

PRIVACY POLICY

This is the PRIVACY POLICY of FORI BV, Steenweg Deinze 150, 9810 Nazareth.

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INTRODUCTION

Below you will find the privacy policy of the FORI BV (hereinafter "FORI" or "we"). This policy concerns the processing of data relating to natural persons, i.e. personal data, on all websites, via all (mobile) apps and via all services of FORI BV. This policy does not apply to the processing of data of legal entities.

This privacy policy is without prejudice to and should be read together with other applicable guidelines and conditions of FORI:

- Cookie policy
- Terms of use
- Ad hoc match rules

This policy is divided into three parts:

- Definitions
- General information on the processing of personal data by FORI
- Specific information on the processing of personal data by FORI

1 DEFINITIONS

Within this policy, it is inevitable to use a number of technical terms. That is why in this section we give a short overview of frequently used terms.

Recommended Contents: suggestions for articles, searches and other information that FORI tailored to the interests of a User (based on Clicking Behavior with his consent) or of a Registered User (based on Clicking Behavior with his consent, and Registered Data).

Cookies: Text or other files and similar technologies that store or access information on your computer, tablet, smartphone, or other device used to visit a FORI Domain. You can find more information about this in our Cookie Policy.

Service: access to news, offers, functionalities for a better user experience, (mobile) apps, Recommended Content or products that FORI sells, delivers or makes available on or through a FORI Domain. For an overview of the Services per FORI Domain, see this overview.

User: you who visit a FORI Domain to enjoy a Service as a consumer, without creating an account. This can be done directly via a FORI Domain or after installing one of our apps.

Registered User: you who register your personal information by creating an account on a FORI Domain.

Targeted Advertisements: commercial information directed to a User or Registered User, tailored to his or her Clicking behaviour, provided that he or she has given his or her consent.

Registered Data: personal information that a Registered User provides to FORI himself/herself. This information may vary per FORI Domain, but usually includes: first name, surname, e-mail address, street, house number, zip code, place of residence, gender, date of birth, desired newsletters, telephone and/or mobile number. This is not an exhaustive list of the data.

Clicking behaviour: the interests of a User or Registered User which, subject to his/her consent, are derived from the use of a Service or from visiting or interacting with third party websites. Clicking behaviour mainly contains:

- Session data, i.e. operating system, device type, browser type, etc. This is necessary in order to provide you with a good user experience.
- Visited pages where we classify you into areas of interest. We do this by adding keywords to certain sections or articles so that we can show you Recommended Content and Targeted Advertisements (e.g. sports, lifestyle, car lover).

FORI Domain: a website or (mobile) application offered or operated by FORI.

2 GENERAL INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA BY FORI

2.1 What are the purposes and legal grounds for processing your personal data?

FORI processes personal data for specific purposes. FORI always does this on the basis of a processing ground as required by law. This is a legal basis that allows the use of personal data. Examples of processing grounds are: consent, execution of an agreement, legal obligation and legitimate interest.

The purposes and legal grounds for processing your personal data differ depending on the Service. More information about the applicable purposes and legal grounds can be found in Part 3 - Specific information about the processing of personal data by FORI.

2.2 How does FORI receive your personal data?

FORI processes your personal data in the first place because you provide them yourself as part of the provision of a Service.

Furthermore, FORI also receives personal data from other sources:

FORI that has personal data about you can also receive personal data about you from another source such as the partner Marke of the company Mentoring Systems BVBA and Public sources, such as official government publications (e.g. Moniteur belge, KBO), Advertisers, Social Media (see Section 2.8 for more information), other Partners with whom

FORI collaborates to classify you into Targeted Advertising target audiences based on your Registered Data and your Clicking Behavior on a FORI Domain and on these Partners' websites. We will only do this based on your consent.

2.3 How can you contact the Data Protection Officer (DPO)?

A data protection officer (DPO) has been appointed for all processing operations by FORI. You can always contact them with questions or complaints in connection with any processing of personal data by FORI. To contact the DPO, send an e-mail to DPO@fori.be.

2.4 Who receives your personal data?

FORI can pass on your personal data to:

- Subcontractors working on its behalf and for its account (processors),
- its employees in the performance of their duties,
- Advertising partners and advertisers for displaying Targeted Advertisements, if you have consented,
- Social media through which you log on to or interact with our Services,
- FORI's commercial partners, if you have agreed,
- Third parties in the context of discussions, investigations, evaluations, negotiations and implementing measures relating to a cooperation or company law transaction (acquisition, merger, sale of shares or assets, joint venture, etc.).
- The professional advisers of the parties involved (lawyers, consultants, etc.),
- Judicial, police or administrative authorities if required by law or circumstances

Partners with whom FORI works to classify you into Targeted Advertising target audiences based on your Registered Data and your Clicking Behavior on a FORI Domain and on these partners' websites. We only do this based on your consent.

