

Data Collection Information Document

By means of our website, application, or any other platform through which we offer our services and products (collectively referred to as the "**Platform**"), we wish to inform our Platform users about persons, companies, public entities and other legal entities about which our users seek information.

Some of the data on the Platform relates solely to legal persons and is therefore not considered personal data. Other data on the Platform relates to individuals, one-man businesses, self-employed persons, managers and/or administrators or other members of the management of legal persons (each of these persons referred to as a "**Data Subject**" and hereafter also as "**you(r)**" for convenience) and this data therefore qualifies as personal data under applicable legislation.

With this Data Collection Information Document (hereinafter the "**Information Document**"), we want to explain to Data Subjects how we collect and process their personal data. The Information Document also contains further information about our company, how to contact us and your further rights under applicable law.

We truly value your privacy and want to inform Data Subjects in the most transparent way about our processing activities and the rights relating thereto. With this aim in mind, you will first find a concise summary of these processing activities below, followed by more extensive information. In case of further questions, please do not hesitate to contact us.

Please note that the way in which we collect and process information from and about users of our Platform is described in our separate Bizzy [Privacy Statement](#). Please refer to this separate statement for further explanation.

To make this Information Document as clear as possible, it is structured as follows:

- Part A: [Summary of this Information Document](#)
- Part B: [Contact details and information about this Information Document](#)
- Part C: [What data do we collect and process about Data Subjects, and what are the sources of this data?](#)
- Part D: [For what purposes are Data Subjects' data processed, and what is the legal basis for this?](#)
- Part E: [How do we share your data?](#)
- Part F: [Protection, integrity and retention of personal data](#)
- Part G: [Your rights as a Data Subject](#)
- Part H: [Do you still have questions?](#)

Part A: Summary of this Information Document

- We collect data from data subjects related to their professional life. All data come from public sources.
- This data is processed to provide the content on our Platform and to offer our services. The legal basis for this processing is the legitimate interest of our company.
- We make this data available on our Platform and may process it within our company. However, within our company strict agreements and guidelines apply regarding privacy. We may also make this data available to third party processors who provide appropriate guarantees.
- We take reasonable steps to protect personal data and to maintain its integrity.
- Privacy legislation grants each data subject various rights (access, rectification, erasure, etc.) that may be exercised under certain conditions. We take any question raised by a data subject seriously and will promptly verify it and provide the data subject with an answer, within the framework of the legal provisions.

Part B: Contact details and information about this Information Document

1. About us

- 1.1. The Platform is operated by Bizzy Fintech BV with its registered office at Dok-Noord 4D box 101, 9000 Gent, Belgium, RPR Gent and with company number (BE)0770.493.071 (hereinafter "**we**", "**the company**" or "**Bizzy**").
- 1.2. Any questions or comments you may have as a Data Subject can be sent by post to this address or by e-mail to privacy@bizzy.org. All questions regarding privacy or your personal data will be directed to our central contact person for this purpose. We will do our utmost to reply to you as soon as possible.

2. Information about this Information Document

- 2.1. This Information Document informs you about how we collect and process your Personal Data as a Data Subject and make them available to users of our Platform. By means of our Platform, we want to inform our users about persons, companies, public entities and other legal entities about whom our users are seeking information. This information may contain personal data about you as a Data Subject. In the Information Document you will also find further information about our company, how to contact us easily and your further rights under applicable law and how to exercise these rights.
- 2.2. In doing so, we attach the utmost importance to your privacy and the protection of your personal data. Our company, acting as a so-called "(data) controller", will thereby respect Belgian legislation (in particular the Act of 30 July 2018 on the processing of personal data), as well as the European General Data Protection Regulation 2016/679 of 27 April 2016 (also called the GDPR Regulation)
- 2.3. We may amend this Information Document from time to time. We therefore recommend that you check the Information Document regularly, when relevant to you. You will always find the latest revision date at the bottom of the document.

Part C: What data do we collect and process about Data Subjects, and what are the sources of this data?

3. What data do we collect and process about Data Subjects?

3.1. The data that we may collect about Data Subjects can be categorised as follows:

- Data related to you as an individual such as name and location (possibly approximately)
- Professional data such as position, mandates, professional history and professional ratings and scores
- Financial and economic data such as turnover, profits and income related to the legal entity
- Public data such as press articles about the Data Subject, posts by or about the Data Subject on social media, or other public data when related to the legal entity

3.2. In general, we only collect data from you as a Data Subject if it relates to your professional life and the legal entity for which you work or in which you hold a position.

3.3. Of course, we may also receive and process personal data from a Data Subject if you contact us directly as a Data Subject, for example to ask a question. In that case, however, we receive your personal data directly, hence our Bizzy [Privacy Statement](#) will apply.

4. What are the sources of this data?

4.1. The data referred to in article 3.1 are data mainly from public sources which can be consulted by anyone. These sources are:

- The public databases of the national financial regulators and institutions (such as the National Bank of Belgium)
- The public databases of government publications (such as the Official Gazette in Belgium)
- The public databases with basic data of enterprises, public entities and their branch offices (such as the Crossroads Bank for Enterprises in Belgium)
- Websites of or about companies and public entities
- Public press platforms
- Social media platforms
- Job and vacancy sites

4.2. To a limited extent, we may also obtain data from private parties who provide such data. Such data is, in turn, also based on data that can be consulted through public sources.

