respective websites. Please note: we do not exert any influence on the content of these statements, nor on the content of the cookies of these third parties: Google Analytics cookies.

If you notice that other cookies are being placed via our website, we thank you to notify us immediately, allowing us to take the necessary actions.

#### 9.4. Your permission:

On your first visit to our Website you will be asked to accept our different types of cookies. You can allow or deny category by category of cookies. You can change the cookie settings for our Website at any time via the hyperlink at the bottom of our website and thus revoke your consent.

You can refuse the installation of these cookies by choosing "refuse cookies" when using the Website for the first time in the pop-up window.

You can also refuse or block cookies by changing the configuration parameters of your navigation system. Disabling cookies may mean that you cannot use certain features of the Website.

If you have any further questions or comments regarding the processing of your personal data, please contact us, either by e-mail to [privacy@grava.be](mailto:privacy@grava.be) by post to Grava (address indicated above), or by using the part "Contact us" on the Website.

More information about cookies can also be found at: <http://www.allaboutcookies.org/>

More information on online behavioral advertising and online privacy can be found here: <http://www.youronlinechoices.eu/>

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