

PRIVACY POLICY SINECURA BVBA



I. Explanation

Your privacy is important to Sinecura BVBA, and your trust is paramount to us.

In this Privacy Policy, we will disclose which information policies we have in place as part of the operation of our organisation in which various Personal Data are collected, maintained and used.

This Privacy Policy is specifically based on Article 13 of the General Data Protection Regulation and contains the rights and obligations of the organisation with regard to the external persons whose Personal Data it processes and this mainly in the context where an order is placed via a therapist for goods and products which are delivered by Sinecura (directly to the client).

II. Model

This “Privacy Policy” regulates the processing of your Personal Data by the Data Controller responsible for the processing: SINECURA BVBA, Zwaantjesstraat 38, 9090 Melle, Belgium.

Carefully read this Privacy Policy, since it contains essential information about how your Personal Data are processed and what your rights are in this respect. By placing an order with Sinecura / relating to products of Sinecura, directly or indirectly through a therapist, you declare to have taken note of this Privacy Policy and you also explicitly agree to it, as well as to the processing of your Personal Data.

Article 1 – General

- 1.1. Sinecura BVBA adheres to the “Act of 8 December 1992 on the protection of privacy with regard to the processing of Personal Data”, as amended by the Act of 11 December 1998 as well as the anti-spam provisions from Book XII of the Belgian Code of Economic Law concerning the “law of the electronic economy”.
- 1.2. With the current Privacy Policy, Sinecura BVBA also complies with the European Regulation 2016/679 of 27 April 2016 on the protection of Personal Data.

Article 2 – Personal Data

Personal Data must be interpreted very broadly and include all information that allows the identification of a natural person. This specifically includes your name, address details, telephone number and email address, which are collected when placing an order via a therapist who confirms this order to Sinecura. You provide some of these data directly to the organisation. We receive other data from third parties, such as the therapist.

The information on legal persons, however, is not covered by the term ‘Personal Data’.

Article 3 – The Collection of Personal Data

Your Personal Data are collected if and when a therapist places an order for goods and/or products supplied by Sinecura.

In principle, the collection and processing of your Personal Data requires your consent, which can be revoked at any time. However, the requirement of consent lapses when the processing of the Personal Data is necessary:

- For the performance of an agreement which involves the data subject;
- To meet a legal obligation;
- To protect the vital interests of another natural person;
- For the performance of a task of general interest;
- For the protection of the legitimate interests of the organisation or a third party.

In concrete terms, Sinecura will not need permission to process your Personal Data when this takes place within the framework of an agreement for the delivery of goods, since this is necessary for the performance of the agreement.

In addition, the organisation will collect and store Personal Data for the purpose of improving its services, which is a legitimate interest and does not require consent.

Article 4 – Whose Personal Data do we Store?

Personal Data are collected in the context of an order placed by the client with his or her therapist regarding the delivery of goods and/or products by Sinecura. In other words, we store the Personal Data of everyone who orders products from/at Sinecura via a therapist, as well as of the therapists themselves.

Article 5 – Which Personal Data

5.1 Data about who you are

This includes:

- Your name, address, telephone number and email address and that of your company or foundation, names of contact persons and representatives of your company, etc.;
- The data on your identity document.

5.2 Data necessary for the performance of the agreement

This mainly concerns data necessary to deliver and invoice the products you have ordered correctly, such as address details, invoicing details, account number, etc.

Article 6 – Purposes of the Processing

If you use the services of Sinecura, some basic information is always required. Without certain information, we cannot assist you as a client.

The following paragraphs describe in more detail how the organisation may process Personal Data.

Processing is a legal term. It is a very broad term, covering everything that can be done with Personal Data: from collection to destruction. The European General Data Protection Regulation defines “processing” as follows: “the collection, recording, organisation, structuring, storage, adaptation or

alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of data”.

Sinecura may not simply process your Personal Data; there must be a legitimate purpose and a legal basis for the processing of Personal Data. The specific purposes for processing your Personal Data include:

6.1. General purposes/performance of the agreement:

Sinecura will only process the Personal Data obtained for the following purposes:

- The delivery and invoicing of the goods ordered, whereby the confirmed order of the goods serves as a legal basis.
- To send any payment reminders.

You are not initially required to disclose your Personal Data, but you should understand that the provision of certain services becomes impossible if you refuse the processing of such data.

6.2. Transfer to third parties:

In principle, we do not share the collected Personal Data with third parties. We only do this if there is a compelling reason or an obligation to do so.