FORI ensures that these recipients only have access to personal data that is relevant, adequate and necessary for the processing.

For some processing operations, there are specific recipients of your personal data, which are always listed below in Part 3 - Specific information on the processing of personal data by FORI.

2.5 Does FORI share your personal data with countries outside the European Economic Area?

The European Economic Area (EEA) includes the countries of the European Union and Norway, Liechtenstein and Iceland. European law requires additional safeguards when FORI transfers personal data to other countries located outside the EEA. To ensure that these countries have the same level of protection for handling your personal data, the European legislator imposes appropriate safeguards on data controllers.

For certain processing operations, FORI will transfer your personal data to recipients outside the European Economic Area. In such a case, FORI will ensure that the transfer is covered by appropriate safeguards, including an adequacy decision of the European Commission, the European Commission's Model Provisions or EU-US Privacy Shield.

You can always consult the Data Protection Officer (DPO) to obtain access to the appropriate safeguards provided by FORI.

2.6 What rights do you have as a data subject?

Subject to the conditions, limitations and modalities provided by applicable law, you can contact FORI to exercise the following rights:

You have a right to access your personal data. This allows you to check which personal data FORI processes.

You have the right to correct your personal data. This allows you to correct or supplement incorrect or incomplete personal data that FORI processes.

You have the right to delete your personal data. This allows you to permanently delete personal data that FORI processes. FORI is not always obliged to delete your personal data at your request - this right only applies in the cases and to the extent provided for by law.

You have a right to restrict the processing of personal data relating to you. This allows you to freeze the use of your personal data by FORI without deleting them. FORI is not always obliged to limit your personal data at your request - this right only applies in the cases and to the extent provided by law.

You have a right of objection. This allows you to object to the further processing of your personal data by FORI. FORI is not always obliged to comply with your objection.

You have the right to withdraw your consent at any time when the processing of your personal data is based on your consent.

You always have the right to object to the processing of your personal data for direct marketing purposes.

You have a right to data transfer. This allows you to easily move, copy or forward personal details from one person responsible for processing to another. This right can only be exercised if the processing is based on your consent or on an agreement with you.

For all processing operations included in this privacy policy, you can exercise all your rights by contacting the DPO. To contact the DPO, please send an e-mail to DPO@fori.be.

2.7 Would you like to file a complaint with the supervisory authorities?

You have the right to complain to the supervisory authority:

For the Services offered by FORI, that is: Data Protection Authority, Drukpersstraat 35, 1000 Brussels, Belgium, contact@apd-gba.be, <https://www.gegevensbeschermingsautoriteit.be/>, tel: +32 2 427 48 00.

2.8 Interaction via social media

If you use or access a Service through your account on social media (e.g., logging into your facebook account) or interact with our social media channels or through buttons or other techniques, FORI may retrieve data that is publicly shared through the social networking site such as public profile information, list of friends, your use of social networking sites, and your email address.

Use of or interaction with social media is subject to the social media channel's own rules - FORI has no influence on this. Please consult the terms of use and privacy policy of the relevant social media network to understand how the network handles your personal information.

3 SPECIFIC INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA BY FORI

Below you can find out which are the different processes within FORI. Each of the processes below takes place at FORI, unless otherwise indicated.

For more general information about this processing (who is the data controller, what are the contact details of the data protection officer and the supervisory authority, who are the recipients of your personal data, what are your rights, does FORI share your personal data with countries outside the EEA, etc.), see Part 2 - General information about the processing of personal data by FORI.

3.1 You contact us for a question, request for information or complaint

When you contact FORI for a question, request for information or complaint, FORI will process your personal data on the basis of its legitimate interest in answering or assisting you.

FORI will keep your personal data for a maximum of 10 years after your question, request for information or complaint has been completed.

3.2 You participate in market research or surveys

When you participate in a survey or market research, the FORI Entity concerned processes your personal data based on your consent. You have the right to withdraw your consent at any time.

FORI that conducts market research or surveys keeps your personal data for a maximum of 3 years after the end of the research / survey.

3.3 You are a contact person of a business customer for one of the Services (B2B)

When FORI provides a Service to a business client (B2B), it processes your personal data within the framework of its client management on the basis of the need to take pre-contractual measures (inclusion of order, follow-up prospects, etc.), to execute the agreement (account creation and management, delivery, invoicing, collection, etc.) and on the basis of its legitimate interest (invitation to participate in surveys or market research, direct marketing, etc.).

FORI, which processes your personal data within the framework of its customer management, retains your personal data for a maximum of 10 years after the end of the customer relationship.

