

# PRIVACY POLICY

This Privacy Policy governs the processing of your personal data by Delta Water Engineering (hereinafter: "Delta", "We", "Our") when you:

- Visit or use our website <https://testing.pwg.be/deltaapp/> (hereinafter generally referred to as: "Website") and/or disclose personal data (for example by filling in the contact form, sending an e-mail, making a telephone contact, etc.);
- Use our products or services in any other way;
- Wish to communicate with us via e-mail, telephone, fax and social media;
- Wish to communicate with us at fairs and events;
- Explicitly accept this privacy policy.

Below you can find an overview of answers to the most important questions about the processing of your personal data by Delta.

## The identity of the controller and who is protected by the privacy policy

Delta is located at Waesdonckstraat 1, 2640 Mortsel and is registered in the CBE under the number 863.958.709. Delta acts as controller within the meaning of privacy legislation and in this capacity we want to inform you about the processing of personal data.

This Privacy Policy therefore only applies to the personal data that Delta processes as controller. You can address your questions regarding the processing of your personal data to our Privacy Manager via [privacy@boekan.be](mailto:privacy@boekan.be).

## What personal data does Delta process?

Delta processes personal data that are relevant or necessary for the purposes for which they are processed.

Personal data is all data that identifies you or makes you identifiable as a natural person.

An identifiable natural person is one who can be identified, directly or indirectly, by reference to the personal data processed.

Delta processes different categories of data depending on the purpose of the processing:

- Identification or contact details such as your first and last name, address, telephone number, e-mail address, electronic identification data such as your public IP address, cookies;
- Characteristics of the assignments, orders or specific interest you have;
- Business and/or billing information.

Specifically and depending on the marketing tools used by us, the following personal data are processed:

<b>Tool / Service</b>	<b>Type of personal data</b>
Enhanced Conversions	Names, email addresses, phone numbers, addresses, customer identifiers, online identifiers, internet protocol addresses
Google Ads Customer Match	Names, email addresses, phone numbers, addresses, customer identifiers
Google Analytics	Online identifiers such as cookie identifiers, internet protocol addresses and device identifiers; customer identifiers
Google Data Studio	Data related to individuals to create reports, charts and diagrams
Google Optimize	Online identifiers such as cookie identifiers and internet protocol addresses
Google Tag Manager	Online identifiers such as cookie identifiers and internet protocol addresses
Facebook Ads Custom Audiences	Email addresses, phone numbers, addresses
HotJar	Online identifiers such as cookie identifiers and internet protocol addresses
CRM	Names, email addresses, phone numbers, addresses, customer identifiers, online identifiers, internet protocol addresses

## For what purposes does Delta process your personal data?

We process your personal data for the following purposes:

- To contact you if you wish to purchase goods or services from us or to answer your general questions through various ways in which you can contact us (store visit, event, fair, mail, social media, etc.);
- To make orders and deliveries run smoothly when you purchase a product or purchase a service;
- In the context of our daily business operations related to our legal obligations: to manage our accounting, customer management, dispute management, supplier management, public relations, insurance management, etc.;
- As part of our recruitment policy. If you submit your application for a vacancy at Delta, we will process your data at your request for the possible conclusion of an employment contract;
- To perform statistical analysis in order to improve our Website, products and services or to develop new products and services;
- To share your personal data on our Website or social media;
- For marketing purposes, i.e. to provide you with targeted communications, promotions, offers and other advertisements from Delta and selected partners.

Unless you are an existing customer who has already purchased similar goods or services from us and we want to focus on with our own marketing material, Delta will only send you communications, promotions, offers, newsletters and other advertisements via email or other electronic

communication channels from person to person, only if you have explicitly consented to the receipt of such communications, offers, newsletters and other advertisements.

## Basis for the processing of your personal data

We process your personal data on the basis of the following legal grounds:

- Because of our legal obligations;
- Due to the execution of the agreement you enter into with us or the pre-contractual steps taken by you during your request;
- Due to the legitimate interest we can assert to help you with our products and services;
- Because of the explicit consent given by you.

