

PENSIONS Privacy notice for visitors of the PENSIONS website

Pensions IORP, institution for occupational retirement provision under the form of an Organism for the financing of pensions, authorized on 7 February 2017 (FSMA registration number 50622), with registered office at c/o Intertrust, Marnixlaan 23, 5th floor, 1000 Brussels, Belgium, Enterprise number 0673.570.671 (hereafter called "PENSIONS"), processes and uses personal data related to you or your potential beneficiary(ies), in accordance with the applicable national and European legal provisions (REGULATION (EU) 2016/679 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 (General Data Protection Regulation or GDPR)) and in accordance with this policy. PENSIONS is considered a controller under the GDPR, separate from any other controllers such as your employer.

PROCESSING OF PERSONAL DATA

The following information is relevant to you as visitor of the website of PENSIONS.

The purpose of processing information

PENSIONS needs your personal data in order to allow you to read the website or in order to be able to answer your questions.

What information does PENSIONS process and where does it come from?

PENSIONS is processing your IP address. PENSIONS receives this info automatically from you when you are visiting the website. When you raise a question to PENSIONS via the website, PENSIONS is processing those personal data you provide in order to answer your question.

Legal grounds for processing

The legal ground for processing your consent.

Who does PENSIONS disclose the information to?

For the above-mentioned purposes, personal data may be communicated to subcontractors, social security administration, tax administration, payroll, insurance companies with which PENSIONS has concluded an insurance (and / or reinsurance) contract, the insurance broker or specialized service providers appointed by PENSIONS. PENSIONS' employees or subcontractors are all under the duty of confidentiality regarding your personal data, and they are not entitled, unless so authorized, to disclose or pass on any information that may come to their knowledge in connection with their work. PENSIONS only discloses information to the extent PENSIONS is legally entitled or required, or if PENSIONS obtains your consent to do so.

How long are your personal data retained?

Your personal data will not be kept longer than necessary (except in case of complaints or (legal) proceedings in which case Pensions IORP will maintain the personal data longer).

What are your rights?

As a person whose personal data are being processed, you have different rights.

We will answer your requests aiming at executing these rights within 1 month after you have entered your request. This delay can be extended by two further months where necessary, taking into account the complexity and number of the requests, in which case we will inform you.

The request is free of charge, except in the case of requests deemed by PENSIONS to be manifestly unfounded or excessive (in particular due to their repetitive nature).

PENSIONS may also require the payment of reasonable costs based on the administrative expenses associated with any additional copies requested.

You have the right to access and inspect your personal data processed by us. We will provide you with a copy of your personal data in this connection free of charge if you request so.

You have the right at any time to have incorrect, incomplete, inappropriate or outdated personal data erased or rectified. If you dispute the accuracy of your personal data, you may request a limitation of its processing for a period that enables us to verify the accuracy of your personal data.

If your personal data is processed on the basis of our legitimate interest, you have the right to object to the processing of your personal data for reasons relating to your specific situation. We shall then no longer process the personal data unless (i) for the establishment, exercise or defense of legal claims, or (i) if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You may request that we limit the processing of your personal data when:

- you dispute the accuracy of the data.
- the processing is unlawful and you request the personal data is restricted rather than deleted.
- we no longer need to process the personal data but you require the data to establish, exercise, or defend a legal claim.
- you object to a processing operation

If personal data are no longer needed for the purposes for which they are collected and processed, or if you have objected legitimate reasons to the processing, you can ask PENSIONS to erase the collected data. Under certain circumstances, however, PENSIONS may refuse to erase them.

With respect to the processing of your personal data based on your consent, or because it is necessary for the performance of your contract with us, you may ask us to forward your personal data to you - in a structured, commonly used and digital form - so that you can keep your data for personal (re)use, or to forward this data directly to another data controller, to the extent that this is technically feasible for us.

If you have complaints relating to the processing of your personal data, you should raise these in the first instance with PENSIONS via the e-mail address dpo@bdo.be.

You also have also the possibility to lodge a complaint with the competent data protection authority:

Danish DPA:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
+45 33193200
dt@datatilsynet

Belgian DPA:

Gegevensbeschermingsautoriteit
Drukpersstraat 35, 1000 Brussel
+32(0)22744800
+32(0)22744835
contact@apd-gba.be

Security / confidentiality

PENSIONS undertakes to take appropriate technical and organisational measures to protect your personal data against unauthorised access, illegitimate processing, accidental loss or damage and unauthorised destruction hereof, taking into account the risks related to the processing.

1 Equipment and information security

To avoid unauthorised access to your personal data by third parties, all electronic personal data held by PENSIONS are maintained on systems that are protected by up-to-date secure network architecture that contains firewalls and intrusion detection devices. The data saved in servers is “backed up” to avoid the consequences of any accidental erasure, destruction or loss. The servers are stored in facilities with high security, protected against access for unauthorised personnel, with fire detection and response systems.

2 Access security

PENSIONS considers the security of your personal data which are collected, stored and processed of great importance. PENSIONS undertakes to ensure the integrity of your personal data and to prevent unauthorised access hereto.

Appropriate measures are taken to prevent corruption of data, to block unknown and unauthorised access to the IT system, and to provide appropriate protection of your personal data in the possession of PENSIONS. Access to the automated databases is controlled by log-in information and requires identification via a password before access is granted. Only PENSIONS’ authorised users have access to the data .

3 Training

PENSIONS shall organise adequate training of the PENSIONS' authorised users on, amongst others, the legitimate purposes for processing your personal data; the need to keep your personal data accurate and up-to-date; the legitimate purposes of collecting ; and the need to maintain the confidentiality of your personal data to which PENSIONS' authorised users have access.

PENSIONS' authorised users commit themselves to respect the confidentiality of your personal data and to comply with the Privacy and Data Protection Policy. PENSIONS shall take appropriate measures in accordance with the legislation and regulations concerning data protection if your personal data would be accessed, processed or used in any way which is non-compliant with the requirements of the Privacy and Data Protection Policy.

4 Transfer of data outside the EU

Your personal data are not managed outside the EU. In case we would intend to do so, we will inform you by updating the privacy notice on our website.

Data Protection Officer

PENSIONS has appointed a Data Protection Officer or DPO with the following contact details :

Postal address:

Da Vincilaan 9 E.6
B-1930 Zaventem

Email address:

dpo@bdo.be

The DPO is the contact point for all the questions related to the processing of your personal data and the exercise of your rights.

The DPO shall be subject to an obligation of secrecy and strict confidentiality in performing his tasks and duties.

How You Can Contact PENSIONS about Privacy Questions?

If you have any questions, complaints or need further information about our privacy practices, please contact +45 70200117 or the DPO to the above-mentioned contact details.