

## **CORDEEL GROUP DATA PROTECTION STATEMENT**

### **1 INTRODUCTION**

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Cordeel Group, comprising all the companies listed in Appendix 1 'Cordeel Group Companies' (all of which are separate and independent legal entities), aims to provide you with the best possible service and to carry out its activities to the highest standard. To this end, we may need to process your personal data in certain circumstances.

As joint data controllers for your personal data, all companies listed in Appendix 1 'Cordeel Group Companies' are committed to safeguarding your privacy and therefore handle your data with the utmost care. We attach great importance to the secure, transparent and confidential collection and processing of personal data. We give high priority to protecting the data of parties such as our customers, subcontractors, suppliers and website visitors against, amongst other things, loss, leaks, errors, unauthorised access and unlawful processing.

Through this data protection notice, we inform you about the collection and processing of your personal data.

Please read this data protection notice carefully, as it contains essential information about how your personal data is processed and for what purpose.

By sharing your personal data, you expressly confirm that you have read this data protection notice and that you consent to its terms, including the processing of the data.

### **2 SCOPE**

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This Privacy Policy applies to all the services we provide and, more generally, to all the activities we carry out.

### **3 JOINT CONTROLLERS**

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All companies as described in Appendix 1 'Affiliated companies of the Cordeel Group' are joint controllers for the processing of your personal data. Your personal data may be shared with other companies within the Cordeel Group, as well as with its affiliated and associated companies within the meaning of Articles 1:20 and 1:21 of the Companies and Associations Code, for administrative, operational, HR, IT, compliance and other legitimate business purposes.

In accordance with Article 26 of the GDPR, we confirm that the arrangement between the entities is such that each entity remains, in principle, responsible for the data it receives and processes. Data

subjects may, however, exercise their rights vis-à-vis any of the data controllers via a single central point of contact: [gdpr@cordeel.eu](mailto:gdpr@cordeel.eu).

## 4 PERSONAL DATA

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When collecting and processing your personal data, we comply with Belgian data protection legislation and the General Data Protection Regulation (GDPR), which came into force on 25 May 2018.

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, telephone and mobile numbers),... For specific legal obligations (electronic attendance registration, Article 30bis declaration of works), you may need to provide us with additional information to record your attendance (such as E-ID details, Limosa number).

We would like to point out that you are responsible for all information you provide to us and that we rely on its accuracy. Should your details no longer be up to date, please inform us immediately.

Although you are not obliged to provide your personal data, you understand that the provision of certain services or collaboration will not be possible if you do not consent to this data being collected and processed.

### Image rights

To protect our goods and facilities and to ensure general safety, some (construction) sites are equipped with fixed CCTV cameras and/or drones. These images are for internal use only and will be forwarded to the authorities in the event of theft, vandalism or a potential accident. At no time are images of individuals used for external or commercial purposes. For marketing purposes, some construction sites or buildings are equipped with time-lapse cameras that show the progress of the construction site. Upon publication, great care is taken to ensure that no individuals are recognisable in the video or photograph.

## 5 PURPOSES OF PROCESSING AND LEGAL BASIS

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### 5.1 Client data

As part of our services and activities, we collect and process the identity and contact details of our clients and their staff, as well as appointees and other relevant contacts. This processing is carried out for the purposes of fulfilling contracts with our clients, client management, accounting, organising work schedules, as well as managing any disputes and complaints, and direct marketing activities, such as sending promotional or commercial material. The performance of a contract, compliance with legal and regulatory obligations (including, for example, the Article 30bis declaration of works) and/or our legitimate interest serve as the legal basis for this.

### 5.2 Data relating to suppliers and subcontractors

We collect and process the identity and contact details of our suppliers, subcontractors and potential subcontractors, as well as their staff, appointees and other relevant contacts. This processing is carried out for the purposes of performing contracts, managing suppliers/subcontractors, accounting, managing any disputes and complaints, and direct marketing activities, such as sending promotional or commercial material. The legal basis for this is the performance of a contract, compliance with legal and regulatory obligations (including, for example, mandatory electronic attendance registration, the Article 30Bis declaration of works, the attendance list or other requirements of public tenders) and/or our legitimate interest (such as direct marketing). Where relevant, E-ID data or the Limosa number is processed for the purposes of electronic attendance registration. Consent is always sought for direct marketing activities via email (for example, newsletters or invitations to events), and this consent may also be withdrawn at any time.

### **5.3 Staff data**

We process personal data of our employees in the context of personnel management and payroll administration. Given the specific nature of this processing, it is regulated in greater detail in a Data Protection Policy for Employees.