## Do we share your personal data with third parties?

Your personal data are mainly processed for internal use.

Delta will never sell your personal data or make it available to third parties for commercial purposes.

We will always ask your prior consent to transfer data to third parties with the exception of the transfers necessary for the execution of legal obligations, if you already have information related to the transfer or if the personal data must remain confidential in the context of a professional secret.

Although processors are not eligible as third parties, we would like to inform you that Delta relies on processors with which we exchange personal data such as contractors, ICT service providers, communication agencies, etc. For this purpose, we ensure by means of processor agreements that the processors who process your personal data on our behalf always do so in compliance with the privacy legislation and only for the purposes explained above. Delta will verify that the processors will process the personal data in a safe, fair, lawful and proportionate manner.

In the event that the processors invoked by Delta process personal data outside the European Economic Area (EEA), Delta will ensure, in accordance with privacy legislation, through contractual or other measures, that these data enjoy an adequate level of protection there comparable to the protection they would enjoy in the EEA.

If necessary for its day-to-day business and always in compliance with privacy legislation, Delta will also share personal data with parties such as lawyers and collection agencies, banks and insurance companies.

## What techniques do we use to protect the privacy of your personal data?

Delta takes the necessary technical and organizational measures to protect your privacy.

We take various technical measures to protect the personal data we process against unauthorized access or modification, disclosure and destruction, as well as loss and theft such as: password protection, data encryption, firewalls, antivirus, logging and monitoring of our systems, access control, ICT software, where required and possible we will anonymise the personal data, etc.

Delta takes organisational measures to protect your personal data, such as designating a responsible privacy; employing employees who ensure the security of our network, infrastructure and information systems; measures to manage physical access to our offices; our employees only have access to those personal data that are necessary for the performance of their tasks and are trained to perform their tasks with respect to your privacy at all times; we implement the privacy legislation in our business processes, procedures and work instructions.

These measures are regularly reviewed and updated by subjecting them to internal and external audits.

Despite these security measures taken, it may still happen that third parties manage to circumvent these measures and obtain and/or use your personal data unlawfully. We cannot be held liable for this in any way and are therefore in no way liable for any unlawful use of your personal data that is made by third parties.

## How long do we store your personal data?

Delta stores your personal data:

- as long as necessary or relevant for the above processing purposes;
- for the duration we are legally obliged to do (e.g. in the context of warranty, accounting or labour law obligations);
- as long as a contractual relationship is ongoing;
- as long as there may be a legal dispute or investigations regarding the services or products provided by us.

We will handle your personal data in accordance with this Privacy Policy as long as we retain it.

## What rights do you have regarding the processing of your personal data?

In accordance with privacy legislation, you have certain rights with regard to the processing of your personal data. Below you can find an overview of these rights.

### **Right to information and inspection**

You have the right to be informed whether Delta processes your personal data and when this is the case, to obtain access to that personal data and the following information:

- the processing purposes;
- the categories of personal data concerned;
- the recipients or categories of recipients (in particular recipients in third countries);
- where possible, the retention period or, if this is not possible, the criteria for determining that period;
- the right to lodge a complaint with the supervisory authority;

- the information about the source of the data if we obtain personal data through a third party;
- the existence of automated decision making including profiling.

You have the right to request a free copy of your personal data in a common form. If you request additional copies, Delta may charge a reasonable fee to cover the administrative costs.

### **Right to rectification**

You have the right to ask Delta to complete or correct incomplete or inaccurate personal data processed by Delta.

### **Right to erasure ("right to be forgotten")**

You have the right to have your personal data deleted by Delta in the following cases, and without unreasonable delay:

- your personal data are no longer necessary for the purposes for which they were collected or otherwise processed by Delta;
- you withdraw your previous consent for the processing and there is no other legal basis on which Delta can rely for the (further) processing;
- you object to the processing of your personal data and there are no other grounds for the (further) processing by Delta;
- your personal data are processed unlawfully;
- your personal data must be erased in order to comply with a legal obligation;
- your personal data were collected when you were a minor.