This would be the case in the event of a full or partial reorganisation or transfer of Sinecura's activities where it reorganises, transfers or ceases its activities or if Sinecura goes bankrupt. This can mean that your data is transferred to new entities or third parties through which all or part of Sinecura's business activities will be carried out.

Sinecura will make reasonable efforts to inform you in advance of the fact that Sinecura discloses your information to the third party, however, you acknowledge that this is not technically or commercially feasible under all circumstances.

Sinecura will not sell, rent, distribute or otherwise make your Personal Data available to third parties for commercial purposes, except as described above or with your prior consent.

6.3. Legal Requirements:

In rare cases, Sinecura may have to disclose your Personal Data pursuant to a court order or in order to comply with other mandatory laws or regulations. Sinecura will make reasonable efforts to inform you in advance, unless this is subject to legal restrictions.

Article 7 – Duration of the Processing

We store and process the Personal Data for the period necessary for the purposes of the processing and in function of the legislation on traceability of the goods provided.

Article 8 – Your Rights

8.1. Right of access, inspection and copy:

You have the right at any time, free of charge, to inspect or obtain a copy of your Personal Data in our possession, as well as insight into the use we make of your Personal Data.

Before the organisation can provide you with any data, we may ask you for confirmation of your identity and possibly other data to help us respond to your request. We will contact you within 30 days of your request.

8.2. Right to rectification, erasure and restriction:

You are free to choose whether or not you share your Personal Data with Sinecura. In addition, you always have the right to request us to rectify, supplement or delete your Personal Data, insofar as this does not violate the law. The extent to which such requests can be met is assessed on a case-by-case basis and communicated within 30 days.

You acknowledge that in the event you refuse to provide your Personal Data or request the erasure thereof, some services and products will not be available.

Before the organisation can correct any inaccuracies, we may ask you for confirmation of your identity and possibly other data to help us respond to your request. We will contact you within 30 days of your request.

8.3. Right to object:

You also have the right to object to the processing of your Personal Data based on compelling and legitimate reasons. The extent to which such requests can be met is assessed on a case-by-case basis and communicated within 30 days.

8.4. Right to data portability:

You have the right to receive your Personal Data processed by us and/or to transfer these data to other data controllers.

Before the organisation can transfer any data, we may ask you for confirmation of your identity and possibly other data to help us respond to your request. We will contact you within 30 days of your request.

8.5. Right to withdraw your consent:

To the extent that the processing is based on your prior consent, you have the right to withdraw this consent.

8.6. Exercising your rights:

You can exercise your rights by contacting us, either by email to sinecura@sinecura.be or by registered letter to Sinecura, Zwaantjesstraat 38, 9090 Melle, Belgium.

8.7. Automated decisions and profiling:

The processing of your Personal Data does not include profiling and you will not be subjected to automated decisions by us.

8.8. Right to file a complaint:

You have the right to file a complaint with the Belgian Privacy Commission: Privacy Commission, Drukpersstraat 35, 1000 Brussels – 0032 (0)2 274 48 00 – commission@privacycommission.be.

This is without prejudice to a remedy before a civil court.

Article 9 – Security and Confidentiality

- 9.1. We have developed security measures that are technically and organisationally adapted to avoid the destruction, loss, falsification, alteration, unauthorised access or erroneous notification to third parties of Personal Data collected, as well as any other unauthorised processing of such data. If, nevertheless, a breach occurs in relation to the Personal Data which is likely to pose a high risk to your rights and freedoms as a data subject, the breach will be reported without delay.
- 9.2. Under no circumstances can Sinecura be held liable for any direct or indirect damage resulting from the incorrect or unlawful use of the Personal Data by a third party that is unrelated to Sinecura.
- 9.3. You must at all times comply with the security regulations, including preventing any unauthorised access to your login details and access code. You are therefore the sole responsible person for the use of the Website from your computer, IP address and your identification details, as well as the confidentiality thereof.
- 9.4. The Data Protection Authority (Privacy Commission) monitors compliance with the legal requirements for the protection of Personal Data, can call companies to account and, if necessary, impose sanctions if the legal rules are not complied with.

Article 10 – Access by Third Parties

We warrant a similar level of protection by imposing contractual obligations on our employees and agents, which are similar to the obligations established in this Privacy Policy.

Article 11 – Notification of Amendments

In the event of substantial changes or updates to this Privacy Policy, we will post a notice at the top of this page for 30 days to notify our users of these changes or updates. If we intend to use Personal Data in a manner that differs from the manner applicable at the time the data were collected, we will inform you thereof, and you will be given the option to indicate whether or not we may process your Personal Data in that new manner.