### **5.4 Other data**

In addition to data relating to our customers, suppliers/subcontractors and staff, we also process personal data relating to other parties, such as potential new customers/prospects, useful contacts within our sector, networking contacts and relevant experts. This processing is carried out in connection with our general, direct marketing and public relations activities. Our legitimate interest, or in some cases the performance of a contract, serves as the legal basis for this.

Through our websites, we only collect personally identifiable information about you (such as your name, title, address, telephone number or email address) that you provide to us yourself, for example via a contact form, registration or survey. If you do not wish to provide certain information to us, you are under no obligation to do so.

## **6 DURATION OF PROCESSING**

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We do not retain or process personal data for longer than is necessary for the purpose for which it was collected and for the purposes of our relationship with you (whether contractual or otherwise).

## **7 RIGHTS**

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In accordance with and subject to Belgian data protection legislation and the provisions of the GDPR, we hereby inform you that you have the following rights:

- The right of access and inspection: you have the right to access the data we hold about you free of charge and to verify the purpose for which it is being used.
- The right to rectification: if your personal data is incomplete or inaccurate, you have the right to have it rectified (corrected or supplemented).

- The right to erasure or restriction of processing: you have the right to request that we erase your personal data or that we restrict its processing in the circumstances and under the conditions set out in the GDPR. We may refuse to erase or restrict personal data that may be necessary for us to comply with a legal obligation, to perform a contract or to pursue our legitimate interests, and to do so for as long as this data is necessary for the purpose for which it was collected.
- The right to data portability: you have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format. You have the right to transmit this data to another data controller.
- The right to object to processing: you have the right to object to the processing of your personal data on serious and legitimate grounds. Please note, however, that you cannot object to the processing of personal data that is necessary for us to comply with a legal obligation, to perform a contract or for our legitimate interests, and that this remains the case for as long as such data is necessary for the purpose for which it was collected.
- The right to withdraw consent: where the processing of personal data is based on prior consent, you have the right to withdraw that consent. In that case, personal data will only be processed if we have another legal basis for doing so.
- Automated decision-making and profiling: we confirm that the processing of personal data does not involve profiling and that you will not be subject to a decision based solely on automated processing.

You may exercise the above rights by contacting the Cordeel Group IT department at [gdpr@cordeel.eu](mailto:gdpr@cordeel.eu) or by calling us on +32 (0)3 710 55 72.

We normally respond to your request within four weeks of receipt. In the event of a decision to rectify, supplement, erase and/or protect personal data, we aim to carry this out within 14 working days.

In order to exercise one or more of your rights in writing or by email, and to prevent the unauthorised disclosure of personal data, you must provide proof of your identity. This is best done by sending us a copy of the front of your identity document.

You may also contact us via the above channels if you wish to lodge a complaint regarding the processing of your personal data.

We make every effort to handle your personal data carefully and lawfully, in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been infringed and your concerns have not been addressed by our company, you have the right to lodge a complaint with:

Data Protection Authority  
Drukpersstraat 35, 1000 Brussels  
Tel. +32 (0)2 274 48 00  
Fax: +32 (0)2 274 48 35  
Email: [contact@apd-gba.be](mailto:contact@apd-gba.be)

Or via the online form: [Submit a complaint | Data Protection Authority](#)

In addition, you may take legal action if you believe you have suffered loss or damage as a result of the processing of your personal data.

To unsubscribe from the digital newsletters, simply click on the unsubscribe button in the emails themselves. If you wish to unsubscribe from brochures or magazines, you can always contact us via [gdpr@cordeel.eu](mailto:gdpr@cordeel.eu).

## **8 TRANSFER TO THIRD PARTIES**

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Certain personal data that we collect is passed on to and may be processed by external service providers, such as our IT supplier, accountant, auditor, professional advisers, insurer and by the government (for example, in the case of the 30bis declaration of works, electronic attendance registration or public procurement contracts).

One or more of the aforementioned third parties may be located outside the European Economic Area (EEA). However, personal data will only be transferred to countries with an adequate level of protection.

The employees, managers and/or representatives of the aforementioned service providers or institutions, as well as any specialist service providers appointed by them, must respect the confidential nature of your personal data and may only use this data for the purpose for which it was provided.

Your personal data may be transferred to other third parties where necessary. This may be the case, for example, if we undergo a full or partial reorganisation, if our business is transferred, or if we are declared bankrupt. It may also be necessary to disclose personal data as a result of a court order or to comply with a specific legal obligation. In such cases, we will make reasonable efforts to inform you before this data is disclosed to other third parties. However, we ask you to recognise and appreciate that, in certain circumstances, this may not always be technically or commercially feasible, or that legal restrictions may apply.