3.4 You are a customer-consumer for one of the Services (B2C)

When FORI provides you with a Service, it processes your personal data:

Within the framework of its customer management based on the need to take pre-contractual measures (withdrawal order, follow-up of abandoned shopping cart, etc.) and/or the need to execute the agreement (creation and management account, provision of a Service, invoicing, collection, etc.).

For sending invitations to take part in surveys or market surveys as well as for direct marketing based on its legitimate interest.

If you use a Service, the FORI Entity concerned will also collect and use your Click Behavior under the following conditions and modalities for:

Analysis and improvement of the Service you purchase based on FORI's legitimate interest. This allows us to improve the digital news experience on FORI domains for all users.

Recommended Content: If you consent through your privacy preferences in your account, we may recommend articles or other content that are more relevant to your interests and that you have not yet read. For this purpose, the FORI entity concerned creates a profile so that it knows your preferences.

Targeted Advertisements: with your consent, online advertisers can display advertisements tailored to your interests using cookies and similar technologies. More information can be found in the Cookies policy.

FORI, which processes your personal data in the context of pre-contractual measures and/or customer management, retains your personal data for up to 10 years after the end of the customer relationship. For the use of Click Behaviour, a maximum period of 3 years after receipt applies.

You can enjoy our Services as soon as you visit a FORI Domain or after installing one of our apps (User). If you choose to create an account with a FORI Domain, you become a Registered User and our Services are more extensive than those for Users.

3.5 You participate in a contest or promotional activity

When you enter a Contest or Promotional Offer from FORI, this entity will process your personal data for the purposes of administering the Contest/Advertise and identifying the winner based on the agreement with you. The processing of your personal data is necessary to manage the contest or action and to contact the winners to hand over the prize.

Participation in a contest or promotion may also be subject to contest rules or promotion terms and conditions.

FORI that processes your personal data for the purposes of administering the contest or promotion and identifying the winner will retain your personal data for up to 10 years after the end of the contest or promotion.

3.6 You receive commercial information about FORI's Services

When you receive commercial information about FORI's Services, that entity processes your personal data for direct marketing purposes based on:

your consent, if the commercial information is based on Click Behaviour or its legitimate interest (if you have a relationship with that FORI Entity, e.g., you are a customer or partner, you participate in a contest or promotional action, or you purchase a Service).

You have the right to withdraw your consent at any time.

You have the right to object at any time to the further receipt of commercial information about FORI's Services. You can exercise this right by changing the settings of your account or contacting FORI from whom you receive this information, see overview of all FORI Entities [here](#).

FORI, which processes your personal data for direct marketing purposes, retains this data for up to 10 years after the end of the relationship with FORI.

3.7 You receive information about products or services from FORI's partners

When you receive commercial information about products or services from a FORI partner, that entity processes your personal data for direct marketing purposes based on your consent. You have the right to withdraw your consent at any time.

You have the right to object at any time to the further receipt of information about products and services from FORI's partners. You can exercise this right by changing the settings of your account or contacting the relevant FORI Entity, see the overview of FORI [here](#).

FORI, which processes your personal data for direct marketing purposes, retains this data for up to 3 years after the last receipt of commercial information from FORI's partners.

3.8 You visit FORI

If you are a visitor to FORI, FORI processes your personal data in the context of visitor management based on its legitimate interests (e.g. guided tour of schools, meeting with FORI contact person, inspection of archives, etc.).

FORI keeps your personal data up to 1 year after your last visit.

3.9 You are a supplier of FORI

If you provide products or services to FORI, that FORI Entity processes your personal data as part of its supplier management based on the need to perform the agreement with you.

FORI keeps your personal data for a maximum of 10 years after the last delivery.

3.10 You apply to FORI

If you apply for a job at FORI, FORI will process your personal data for you:

The management and evaluation of the job applications in the context of the pre-contractual relationship,

Maintaining the recruitment reserve on the basis of its legitimate interest.

FORI keeps your personal data for a maximum of 5 years after the application procedure has ended.

3.11 In any case

If FORI processes your personal data for any of the purposes listed above, FORI will also process your personal data for you:

- Detecting, preventing and combating fraud and abuse on the basis of its legitimate interest. Less fraud and abuse benefits FORI, its customers and its suppliers. This includes in certain cases the use of Google's reCAPTCHA service to prevent misuse by automated data entry. Google keeps track of the personal data necessary for this service, such as your IP address.
- Dispute management based on its legitimate interest, because FORI must be able to safeguard and defend its rights,
- Discussions, investigations, evaluations, negotiations and executive measures relating to a cooperation or corporate transaction (acquisition, merger, sale of shares or assets, joint venture, etc.) by FORI.
- FORI retains your personal information for up to 10 years after your personal information is inactive.