4.3. Furthermore, it is also important to underline that our visitors and users may also upload information themselves on the Platform about their business. Such uploading of information, which may include information from Data Subjects, should always be done in line with our Bizzy [Terms of Use](#).

Part D: For what purposes are Data Subjects' data processed, and what is the legal basis for this?

5. For what purposes are Data Subjects' data processed?

5.1. The collection and processing of data referred to in article 3.1 are part of our company's purpose to offer our services and products to our Platform users. Indeed, through our Platform we wish to inform our users about persons, companies, public entities and other legal entities about which our user seeks information. This information may contain personal data about you as a Data Subject.

We also use the aforementioned data for the purpose of compiling further information or reports (e.g. scoring, analyses, reports) based on these data, which is done by means of (mathematical) algorithms and models. This is done on the basis of the data made available to us from the sources mentioned in this Information Document.

5.2. If you contact us directly as a Data Subject, in accordance with article 3.3 above, we will process your data in accordance with our Bizzy [Privacy Statement](#). The latter document explains the purposes for which we may process your data, so please refer to that statement in this event.

6. What is the legal basis for the processing of Data Subjects' data?

6.1. The data as referred to in article 3.1 is processed on the basis of the legitimate interest of our company as the data controller. These processing activities enable us to offer the Platform to our users. In doing so, we ensure that your interests and fundamental rights and freedoms as a Data Subject are optimally protected and respected.

6.2. When you contact us directly as a Data Subject, in accordance with article 3.3 above, we process your data pursuant to the legal basis as determined in the category relevant to you as described in the Bizzy [Privacy Statement](#).

Section E: How do we share your data?

7. What data do we share with third parties?

- 7.1. Your personal data is primarily shared with the visitors and users of our Platform. The extent to which these visitors and users can access the information available on our Platform depends on their rights of use. This is further described in the Bizzy [Terms of Use](#).
- 7.2. Within our company, there are also contractual agreements in place which stipulate that access to personal data is limited to those persons who need to have access to it due to their function. In addition, we have internal guidelines within our company that relate to the security and confidentiality of data, including your personal data.
- 7.3. In addition (and notwithstanding the provisions in article 7.1) we do not, as a general rule, transfer personal data to third parties, other than as provided for in the following:
- (a) With competent authorities that are authorised to request such information or to whom we have to disclose information, or when required by law or as a result of legal proceedings or court proceedings, as well as when we deem it necessary in order to safeguard and/or exercise our rights and those of our users, or to protect your interests or the interests of third parties;
 - (b) We may share your data with third party service providers acting as "processors" on behalf of our company, for example a cloud service provider to provide our Platform, IT service provider, the provider of a customer management package, partners with whom we cooperate for the analysis of available data, etc. - in this case we, as a company, will always ensure that we receive the necessary (contractual) guarantees that the service provider in question has taken appropriate measures with regard to privacy (including any transfer of data to countries outside the European Economic Area);
 - (c) With companies within our corporate group, within the framework of offering the Platform;
 - (d) To our professional advisers or service providers, who are bound by confidentiality obligations;
 - (e) In the event of a reorganisation and/or restructuring of our company (e.g. in the event of a takeover, branch demerger, merger, split-off, investment, etc.). In this case, we will also ensure that the acquirer or partner will implement appropriate privacy measures to protect your rights as best as possible.
- 7.4. Without prejudice to the fact that our Platform is internationally accessible (and can therefore be consulted by persons outside Belgium and Europe), we do not generally intend to transfer any Personal Data of Data Subjects in any other way to countries outside the European Economic Area; should this happen, please refer to article 7.3(b) above and we will ensure that appropriate and adequate safeguards are put in place. In this event, you can always obtain a copy of those safeguards by writing to us using the contact details set out in article 1 above or by emailing us at privacy@bizzy.org.

Part F: Protection, integrity and retention of personal data

8. Protection of personal data

- 8.1. We take the security of your personal data very seriously and take appropriate internal and external technical and organisational measures to protect such personal data in a reasonable manner, in order to prevent the destruction, loss, alteration, unauthorised access or disclosure to third parties of personal data relating to Data Subjects. Where your personal data is held by our company, we use computer systems with limited access in locations with physical security measures.
- 8.2. The protection of personal data is periodically reviewed and evaluated within our company and is adjusted to the risk.
- 8.3. To the extent permitted by applicable law, Bizzy disclaims any liability for any direct or indirect loss or damage caused by incorrect, inaccurate or non-updated information about a Data Subject on the Platform or its use by a visitor or user of the Platform or a third party.

9. Integrity of personal data

- 9.1. The data that we collect and process about Data Subjects stems from public sources. Initially, therefore, we cannot verify the accuracy and up-to-date nature of this information.
- 9.2. However, we want to make it as easy as possible for you to have these details rectified if you believe that they are incorrect. If you wish to have your details rectified, you can always contact us by using the contact details set out in article 1 of this Information Document.

