



## Privacy policy

### Aim

This Policy was drawn up by Jeux d'Hiver s.a. located at **Chemin du croquet 1, 1000 Brussels**, registered under number: **BCE 0673 729 732** (hereinafter called '*the data controller*').

The aim of this policy is to inform visitors of the website at the following address: [www.jeuxdhiver.be](http://www.jeuxdhiver.be) (hereinafter called '*website*') about the way data are collected and processed by the data controller.

This policy is written in accordance with the data controller's aim to act in total transparency, in accordance with the national rules and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter called the 'General Data Protection Regulation').

The data controller aims to carefully protect the privacy of its users and undertakes to implement any reasonable measures required to protect the personal data collected against loss, theft, disclosure and unauthorised use.

'Personal data' are defined as all personal data about the user, i.e. any information that could directly or indirectly identify him as a natural person.

Users with comments about the practices described below should contact the data controller at the postal address or email address listed under 'Contact details' in this policy.

### What kind of data do we collect?

The data controller collects and processes the following personal data, according to the methods and principles outlined below:

- domain (automatically detected by the data controller's server), including the dynamic IP address;
- the user's email address if previously provided, for example by sending messages or questions about the website, by sending email communications to the data controller, by taking part in discussion forums, by logging in to the restricted part of the website, etc. ;
- all information about the pages the user has visited on the website;
- any information the user has provided voluntarily, for example as part of surveys and/or website registrations or by logging into the restricted part of the website.

We also collect the following data:

- Behavioural data

The data controller may also have to collect non-personal data. These data are characterised as non-personal data because they do not allow us to directly or indirectly identify any specific persons. They may therefore be used for any purpose whatsoever, for example to improve the website, the products and services offered or the publications of the data controller.

In cases where non-personal data are combined with personal data, and the data subjects may be identified as a result, these data shall be treated as personal data until they can no longer be linked to a particular person.

### **Collection methods**

The data controller uses the following methods to collect personal data:

- Google Analytics cookies
- Hotjar cookies
- HubSpot cookies

### **Processing objectives**

The personal data are only collected and processed to fulfil the objectives listed below:

- to manage and control the provision of the offered services;
- to send and follow up on orders and invoices;
- to send promotional information on the products and services of the data controller;
- to send promotional material;
- to answer the user's questions;
- to compile statistics;
- to improve the quality of the website and the products and/or services provided by the data controller;
- to send information about the new products and/or services of the data controller;
- for commercial prospection activities;
- to better identify the user's areas of interest.

The data controller may have to process data in a way that has not yet been described in this Policy. If this is the case, he will contact the user before reusing his personal data to inform him of the changes and to allow him to refuse the reuse of his data, if applicable.

### **Legitimate interests**

Some types of processing arise from the legal basis of the legitimate interests of the data controller. These legitimate interests are proportionate to the rights and obligations of the user. For more details about the objectives arising from the legal basis of these legitimate interests, the user should contact the data controller (see the section about 'Contact details').

### **Retention period**

The data controller generally only retains personal data for the time reasonably necessary to obtain the objectives and in accordance with the legal and regulatory requirements.

The client's personal data are kept for no more than 10 years after the end of the contractual relationship that links the client to the data controller.

After the retention period, the data controller will do everything in his power to ensure the personal data are no longer available or accessible.

## **Exercising rights**

The data controller reserves the right to verify the identity of the user before allowing them to exercise the rights listed below.

This additional information request shall be sent no later than one month after the user sent their request.

## **Data access and copies**

The user may obtain the written communication or a copy of the personal data that have been collected about him free of charge.

The data controller may charge a reasonable price for each additional copy requested by the user based on the administrative costs incurred.

If the user sends his request by email, the information shall be supplied in a commonly used digital format, unless the user requests otherwise.

Unless otherwise specified in the General Data Protection Regulation, the user shall receive a copy of his data no later than one month after receipt of the request.

## **Right to rectification**

The user has the right to rectify any incorrect, incomplete or irrelevant personal data as well as to complete them if they are incomplete, as soon as possible or no later than within one month.

Unless otherwise specified in the General Data Protection Regulation, the request to exercise the right to rectification shall be processed in the same month as it was submitted.

## **Right to object to the processing**

The user may freely object to the processing of his personal data, at any time and for any reason pertaining to his personal situation, unless:

- the processing is necessary for a task carried out in the public interest or pertaining to the exercise of public authority vested in the data controller;
- the processing is necessary for the legitimate interests of the data controller or a third party, unless the interests and fundamental rights and liberties of the data subject who requires protection of his personal data prevail (especially if the data subject is a child).

The data controller may refuse to implement the user's right to object, if he establishes that there are compelling and legitimate reasons for the processing, which take precedence over the user's interests and rights and liberties or to establish, exercise or defend a legal right. In the event of a dispute, the user may lodge an appeal in accordance with the 'Complaints' section of this Policy.

The user may also object freely and without providing reasons at any time against the processing of his personal data about him if these data are collected for commercial purposes (including profiling).