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 ORGANISATIONAL MEASURES**

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When processing your personal data, we take the necessary technical and organisational measures to ensure confidentiality and security and to protect this data against destruction, loss, falsification, alteration, unauthorised access or accidental disclosure to third parties, and against any other unauthorised processing.

These measures include:

- training for relevant staff to ensure they are aware of our data protection obligations when handling personal data;

- administrative and technical controls to restrict access to personal data on a 'need-to-know' basis;
- technical security measures, including firewalls, anti-virus software and encryption;
- physical security measures, such as security badges for access to our premises, locked business premises, etc.

Although we take appropriate security measures as soon as we receive your personal data, data transmission in particular is never entirely secure. We do our utmost to protect your personal data, but we can never fully guarantee the security of personal data sent to us or by us.

Under no circumstances shall Cordeel Group and its affiliated companies and/or the data processor be held liable for any direct or indirect damage or loss resulting from the incorrect or unlawful use of personal data by a third party.

## **10 ACCESS BY THIRD PARTIES**

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In order to process your personal data, our employees, colleagues and agents have access to this data. We ensure a comparable level of protection by imposing contractual obligations on these employees, colleagues and agents that are comparable to this Data Protection Statement.

## **11 OTHER QUESTIONS**

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If, after reading this data protection notice, you still have any questions or comments regarding the collection and processing of your personal data, please contact Cordeel's IT department by post at Cordeel Zetel Temse NV, IT Department, Frank van Dyckelaan 15, 9140 Temse, or by sending an email to [gdpr@cordeel.eu](mailto:gdpr@cordeel.eu) or .

## 12 Appendix 1 – Cordeel Group Companies

This privacy policy applies to all entities operating under the ‘Cordeel Group’ brand name and listed below.

| Company                                              | Registered office address                  | CBE number   |
|------------------------------------------------------|--------------------------------------------|--------------|
| +Earth+ BV                                           | Frank Van Dyckelaan 15, 9140 Temse         | 1015.202.196 |
| Albatros Development NV                              | 15 Frank Van Dyckelaan, 9140 Temse         | 0836 362 704 |
| Ambiorix Real Estate Construction and Development NV | Industrielaan 18, 3730 Bilzen - Hoeselt    | 0659 890 010 |
| Ambiorix Real Estate (Landco) NV                     | Industrielaan 18, 3730 Bilzen - Hoeselt    | 0659 889 515 |
| Baeck Cladding NV                                    | Koralenhoeve 9, 2160 Wommelgem             | 0720 874 603 |
| Bernard Construction SA                              | Rue le Marais 14, 4530 Villers-le-Bouillet | 0461 381 686 |
| Bernard Invest SA                                    | Rue le Marais 14, 4530 Villers-le-Bouillet | 0842 005 233 |
| Bruggen in Kapellen NV                               | 15 Frank Van Dyckelaan, 9140 Temse         | 0667 777 593 |
| Buildings Maintenance & Services NV                  | Frank Van Dyckelaan 17, 9140 Temse         | 0707 804 149 |
| C2F1 NV                                              | 15 Frank Van Dyckelaan, 9140 Temse         | 0744 436 002 |
| Cadran Saint-Hubert                                  | 14 Rue le Marais, 4530 Villers-le-Bouillet | 0826 949 249 |
| Cadran Holding BV                                    | 14 Rue le Marais, 4530 Villers-le-Bouillet | 0508 803 305 |
| Cadran Saint-Martin                                  | 14 Rue le Marais, 4530 Villers-le-Bouillet | 0826 945 091 |
| Cadran Saint-Severin                                 | 14 Rue le Marais, 4530 Villers-le-Bouillet | 0826 946 477 |
| C-Battery BV                                         | Frank Van Dyckelaan 17, 9140 Temse         | 0762 436 529 |
| C-Biotech BV                                         | 15 Frank Van Dyckelaan, 9140 Temse         | 0794 909 852 |
| C-Concrete NV                                        | Frank Van Dyckelaan 19 D, 9140 Temse       | 0460 990 520 |
| C-Energy BV                                          | 15 Frank Van Dyckelaan, 9140 Temse         | 0456 904 543 |
| C-Farm BV                                            | 15 Frank Van Dyckelaan, 9140 Temse         | 1011 572 616 |
| C-Fast NV                                            | 15 Frank Van Dyckelaan, 9140 Temse         | 0693 855 945 |
| C-Fire NV                                            | 3 Frank Van Dyckelaan, 9140 Temse          | 0415 201 669 |
| C-Ground NV                                          | 15 Frank Van Dyckelaan, 9140 Temse         | 0477 733 413 |
| C-Guard BV                                           | Koralenhoeve 9, 2160 Wommelgem             | 0502 264 416 |
| C-Living NV                                          | 15 Frank Van Dyckelaan, 9140 Temse         | 0446 150 708 |
| C-Metal NV                                           | 19A Frank Van Dyckelaan, 9140 Temse        | 0735 611 772 |
| CMart_Tech BV                                        | 15 Frank Van Dyckelaan, 9140 Temse         | 1022 779 480 |
| Cordeel Group (Vita Group) NV                        | 15 Frank Van Dyckelaan, 9140 Temse         | 0458 393 294 |
| Cordeel Maintenance NV                               | Industrielaan 18, 3730 Bilzen-Hoeselt      | 0822 224 953 |
| Cordeel Belgium NV                                   | Industrielaan 18, 3730 Bilzen-Hoeselt      | 0427 302 321 |
| Corfius Immo NV                                      | Industrielaan 18, 3730 Bilzen-Hoeselt      | 0661 775 471 |
| Cortem NV                                            | 15 Frank Van Dyckelaan, 9140 Temse         | 0736 839 912 |
| C-Rental NV                                          | 15 Frank Van Dyckelaan, 9140 Temse         | 0508 811 817 |
| C-Scan BV                                            | 15 Frank Van Dyckelaan, 9140 Temse         | 1006.146.059 |