10. Retention period of personal data

- 10.1. We will retain your Personal Data for the period necessary to fulfil the purposes set out in this Information Document, namely the provision of our services and products to our Platform users, as described in article 5.1.
- 10.2. In principle, we apply a retention period of twenty (20) years since the termination of the function of the Data Subject within the legal entity to which he or she is related. Upon expiry of this period, all data linked to this function within our system will be deleted.

Part G: Your rights as a Data Subject

11. Your rights

11.1. Privacy legislation sets out a number of legal rights which you, as an individual, can exercise under certain circumstances and conditions.

More specifically this concerns the rights which are described below, and which are further detailed in the relevant article of the European General Data Protection Regulation 2016/679 of 27 April 2016, also referred to as the "**GDPR Regulation**", which you can consult here if you wish: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679&qid=1657612957046>.

- (a) **Right of access:** as a Data Subject, you have the right to obtain from us confirmation as to whether or not personal data relating to you are being processed and, where that is the case, to access such personal data and any supporting information such as the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients of the personal data, the envisaged period for which the personal data is expected to be stored, your rights, any available information as to the source of the data, and the existence of automated decision-making and meaningful information about the logic involved as well as the significance and envisaged consequences of such processing for the data subject. You also have the right to obtain a copy of the information that we process about you. This right is further described in Article 15 of the GDPR Regulation;
- (b) **Right to rectification:** as a Data Subject, you have the right to obtain from the controller (i.e. our company) the rectification without undue delay of any inaccurate personal data relating to you. Taking into account the purposes of the processing, as a Data Subject you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This right is described in Article 16 of the GDPR Regulation;
- (c) **Right to erasure:** as a Data Subject, you have the right to obtain from the controller (i.e. our company) the erasure of personal data relating to you and we are obliged to erase personal data when, among other things, the personal data is no longer necessary in relation to the purposes for which they were collected, you withdraw your consent, you object to the processing in certain circumstances, the personal data has been processed unlawfully, etc. This right is however subject to limitations, but we will always act in line with the law. This right is further described in Article 17 of the GDPR Regulation;
- (d) **Restriction of processing:** as a Data Subject, you have the right, within the limits of the law, to obtain from the controller (i.e. our company) the restriction of processing if one of the following applies: (a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data, (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead, (c) we no longer need the personal data for the processing purposes, but you need it for the establishment, exercise or defence of legal claims, (d) you have objected to the processing, pending the answer to the question of whether the legitimate grounds of the controller outweigh those of the data subject. This right is further described in Article 18 of the GDPR Regulation;

- (e) **Right to object:** as a Data Subject, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you on the basis of our legitimate interests, unless we provide compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims. This right may therefore only be exercised under the conditions laid down by law. This right is further described in Article 21 of the GDPR Regulation;
 - (f) **Right to data portability:** as a Data Subject, you have the right to receive the personal data relating to you that you have provided to us as a data controller, in a structured, commonly used and machine-readable format, and you have the right to transmit such data to another data controller, without hindrance from the data controller to whom the personal data was provided, and this under the conditions set out in the law (the processing is based on consent or on a contract, and the processing is carried out by automated means). This right will generally not apply as we process the data of the Data Subject on another legal basis (see article 6.1 in this Information Document). This right is further described in Article 20 of the GDPR Regulation.
- 11.2. Our company and its employees take all questions regarding privacy seriously and will deal with them promptly. In order to streamline this process, we ask you to email us at privacy@bizzy.org when you request to exercise your rights. You may also contact us in any other way. However, we reserve the right to verify the identity of the person submitting the request, as we obviously need to protect the privacy of third parties as well!
- 11.3. In certain cases, we may refuse requests or may first investigate further and/or request the necessary additional information, for example if they are very unclear or suspicious, endanger the privacy of others, are extremely impractical, etc. In doing so, we always act in line with applicable legislation.
- 11.4. Finally, we wish to point out that when you contact us directly as a Data Subject, in accordance with article 3.3 above, we will process your data in accordance with our Bizzy [Privacy Statement](#). In that document, we also further explain the legal rights you have in that respect.

12. What if you do want to file a complaint?

- 12.1. If you have any complaints or questions, we will of course always prefer to try and find a joint solution first. We will do our utmost to achieve this.
- In any event, you have the right to lodge a complaint with a supervisory authority at any time. In Belgium, the authority involved is the Belgian Data Protection Authority (see www.gegevensbeschermingsautoriteit.be; address: Rue du Palais 35, 1000 Brussels; Telephone: +32 (0)2 274 48 00; E: contact@apd-gba.be).
- 12.2. If you are looking for a supervisory authority outside of Belgium, you can find more information on [this page](#).

Part H: Do you still have questions?

13. Do you have any further questions?

Tell us:

- (a) By post to Bizzy Fintech BV, Dok-Noord 4D box 101, 9000 Gent
- (b) By e-mail to privacy@bizzy.org

All questions concerning privacy or your personal data are handled by our central contact point.

© *Bizzy Fintech BV - Last modified July 2022*