If the personal data are processed for scientific or historical research purposes or for statistical purposes in accordance with the General Data Protection Regulation, the user has the right to object to the processing of his personal data, for reasons pertaining to his individual situation, unless the processing is necessary for a task carried out in the public interest.

Unless otherwise specified in the General Data Protection Regulation, the data controller is obligated to respond to the user's request as soon as possible or no later than within one month and if they do not intend to honour the request, to justify his response.

### **Right to restrict processing**

The user may have the processing of his personal data restricted in the cases listed below:

- if the user contests the correctness of some data and only if the data controller can check this;
- if the processing is unlawful and the user prefers to restrict it rather than erase the data;
- if the user needs this to establish, exercise or defend his legal rights, but only if the data are no longer necessary to achieve the processing objectives;
- for the time necessary to investigate whether an objection submitted by the user is justified, in other words the time the data controller needs to weigh the legitimate interests of the data controller against those of the user.

The data controller shall inform the user when the processing restriction has been lifted.

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

The user may have the personal data about him erased for one of the following reasons:

- the data are no longer necessary for the processing objectives;
- the user has withdrawn his consent for his personal data to be processed and there is no other legal basis for the processing;
- the user objects to the treatment and there is no legitimate compelling reason for the processing and/or the user exercises his specific right to object to direct marketing material (including profiling);
- the personal data have been processed unlawfully;
- the personal data must be erased to fulfil a legal obligation (EU law or law of the relevant member state) the data controller is subject to;
- the personal data was collected as part of information society services aimed at children.

Erasure of data does not apply in the following cases, however:

- if processing is necessary to exercise the right to freedom of expression and information;
- if processing is necessary to fulfil a legal obligation that requires processing under EU law or the law of the member state the data controller is a subject of, or to carry out an act of public interest or pertaining to the public authority vested in the data controller;
- where the processing is necessary for reasons of public interest in the field of public health;
- if processing is necessary for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes and insofar as the right to erasure is likely to render it impossible to achieve or seriously compromise the processing objectives in question;
- if processing is necessary to establish, exercise or defend legal rights.

Unless otherwise specified in the General Data Protection Regulation, the data controller is obligated to respond to the user's request as soon as possible or no later than within one month and if they do not intend to honour the request, to justify his response.

### **Right to 'data portability'**

The user may request at any moment to receive his personal data free of charge in a commonly used, machine-readable, structured format, in particular with a view to transfer them to another data controller, if:

- the data are processed by means of automatic processes; and if
- processing is based on the user's consent or on an agreement entered into between the latter and the data controller.

Under the same terms and conditions, the user has the right to have the data controller transfer the personal data in question directly to another data controller of personal data, if this is technically possible.

The right to data portability does not apply if the processing is necessary for a task carried out in the public interest or pertaining to the exercise of public authority vested in the data controller.

### **Data recipients and third-party disclosure**

The recipients of the collected and processed data, other than the data controller himself, are his employees or other subcontractors, carefully selected commercial partners, located in the European Union, who work with the data controller to sell products or provide services.

If the data are disclosed to third parties for direct marketing or commercial prospection purposes, the user shall be informed of this in advance and given the choice whether he wants to consent to the transfer of his data to third parties.

If the transfer is based on the user's consent, he can withdraw his consent for that exact purpose at any time.

The data controller complies with the legal regulatory provisions in force and shall ensure in all cases that his partners, employees, subcontractors or other third parties who have access to the personal data comply with this Policy.

The data controller shall disclose the user's personal data if this disclosure becomes necessary by law, by order of a public authority or as a result of a legal procedure.

The data controller shall not transfer any personal data outside of the European Union.

### **Protection**

The data controller shall implement appropriate technical and organisational measures to ensure a level of protection for the processing and the collected data in line with the risk posed by the processing and the nature of the protected data. This will take into account the current state of knowledge, the implementation costs and the nature, scope, context and purposes of the processing as well as the risks posed to the users' rights and liberties.

The data controller always uses encoding technology that is considered the industry standard in the IT sector when transferring or receiving data on the website.

The data controller has implemented appropriate security measures to protect the information received on the website and to prevent its loss, misuse or modification.

If the personal data that the data controller manages are compromised, he will try to identify the cause of this breach as soon as possible and will take appropriate remedial measures.

The data controller will inform the user of this incident if he is obligated to do so by law.

### **Complaints**

If the user has any comments about one of the practices described in this Policy, they should contact the data controller directly.

The user may also file a complaint with his national supervisory body. Their contact details can be found on the official website of the European Commission:  
[http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

The user also has the option to file a complaint with the competent national courts.

### **Contact details**

The user should contact the data controller for any questions and/or complaints relating to this Policy:

By email: [info@jeuxdhiver.be](mailto:info@jeuxdhiver.be).

By post: Chemin du croquet 1, B-1000 Brussels, Belgium.

### **Modification**

The data controller reserves the right to modify the provisions of this Policy at any time. These modifications are published directly on the data controller's website.

### **Applicable law and competent court**

This Policy is governed by the national law of the main location of the data controller.

Any disputes arising from the interpretation or execution of this Policy shall be subject to the courts under this national law.

This version of the Policy is dated 01/07/2019.