



# Privacy Statement

## 1. Who are we?

PEC is an international company, headquartered in Belgium. For a full list of our relevant legal entities and the corresponding addresses, please [click here](#)<sup>1</sup>. In the context of our activities, we collect, hold, disclose and/or otherwise process personal data. Pursuant to applicable data protection and privacy legislation, the relevant entity of PEC (hereafter: **PEC, we, us**) who you are in contact with qualifies as the controller with respect to the personal data that we process.

## 2. We know your privacy is important to you

We value the right to privacy and strive to protect the personal data we collect and use in accordance with applicable data protection legislation and more specifically with the General Data Protection Regulation (**GDPR**) and its relevant national implementing legislation.

In this Privacy Statement we will elaborate on whose personal data we collect, what personal data we collect, how we collect personal data, for what purposes we use personal data and to whom personal data is disclosed by us. Further, this Privacy Statement includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Privacy Statement very carefully.

However, what is relevant to you will depend on the relation you have with us. In view thereof, this Privacy Statement is structured in a layered way that enables you to read only what is relevant to you.

- If you are a customer of PEC, please refer to [paragraph 3](#) of this Privacy Statement.
- If you visit PEC, please refer to [paragraph 4](#) of this Privacy Statement.
- If you have subscribed to receive certain mailings from PEC, please refer to [paragraph 5](#) of this Privacy Statement.
- If you give us your business card or otherwise provided your contact details to PEC, please refer to [paragraph 6](#) of this Privacy Statement.
- If you email or otherwise contact PEC, please refer to [paragraph 7](#) of this Privacy Statement.
- If you are a visitor of our website, please refer to [paragraph 8](#) of this Privacy Statement.
- If you want to apply or have applied for a job at PEC, please refer to [paragraph 9](#) of this Privacy Statement.

From time to time, we may need to change this Privacy Statement. The most recent version of this Privacy Statement is available on our website. In case of important changes of our Privacy Statement, we will actively inform you on these changes.

## 3. If you are a customer of PEC

*How do we collect your personal data, what personal data do we collect and why?*

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<sup>1</sup> <http://www.peccorp.com/about-us/#locations>



Pursuant to applicable laws, all legal and financial services providers, including PEC, are required to have at their disposal certain information and/or documents regarding the identity of their customers. In view hereof, by means of our Company or Partnership Identification, we collect certain personal data of our customers and in the event that our customer is a legal entity or body, of representatives of our customers.

In this context, we process the following personal data for the following purposes:

Personal data:	Purposes:
name, business address, passport copies, position, qualification, excerpts of registers (public or not)	to identify you, to verify whether you are authorized to represent our customer, to comply with our legal obligations

We process this personal data in order to comply with our legal obligations in order to identify our customers.

For the processing of these personal data, we rely on our legitimate interests to protect our assets and business.

We process this personal data in order to execute the services we render to our customers. This means that if the customer is an individual, we base our processing on the necessity for the execution of the agreement entered into with the data subject and if the customer is a legal entity on our legitimate interests to execute the agreement entered into with the customer(which is not the data subject itself).

*With whom do we share this personal data?*

Where relevant, we will share your personal data with our affiliated companies, and third parties, where this is required for the purposes as set out above or where these third parties assist us in this respect. The recipients of your personal data may be located in countries outside the European Union (EU) which countries may offer a lower level of data protection than the country in which we are established. For example, we may need to engage a debt-collection agency established outside the EU, for instance in case you or your company is based in a non-EU country.

*How long do we store your personal data?*

Generally, we will retain your personal data for the purposes as set forth above for 20 years after termination of our customer relationship or the relevant file/matter.

**4. If you are a visitor of PEC**

*How do we collect your personal data, what personal data do we collect and why?*

If you visit the offices of PEC, kindly note that we make use of CCTV on most of our premises. This means that if you visit PEC, you may appear on our camera footage. If we have a reason to believe that certain irregularities have taken place our security personnel shall gain us access to the camera footage.

