

Privacy statement ClickTouch NV

CLICKTOUCH finds the protection of your privacy very important. Consequently, we strive to process your personal data in a legal, honest and transparent manner.

This Privacy Policy applies to the collection, management and use of personal data by ClickTouch NV, with head office at 9890 GAVERE, Legen Heirweg 37.

In this Privacy Policy, we explain which information we collect about you, what we use that information for and who we pass this information on to. This Privacy Policy also explains the rights you have and how you can exercise them.

1. Who do we collect personal data on?

CLICKTOUCH processes personal data on natural persons with whom we have a direct or indirect (usually through their employer) relationship, or with whom we wish to have one in the future.

It concerns data on our current customers, suppliers, clients and employees, but also on potential customers and potential employees.

2. Why do we collect personal data?

CLICKTOUCH collects personal data for the following purposes:

2.1 Delivering our products to customers

We collect personal data to be able to develop and deliver the requested products to our customers.

The manner in which we process personal data may vary, depending on the complexity of the products a customer wishes to purchase.

This processing of personal data is necessary for the execution of our agreement with our client.

2.2 Financial administration

CLICKTOUCH processes personal data in order to maintain its own bookkeeping and invoicing. This concerns identifying data and invoice details.

On the one hand, this processing belongs to the legitimate interest of CLICKTOUCH, especially regarding the possibility to maintain its administration and receive payment for the delivered products, and on the other hand, CLICKTOUCH has a legal obligation to maintain its bookkeeping.

2.3 Maintaining client relations

CLICKTOUCH processes personal data for sending out mailings for our products, for which we think they might be of importance to you.

Sending mailings to our clients is part of our legitimate interest. It is both in your and our interest that our clients are informed of our developments and new products.

2.4 Recruitment purposes

CLICKTOUCH collects personal details to recruit new employees.

This processing finds its legal basis in, on the one hand, permission from the candidate employee and, on the other hand, in our legitimate interest to recruit a suitable candidate for a position.

2.5 Security

If you enter our company, you may be filmed. These camera images are only used for security reasons.

It is part of our legitimate interest to process these details in the framework of securing our employees and clients, as well as the protection of the infrastructure and goods of the company.

2.6 Direct marketing

CLICKTOUCH collect contact details to send out newsletters, information regarding activities and other matters that might be important to you. When collecting this information, explicit, justified and clearly defined purposes are taken into account. We always ensure that the required and/or communicated personal data are adequate, accurate, relevant and not excessive in relation to the intended purposes. In direct marketing, we always provide the possibility to let it know that you no longer want us to use your personal data for commercial purposes.

3. Who do we share your personal data with?

Your data will not be shared with third parties for commercial purposes.

3.1 Your personal data within CLICKTOUCH

Within CLICKTOUCH we take the utmost care with your personal data and only share those data that are necessary to provide you with the best service.

CLICKTOUCH has taken measures to ensure that personal data that are exchanged or shared within CLICKTOUCH remain protected.

3.2 Your personal data outside CLICKTOUCH

Sometimes, we are legally obligated to share your personal data with external parties, especially with the following third parties:

- Public authorities and regulatory institutions where there is a legal obligation to share or disclose client data, such as the tax administration
- Judicial or investigative bodies, such as the police, public prosecution department...

Furthermore, there are third parties whom we are not legally obligated to pass on personal data to, but to which we appeal for some aspects of our business operations.

This implies, among other things, that we are sometimes forced to temporarily transfer data to an external processor for certain tasks and/or services. You may be assured, however, that if we do so, we will always ensure that your data is handled and managed with the necessary confidentiality, in a safe manner and with proper care.

We use social media applications in various applications, such as our website and e-mail signatures. We want to point out that all personal data you share with these social media applications may be read, collected and used for other users of these applications. CLICKTOUCH has little to no control over these other users and can therefore not guarantee that all social media applications adhere to this Privacy Policy.

4. How do we protect your personal data?

CLICKTOUCH has developed several security measures to keep your personal data secure, correct and up-to-date. We specifically endeavor to avoid unauthorized access to or unauthorized modification, disclosure or deletion of personal data we have in our possession.