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|------------------------------------------|-----------------------------------------------------------|--------------|
| C-Supply BV                              | Frank Van Dyckelaan 17, 9140 Temse                        | 0860 464 531 |
| C-Tech Holding NV                        | 3 Frank Van Dyckelaan, 9140 Temse                         | 0404 800 202 |
| C-Wood NV                                | Frank Van Dyckelaan 19 - E, 9140 Temse                    | 0735 611 970 |
| Dungelhoeff Private NV                   | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0845 724 588 |
| Ekkelgarden Park NV                      | 15 Frank Van Dyckelaan, 9140 Temse                        | 0862 096 210 |
| Van Hecke Electrical Engineering NV      | Walgracht 22, 9940 Evergem                                | 0465 957 613 |
| Fino NV                                  | Rotstraat 16, 9140 Temse                                  | 0456 886 925 |
| Flywel BV                                | Merodestraat (KIE) 117, 9130 Beveren-Kruibeke-Zwijndrecht | 0757 743 313 |
| Genk Logistics NV                        | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0833 797 647 |
| Gent Bellevue By C NV                    | 15 Frank Van Dyckelaan, 9140 Temse                        | 0808 093 340 |
| Immo Matches NV                          | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0454 707 591 |
| Imso BV                                  | 15 Frank Van Dyckelaan, 9140 Temse                        | 0881 541 443 |
| Imtech Belgium NV                        | Industrielaan 28, 1070 Anderlecht                         | 0402 969 474 |
| JBCOR RE Construction and Development NV | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0675 938 560 |
| JBCOR RE NV                              | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0675.937.174 |
| Karmel Aalst By C BV                     | 15 Frank Van Dyckelaan, 9140 Temse                        | 0534 758 228 |
| Krucor NV                                | 15 Frank Van Dyckelaan, 9140 Temse                        | 0823 805 360 |
| Landexplo Genebos (CLEG) BV              | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0826 105 745 |
| Land Aalst BV                            | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0846 242 549 |
| Landexplo Zele (CLEZ) BV                 | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0826 104 161 |
| Molcor NV                                | Industrielaan 18, 3730 Bilzen-Hoeselt                     | 0723 941 187 |
| Nieuw Feniks NV                          | 15 Frank Van Dyckelaan, 9140 Temse                        | 0795 586 278 |
| Off site Belgium BV                      | Frank Van Dyckelaan 19 E, 9140 Temse                      | 0633 975 271 |
| Panorama View NV                         | 15 Frank Van Dyckelaan, 9140 Temse                        | 0885 737 187 |
| Pelikaan Association Centre BV           | 15 Frank Van Dyckelaan, 9140 Temse                        | 0825 465 842 |
| Sobeltec NV                              | Klein Frankrijkstraat 43, 9600 Ronse                      | 0447 304 315 |
| Technocon BV                             | Groendreef 91, 9880 Aalter                                | 0456 745 977 |
| Tennis Middelkerke BV                    | 15 Frank Van Dyckelaan, 9140 Temse                        | 0469 163 462 |
| Vita Den Uyt NV                          | Rode-Kruislaan 18, 2400 Mol                               | 0676 848 479 |
| Vita Krokodiel / VITA Middelkerke NV     | Westendelaan 96, 8430 Middelkerke                         | 0743 504 406 |
| Vita Scheldebod / VITA TEMSE NV          | Kasteelstraat 85, 9140 Temse                              | 0665 710 010 |