In some cases, we will not be able to comply with your request for data erasure, for example when the processing is necessary for the establishment, exercise or defence of legal claims or because the processing of these personal data is necessary for compliance with legal obligations. We will inform you about this in our response to your request for data deletion.

Specifically with regard to the deletion of your data in Google Analytics, we also ask you to provide us with the following data:

- time of visit
- place of visit
- date of visit

### **Right to restrict processing**

You have the right to request the restriction of the processing of your personal data if one of the following elements applies:

- you dispute the accuracy of these personal data: their use is limited for a period during which Delta will verify the accuracy of the data;

- the processing of your personal data is unlawful: instead of erasing your data, you request to limit their use;
- Delta no longer needs your data for the original processing purposes, but you need them for the establishment, exercise or substantiation of a legal claim: instead of erasing your data, their use is restricted for the establishment, exercise or substantiation of the legal claim;
- as long as no decision has been taken on the exercise of your right to object to the processing, you request to restrict the use of your personal data.

### **Right to transferability of personal data**

You have the right to request Delta to obtain your personal data in a structured, commonly used and machine-readable form and the right to transfer that data to another controller. You can ask us to transfer the data directly to the other controller unless this is technically not possible.

This right is only valid for the personal data that you have provided to Delta on the basis of your consent or for the execution of an agreement and where the processing is carried out via automated processes.

### **Right of objection and automated individual decision-making**

You have the right to object to the processing of your personal data if you are in a special and specific situation that justifies such opposition.

Delta will cease processing your personal data unless it can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms or the processing of your personal data is related to the establishment, exercise or defence of legal claims.

You have the right not to be subject to a decision based on processing that was exclusively automated, including profiling. This right does not apply to the following cases: when profiling or automated individual decision-making is permitted by a legal provision that also provides for appropriate measures to protect your rights and freedoms; when this is necessary for the conclusion or execution of an agreement; when this is based on your express consent.

## **How can you exercise your rights?**

You can contact us for more information about the Privacy Policy or in connection with the exercise of your rights via the following details:

By a letter addressed to BOEKAN NV, Brouwerijstraat 14, 8680 Koekelare;

Via e-mail to: [privacy@boekank.be](mailto:privacy@boekank.be).

If you wish to exercise any of the above rights, you must provide us with proof of identity (such as a copy of the identity card) or a proxy obtained.

As soon as we receive a complaint via the above channels, you will receive a confirmation of receipt. Your request will then be processed within a reasonable period.

## Right to complain to a supervisory authority

If you have certain complaints about the processing of your personal data, we thank you for contacting us directly first via one of the above mentioned contact channels, so that we can solve this for you.

Furthermore, you always have the right to lodge a complaint with the supervisory authority.

The supervisory authority in Belgium is the Data Protection Authority (DPA). Their contact details are:

Data Protection Authority (DPA):  
Drukpersstraat 35  
1000 Brussel  
Telephone number +32 (0)2 274 48 00  
contact@apd-gba.be  
www.gegevensbeschermingsautoriteit.be

Flemish Supervisory Committee for the processing of personal data:  
Koning Albert II Laan 15  
Brussel 1210  
Telephone number +32 (0)2 553 20 85  
contact@toezichtcommissie.be  
<https://overheid.vlaanderen.be/vlaamse-toezichtcommissie>

If you want to file a complaint about the processing of your personal data, you can find the form here:

<https://overheid.vlaanderen.be/digitale-overheid/klachtenprocedure>  
<https://overheid.vlaanderen.be/vlaamse-toezichtcommissie>

## Which cookies do we use?

When you visit our Website, it is possible that certain cookies are placed on your device during the use of the Website. More information can be found in our Cookie Policy.

## How are changes to the current privacy policy made?

Delta's Privacy Policy is amended from time to time, for example because of changes to our products/services that affect the processing of personal data.

We will post any changes to this Privacy Policy and the latest version on our Website.

Use of cookies – see the **cookie disclaimer**