We use CCTV to ensure that only authorized persons enter our offices, to protect our business (interests), properties and employees and to be able to investigate and handle irregularities. Where relevant, we will also use the camera footage to establish, exercise or defend our (legal) position in the event of (legal)



proceedings. For the use of CCTV, we rely on our legitimate interests to protect our offices from access by unauthorized persons, in particular in view of the confidential information that is kept in our offices.

*How long do we store your personal data?*

As a general rule, we will keep the camera footage to a maximum of 90 days. However, if the camera footage shows some irregularities, we will keep the camera footage for a longer period to enable us to investigate and handle these irregularities. After these periods, the camera footage is overwritten.

*With whom do we share your personal data?*

As referred to above, our security personnel takes care of our security services. These employees have access to the camera footage. In exceptional cases, for example, in the event of criminal offences evidenced by the camera footage, we will share relevant camera footage with our affiliated entities, intelligence and investigative authorities or bodies. Further, if we are (legally) obliged to, we will provide the camera footage to competent authorities upon their request and we may use the camera footage as evidence in a legal proceeding and, hence, provide the camera footage to competent courts and counterparties.

The recipients may be located in a country outside the EU, for example in the event that we pursue legal proceedings in a country outside the EU or a counterparty is based in a non-EU country. In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your personal data in accordance with applicable data protection legislation.

## **5. If you have subscribed to receive certain mailings from PEC**

As an international company, we guarantee top-level advice and are committed to meeting customer needs at the highest quality level in the most efficient way. We owe our success to our culture, our reputation and the trust placed in us by our customers. This is also shown in our tailored updates, mailings and events.

In order to send you these tailored updates and mailings and to invite you for events regarding matters of your particular interest (the **Newsletters**), we process your personal data in our customer relation management (CRM) systems. In the context of our Newsletters, we collect your personal data because you are our customer or other valued contact.

*How do we collect your personal data and why?*

We may collect information about you:

- directly from you, such as the information you provided to us when you opted-in for our Newsletters;
- from other sources, such as your (former) employer or colleagues;
- from publicly available sources such as LinkedIn or the corporate website of the organization you are working for; and
- by means of cookies (that are placed when you opt-in for our Newsletters and in any of our Newsletters). For more information on the cookies we use in this respect, please see below.

We have two legal basis for processing your personal data with respect to our Newsletters: your consent or our legitimate interest if you are our client. Our legitimate interest translates into our objective to communicate relevant industry developments and to invite our valued customers and contacts (and their partners) to events. We also aim to only send relevant Newsletters, to personalize our Newsletters, and to keep our database up to date. Furthermore, we use the information provided by you to better understand the recipients of our Newsletters and to improve our Newsletters and service offering.

Below we have schematically set out what personal data we collect about you and for what purposes.

<b>Personal data:</b>	<b>Purposes:</b>
name (initials)*	to correctly address our Newsletters
address (business and private)	to contact you
position or profession	to correctly address you and to customize our Newsletters
title(s)	to correctly address you
email address*	to contact you and send you the Newsletters
telephone number, mobile telephone number or facsimile number	to contact you
gender	to correctly address you
company or organization	to reflect your company or organisation on your name badge and to link you to our business relation
link to your LinkedIn page	to keep your personal data up-to-date
your contact person at PEC	to correctly address you and to customize our Newsletters
areas of interest	to customize our Newsletters and include you on the correct marketing lists
marketing lists in which you are included based on your areas of interest	to customize our Newsletters
(previous) mailings you have been sent by us	to monitor the correctness of sent Newsletters and the use of the correct contact details and to analyse our Newsletters
contact details of your secretary	to contact you
we may also register when we are informed that you are deceased	to keep the data we collect up-to-date and to ensure that you no longer receive undesired Newsletters
opt-in/opt-out for marketing materials	to correctly register and follow-up any opt-in or opt-out that you have indicated to us, in order to ensure our Newsletters are customised to your



	expressed wishes and to ensure that you no longer receive undesired Newsletters
opt-in/opt-out for other Newsletters	to correctly register and follow-up any opt-in or opt-out that you have indicated to us, in order to ensure our Newsletters are customised to your expressed wishes and to ensure that you no longer receive undesired Newsletters
whether you have opened the Mailing and or clicked on any links included in the Mailing	to analyse whether our Newsletters are well-read and to improve our (future) Newsletters

We are required to process the personal data marked with an asterisk (\*) in order to be able to send you the Newsletters. Of course, you may refuse to give us certain of these personal data. Please keep in mind that this may result in us being unable to send you the Newsletters or to correctly address you in these Newsletters.