We have, for example, put in place the necessary firewalls to protect against external access. We ensure that our employees and the people who process your data ("processors") have only the information they need for the execution of their assignment and that they handle data in a secure and confidential manner.

We cannot, however, be held responsible if, in spite of the measures taken in accordance with the applicable legislation, incidents still occur in relation to said processors.

5. How long do we store your personal data?

We do not store personal data longer than necessary for the performance of our activities and provision of our services, unless we are legally obligated to store your personal data longer or because the period in which a legal claim could be exercised is still ongoing.

In any case, your client file is not maintained beyond 10 years after termination of our client relation.

6. What are your rights?

You have several rights with regards to the personal data we process:

6.1 The right to access

As the data subject, you may request access at any time to the data that we process in relation to you. If you wish to exercise your right of access, you can do so via the channels listed below. In order to exercise your right of access/inspection and to prevent any unauthorized disclosure of your personal data, you must provide us with proof of your identity.

6.2 Right to correct

It may happen that certain data that CLICKTOUCH has saved in relation to you are no longer up-to-date/correct. You may therefore ask us at any time to correct or complete that personal data, but you must first provide us with proof of your identity as explained further here.

6.3 Right to data portability

You have the right to request that the personal data you have provided to us be transferred to yourself or directly to a third party. We should point out that the applicable privacy legislation provides for a number of restrictions, with the result that this right of portability does not apply to all data.

6.4 Right of opposition

If you are unhappy with the way in which CLICKTOUCH processes certain personal data, e.g. in the context of direct marketing or profiling, you may object to this. You should contact us via the usual channels shown below. Your objection will be granted unless there is compelling reason not to do so, e.g. legal obligation or performance of the contract.

6.5 Right to have your data deleted

You not only have the right to have incomplete, incorrect, inappropriate or outdated personal data changed, you also have the right to have them removed. Please keep in mind that the applicable privacy legislation provides for a number of exceptions.

6.6 Right to withdraw your permission

You always have the right to withdraw your permission to process your personal data (on the condition that its processing is based on your permission).

6.7 Right to submit complaints

You also have the right to submit a complaint to the Belgian Privacy Commission:

Commissie voor de Bescherming van de Persoonlijke Levenssfeer (Commission for the Protection of Privacy)

Drukpersstraat 35

1000 BRUSSEL

Tel. 02/274.48.00

Fax. 02/274.48.35

commission@privacycommission.be

If you wish to exercise the aforementioned rights, you can contact info@clicktouch.eu. We may ask you to submit proof of identity before granting your request.

7. Use of cookies

We use cookies on the website of CLICKTOUCH. Because your privacy is important to us and we want to make your visit to our website as pleasant as possible, we think it is important that you know how and why we use these cookies.

Cookies are small text files that are stored by your computer or mobile device when you visit our website. These cookies contain information, such as language preference, so that this information does not need to be entered every time you visit the website.

If you want to block cookies, you can do so via your browser settings. Please consult the help page of your browser to find out how to do so.

CLICKTOUCH uses different types of cookies:

- **Functional or necessary cookies:** these cookies ensure that the website function properly. These facilitate and personalise your visit and user experience.
- **Analytical cookies:** Using analytical cookies, we collect information on the use of our website by users with the help of third parties. By measuring and mapping the use of the website, we can improve it and thus optimize its ease of use. For example, the following data are stored: browser features, when and how long you use the website; the pages visited, whether the functionalities are used, etc.



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8. About this Privacy Policy

This privacy statement is subject to change at any time. We therefore encourage you to check our privacy statement regularly. The most recent version can be found at www.clicktouch.eu/privacyverklaring. We will inform you of each important change in the content via the aforementioned link.

Our general terms and conditions and/or the terms and conditions for specific services take precedence over this privacy statement in the event of any inconsistencies.

This version of the privacy statement was last amended on 21TH of mai 2018.

If you have other questions regarding our privacy policy, please contact info@clicktouch.eu.