

1. INTRODUCTION

Joseph Rigo (Bow Hunting Spain), with its registered office at Hoevelaan 7, 3740 Bilzen (Belgium), attaches great importance to the safe, transparent, and confidential collection and processing of your personal data. In particular, we aim to protect the data of our clients, subcontractors, and suppliers against risks such as loss, leaks, errors, unauthorized access, or unlawful processing. Through this Data Protection Notice, we aim to inform you about the collection and processing of your personal data. We kindly ask you to read this Data Protection Notice attentively as it contains essential information about how your personal data are processed and for what purposes. By providing your personal data, you expressly acknowledge having read this Data Protection Notice and agree to it, as well as to the processing itself.

2. SCOPE

This Data Protection Notice applies to all services provided by us and, in general, to all activities we carry out.

3. DATA CONTROLLER AND ITS COMMITMENTS

Joseph Rigo (Bow Hunting Spain), with its registered office at Hoevelaan 7, 3740 Bilzen (Belgium) is the data controller of your personal data. In collecting and processing your personal data, we respect Belgian regulations on the protection of personal data, as well as the General Data Protection Regulation ("GDPR") since its entry into force on May 25, 2018.

4. PERSONAL DATA

Depending on your activities and your relationship with our company, you provide us with the following personal data: your identity and contact details (name, title, address, email address, phone and mobile numbers). We would like to remind you that you are responsible for all data you provide to us, and we rely on its accuracy. If your data are no longer up-to-date, we request that you inform us promptly. While you are not obliged to provide your personal data, you understand that providing certain services or collaborating becomes impossible if you do not consent to their collection and processing.

5. PROCESSING PURPOSES AND LEGAL BASIS

5.1 CUSTOMER DATA

As part of our services and activities, we collect and process the identity and contact details of our clients and contractors, their staff, employees, agents, and other useful contacts. The purposes of these processing activities include the execution of agreements with our clients, customer management, accounting, and direct marketing activities such as sending promotional or commercial information. The legal bases are the execution of the agreement, compliance with legal and regulatory obligations (such as, for example, the 30bis declaration of works), and/or our legitimate interests.

5.2 SUPPLIER AND SUBCONTRACTOR DATA

We collect and process the identity and contact details of our suppliers and subcontractors, as well as their potential (sub) subcontractor(s), their staff, employees, agents, and other useful contacts. The purposes of these processing activities include the execution of these agreements, the management of suppliers/subcontractors, accounting, and direct marketing activities such as sending promotional or commercial information. The legal bases are the execution of the agreement, compliance with legal and regulatory obligations (such as, for example, the mandatory electronic attendance registration, the 30bis declaration of works, the attendance list, or other obligations in public procurement), and/or our legitimate interests (such as for direct marketing). For direct marketing activities by email (such as a newsletter or event invitation), consent will always be requested, and it can also be revoked at any time.

5.3 EMPLOYEE DATA

We process the personal data of our employees as part of our personnel management and payroll administration. Given its specific nature, this processing is more extensively regulated in an Employee Data Protection Policy.

5.4 OTHER DATA

In addition to the data of clients, suppliers/subcontractors, and employees, we also process personal data of others, such as potential new clients/prospects, useful contacts within our industry, network contacts, contacts of experts, etc. The purposes of these processing activities are in the interest of our activities, direct marketing, and public relations. The legal basis is our legitimate interest or, in some cases, the execution of an agreement.

6. PROCESSING DURATION

The personal data are stored and processed by us for a period necessary for the purposes of the processing and in relation to the (contractual) relationship we have with you. Client data and data of suppliers or subcontractors will in any case be deleted from our systems after a period of 1 month following the termination of the agreement or the project, except for those personal data that we are required to keep longer based on specific legislation or in case of an ongoing dispute for which the personal data are still necessary.