*With whom do we share your personal data?*

In the context of the purposes as listed above, we may share your personal data with third parties, such as parties that help us organize or host our events and researchers that help us analyse our Newsletters.

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

We will share your personal data with our affiliated entities. These may be located in countries outside the EU, which countries may offer a lower level of data protection than the country in which we are established. As a general rule, we do not share your personal data as set out above with other parties located in countries outside the EU. This may, however, be different in the event that we organize an event in a country outside the EU and, hence, the host of our event is located in such country. In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your personal data in accordance with applicable data protection legislation. *How long do we store your personal data?*

We will store your personal data as listed above until the moment you have informed us that you no longer wish to receive our Newsletters, we cease the sending of the relevant Newsletters, or it appears that your email address is no longer in use (for example when we receive a filed delivery notification).

*Use of cookies in Newsletters*

Our Newsletters make use of tracking cookies by Google Analytics, Click Dimensions and Wordpress to track visitor statistics. We use these statistics to continuously improve our Newsletters, and thus offer you relevant content.

If you opt in to our Newsletters, downloading images or clicking on a link in any of these Newsletters will cause you to be personally identified. This means we can see whether you open our Mailing. If you wish to avoid this tracking, you can unsubscribe from our Newsletters or customise the settings of your browser so that it refuses cookies.



Most web browsers automatically accept cookies, but you can usually customize the settings of your browser so that it refuses cookies. You must set your settings for each browser and on each computer you use.

## **6. If you give us your business card or otherwise provide your contact details to us**

*How do we collect your personal data, what personal data do we collect and why?*

If you have provided your business card to (an employee or partner of) PEC or otherwise provided us with your contact details, we will process your personal data, such as your name, contact details, company, position and your contact person at PEC. We will use your personal data in order to contact you and for example, to ask you whether you would like to subscribe to our Newsletters or if you have given us your contact details for a certain purpose, such as to send you information on our firm or a specific matter, to send you this information.

We have two legal basis for processing your personal data your consent (by actively providing your contact details to us for a certain purpose) or our legitimate interest. Our legitimate interest translates into our objective to communicate relevant legal and tax developments and to invite our valued contacts to events.

*With whom do we share your personal data?*

We will share your personal data with our affiliated entities. These may be located in countries outside the EU, which countries may offer a lower level of data protection than the country in which we are established. As a general rule, we do not share your personal data as set out above with other parties located in countries outside the EU. This may, however, be different in the event that we organize an event in a country outside the EU and, hence, the host of our event is located in such country. In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your personal data in accordance with applicable data protection legislation.

## **7. If you email or otherwise contact PEC**

If you email or otherwise contact PEC (for instance by regular mail), we will process certain personal data relating to you. This will include your name, email address and the content of your email, postal mail or other communication.

We will use this information in order to handle your email postal mail or other communication and revert to your email, postal mail or other communication. Further, where relevant, your email, postal mail or other communication will be used to establish and exercise our business relation. This information will be included into our files and may be used during our business relationship.

All emails sent to and by our employees, are saved in our back-up files for 20 years for administration purposes and to establish and exercise and defend our legal position in the event of claims or disputes.

Further, all emails in the email accounts and files of our employees may be subject to monitoring or investigation by us. Such monitoring or investigation will be carried out by us in accordance with applicable laws and regulations and will be carried out regularly on a random basis and on a more targeted basis in the event that we have any suspicion of (criminal) offences or other irregularities. In the context of such monitoring or investigation, your personal data may be processed, including your name, email address and the context of emails that you have sent to or is forwarded to an employee of PEC.

Where relevant, we may use these emails in legal proceedings and in view thereof be shared with counterparties and courts, and may also be shared with investigative services in the event that criminal offences have been identified. Note that these parties may be established in countries outside the EU. These



international transfers will in most cases be necessary for the establishment and exercise of our joint-business and in other cases, we will take the appropriate safeguards with the recipients.

The outcomes of such monitoring will be deleted as soon as no irregularities have been identified and in the event that irregularities have been identified, as long as necessary to deal with these irregularities.

### 8. If you are a visitor of our website

If you visit our website, certain personal data relating to you will be collected and further processed. To learn more about what personal data is collected and for what purposes, please refer to our Term of use on our website.

### 9. If you want to apply or have applied for a job at PEC

In the context of your application at PEC, we will process certain personal data relating to you.

#### *How do we collect your personal data and why?*

You will provide us most of these personal data yourself, for example your personal contact details and your curriculum vitae. We may also obtain personal data relating to you from other parties, such as employment agencies, head-hunters or selection firms. Further, we will obtain personal data relating to you from other sources, such as social media platforms such as LinkedIn. What personal data we collect about you from others and for what purposes we will use this information is set out schematically below:

<b>Personal data:</b>	<b>Purposes:</b>
name (initials)*, address (business and private), email address*, telephone number, mobile telephone	to identify and correctly address you, to deal with possible complaints and to establish, defend and exercise the (legal) position of PEC and in order to comply with the arrangements we have with employment agencies, head-hunters and selection firms
language, nationality, civil status, family status, gender	to correctly address you
photograph	to identify you
education, competences, professional experience, copy of your Diploma	to determine whether you are suitable for and meet all relevant requirements for fulfilling the position you applied for and fit in the company culture of PEC, to deal with possible complaints and to establish, defend and exercise the (legal) position of PEC and in order to comply with the arrangements we have with employment agencies, head-hunters and selection firms



current salary	to have an indication in the salary that we may offer you, to deal with possible complaints and to establish, defend and exercise the (legal) position of PEC and in order to comply with the arrangements we have with employment agencies, head-hunters and selection firms
Security certificates, outcomes of personality, IQ and other tests that you may have to take as part of our application and selection procedure	to determine whether you are suitable for and meet all relevant requirements for fulfilling the position you applied for and fit in the company culture of PEC, to deal with possible complaints and to establish, defend and exercise the (legal) position of PEC and in order to comply with the arrangements we have with employment agencies, head-hunters and selection firms

We process these personal data in order to take steps at the request of a data subject prior to entering into a contract. Further, considering the nature of our services, we have legitimate interests to process these personal data in order to ensure that we hire competent and honorable personnel and to deal with possible complaints or claims relating to our application and selection procedure.

*With whom do we share your personal data?*

We use third party service providers for certain parts of our application and selection procedure (such as personality and IQ tests). Where relevant, we will share your personal data with these service providers. Where relevant (for example, if you apply for an internship in one of our offices abroad), we will share your personal data with our affiliated entities. These may be located in countries outside the EU, which countries may offer a lower level of data protection than the country in which we are established.

*How long do we store your personal data?*

Your personal data will be kept during our application and selection procedure and will be kept for 10 years after completion thereof.

**10. Data protection & security**

As an international company, PEC guarantees top-level advice in every part of the world. We are committed to meeting customer needs at the highest quality level in the most efficient way. We have our own network of offices in major financial centers and we operate in a dynamic business environment where we highly depend on information systems and computer networks. It is essential that the confidentiality, integrity and availability of our customer information is preserved at all times by managing the risks to which they are exposed in accordance with applicable legal/regulatory requirements and internal standards.

**11. Your rights and how to invoke them**

You may ask us for information about and access to your personal data and to object to the processing of your personal data by us. Further, under certain circumstances you have the right to ask us to rectify or delete your personal data, to restrict the processing of your personal data by us and to receive your personal



data in a structured, commonly used and machine readable format and to (have) transmit(ted) your personal data to another organization.

If you have any questions, comments or complaints in relation to this Privacy Statement or the processing of your personal data by us, please feel free to contact your regular contact [dataprotection@peccorp.com](mailto:dataprotection@peccorp.com)

Finally, you have the right to lodge a complaint with the relevant Data Protection Authority, such as the Belgian Privacy Commission. You can find the contact detail on:

<https://www.privacycommission.be>

<https://www.gegevensbeschermingsautoriteit.be/>