7. RIGHTS

In accordance with and subject to the conditions of Belgian privacy legislation and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- Right of access and inspection: you have the right to obtain free access to the data we hold about you and to find out how they are used.
- Right to rectification: you have the right to obtain rectification (correction) of your inaccurate personal data, as well as to complete incomplete personal data.

- **Right to erasure or restriction:** you have the right to request the erasure of your personal data or the restriction of its processing under the circumstances and conditions provided by the General Data Protection Regulation. We may refuse the erasure or restriction of any personal data that is necessary for us to perform a legal obligation, execute the agreement, or pursue our legitimate interests, as long as this data is necessary for the purposes for which it was collected.

- **Right to data portability:** you have the right to receive the personal data you provided to us in a structured, commonly used, and machine-readable format. You have the right to transfer this data to another data controller.

- **Right to object:** you have the right to object to the processing of your personal data for compelling and legitimate reasons. Please note that you cannot object to the processing of personal data that is necessary for us to perform a legal obligation, execute the agreement, or pursue our legitimate interests, as long as this data is necessary for the purposes for which it was collected.

- **Right to withdraw consent:** if the processing of personal data is based on your prior consent, you have the right to withdraw this consent. These personal data will only be processed if we have another legal basis for doing so.

- **Automated decisions and profiling:** we confirm that the processing of personal data does not include profiling, and you are not subject to fully automated decisions.

You can exercise the aforementioned rights by contacting us at info@bowhuntingSpain.com. We make every effort to handle your personal data carefully and legitimately in accordance with applicable regulations. However, if you believe that your rights have been violated and you do not receive a satisfactory response within our company, you are free to file a complaint with:

Data Protection Authority
Drukpersstraat 35, 1000 Brussels
phone: 02 274 48 00
Fax: 02 274 48 35

Email: commission@privacycommission.be

You may also address a court if you believe that you would suffer damage as a result of the processing of your personal data.

8. DISCLOSURE TO THIRD PARTIES

Certain personal data collected by us will be transferred to and may be processed by third-party service providers, such as our IT provider, accountant, auditor, as well as by the government (for example, in the 30bis declaration of works, electronic attendance registration, or participation in public procurement).

It is possible that one or more of the aforementioned third parties are located outside the European Economic Area ("EEA"). However, personal data will only be transferred to third countries with an adequate level of protection.

The employees, managers, and/or representatives of the aforementioned service providers or institutions, and the specialized service providers appointed by them, must respect the confidential nature of your personal data and we only use this data for the purposes for which it was provided. If necessary, your personal data may be transferred to other third parties. This may be the case, for example, if we were to be entirely or partially reorganized, if our activities were to be transferred, or if we were declared bankrupt. It is also possible that personal data must be transferred following a court order or to comply with a specific legal obligation. In such cases, we will make reasonable efforts to inform you in advance of this communication to other third parties. However, you acknowledge and understand that in certain circumstances, this may not always be technically or commercially feasible, or there may be legal limitations.

Under no circumstances will we sell your personal data or make it commercially available to direct marketing agencies or similar service providers without your prior consent.

9. TECHNICAL AND ORGANIZATIONAL MEASURES

We take the necessary technical and organizational measures to process your personal data at an appropriate level of security and to protect it against destruction, loss, forgery, alteration, unauthorized access, or notification to third parties by mistake, as well as any other unauthorized processing of this data.

In no event shall Joseph Rigo (Bow Hunting Spain) be liable for any director indirect damage resulting from incorrect or unlawful use of personal data by a third party.

10. ACCESS BY THIRD PARTIES

In order to process your personal data, we grant access to your personal data to our employees, collaborators, and agents. We guarantee a similar level of protection by making contractual obligations enforceable against these employees, collaborators, and agents, which are similar to this Data Protection Notice.

11. FURTHER QUESTIONS?

If, after reading this Data Protection Notice, you have further questions or comments regarding the collection and processing of your personal data, you can contact Joseph Rigo (Bow Hunting Spain) either by post at Hoevelaan 7, 3740 Bilzen (Belgium) or by email at info@bowhuntingSpain.com