

Impact Builders Privacy Policy

In essence – we limit the amount of captured data, and share only the necessary info with our partners.

As long as we are not in business, we limit the captured data to the typical business card info. Since we are organized as a virtual network of advisors, who are operating in a community of tech companies, your information might be shared with some of our partners and some of our tech companies, both during the sales processes, and for the execution of services.

Introduction

This privacy policy applies to the services of Impact Builders, p/a Lagast BV, with registered offices in Belgium, Kastanjelaan 81, BE-9620 Zottegem and registered at the CBE with number BE0445.125.080, represented by Jan Lagast.

Impact Builders considers the privacy of your personal data as a matter of the utmost importance and is committed to processing your information in accordance with the law, the present Privacy Policy and the applicable standards of fair information practices.

Through this Privacy Policy, Impact Builders aims to establish at a strategic level the way in which data is protected, what responsibilities were assigned and what priorities Impact Builders has set for data protection. This Privacy Policy applies specifically to customers, applicants, suppliers, business partners, visitors of our website www.impactbuilders.eu or other persons who contact us (e.g. via contact form, mail, phone or social media).

Accessing or using the website implies your express approval (via handing us your personal information, or via opt-in) of this Privacy Policy. This means that you consent to how Impact Builders collects, uses and processes your personal information.

This Privacy Policy for the protection of your personal data is strictly compliant with the European Union Regulation of 2016/679 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data, the Belgian law of July 30th 2018 and repealing Directive 95/46/EC (“GDPR”). Impact Builders takes responsibility for the processing of your personal data on the Website as a “data controller”.

Please also read our cookie policy which is available on the website www.impactbuilders.eu.

If you have questions about this Privacy Policy, or the manner in which Impact Builders collects, uses or otherwise processes your personal information, please contact us by sending an email to the following e-mail address: privacy@Impactbuilders.eu.

What personal data do we collect?

For the purpose of getting to know each other and evaluating the potential of doing business together, we only collect the typical business card information that is needed for a professional communication, such as:

- Your name, surname, gender, preferred languages, company or organization, role or function, business address, mobile phone number, e-mail addresses.
- If you provided us with a business card, we take a picture of that card and save it with your records. If your business card contains a picture, then that picture will be part of the data that is stored.
- If you send us a message via mail, phone, social media, chat or messaging app, your message and its attachments might also be saved on our computer systems.

As soon as we will be in business, we might collect more information on you and your organization via surveys, intake forms, interviews, meetings, and discussions.

For specific stakeholders, we might capture and save specific additional personal data:

- Potential collaborators: career data such as CV, diplomas, certificates, skills, job and salary expectations, references, survey data, and interview results.
- Collaborators: ID card data, family and marital situation, personal postal address, personal e-mail address, personal phone number, contract data, salary data, performance data, evaluation data, pictures for marketing purposes, quotes and video and audio recordings for testimonials, pictures from social and work events.
- Business partners: cooperation rate, contract info, commission, ordered products, delivered services, invoices and accounting data, payment data, performance data, evaluation data, dispute and mediation interview data, pictures for marketing purposes, quotes and video and audio recordings for testimonials, pictures from social and work events.
- Potential investors: investment capability, investment strategy, marital situation, personal postal address, personal e-mail address, personal phone number.
- Investors: personal postal address, personal e-mail address, personal phone number, marital situation, ID card data, contract data, tax-related data, dividend and payment data.
- Board members: cooperation rate, contract info, potential conflicts of interest, other engagements, invoices and accounting data, payment data, performance data, evaluation data, pictures for marketing purposes, quotes and video and audio recordings for testimonials, pictures from social and work events
- Interviewees: video & audio recordings, edited video and audio documentary movies, pictures, statements, quotes, interview notes, interview consent.

We do not collect sensitive personal data. You are not obliged to provide us with your personal data, however, certain services might not be possible if you do not want to provide any personal data.

What is the legal basis for this data collection?

The information we collect about you is primarily processed to help us ensure proper technical functioning and to improve the quality and content of our website and services – based on the lawful purposes of “consent” for the website, “legal obligations” and “contractual necessity” for services, or “legitimate interest” as allowed under GDPR.

How do we use your personal data?

Impact Builders collects and processes your personal in order to offer you a safe, comfortable, and personalized experience each time you use our services our to inform you correctly when you visit our website.

Your personal data will only be processed for the following (internal) purposes.

1. To provide you with information about the services and other activities of Impact Builders and to better tailor them to your needs and wishes as well as the needs of your company or organization.
For example: when you visit our website
2. To enter into a business or work-related relationship with you or your company and to properly fulfill our contract with you.

For example when you:

- Are a prospect
- Do business with Impact Builders
- Are a customer of one of our business partners
- Use a tool of one of our business partners
- Become an employee consultant of Impact Builders
- Become a business partner of Impact Builders
- Become an investor of Impact Builders
- Become a Board Member of Impact Builders
- When you apply for a job

Or for example to:

- send you invoices
- set up a contract

3. To invite you to our events, to subscribe to our newsletters, to inform you about our products and services, and to send you marketing material. You always have the option to adjust your preferences for receiving newsletters, product and services information, or marketing material. If you do not want to receive newsletters, product and services information, or marketing material you can unsubscribe at any time, without motivation. You can do this by sending us an email (privacy@impactbuilders.eu) or by clicking on the unsubscribe link in the corresponding e-mails.
4. To meet our legal and fiscal obligations.

Your data will not be used for other purposes without informing you in advance and, if necessary, requesting your explicit permission.

Transfer of personal data

In order to process your personal data, we provide access to our employees, consultants, business partners, and board members. We have made contractual arrangements with our employees, consultants, business partners, and board members, in order to ensure they process your personal data in accordance with the law and this privacy policy.

Impact Builders will not disclose your personal data to third parties, unless it is necessary in the context of providing our products or services and/or optimizing them. To that end, Impact Builders may disclose your personal data to third parties who assist Impact Builders in the execution, management and control of its activities, including reporting, support, customer service, computer security, or offering specific services and products.

It may happen that a third party is commissioned to collect, process and/or analyze the data. Furthermore, it may be necessary to provide the personal data to a third party in order for Impact Builders to be able to supply a product or service that you have ordered. These third parties may only use the data for the aforementioned purposes and instructions of Impact Builders. Any other use is not included and is prohibited.

We have made contractual arrangements (data processing agreements) with these companies to ensure they will process your information only on our behalf.

Consequently, Impact Builders will not sell, hire out or pass on your personal data to third parties, except in the situations provided for in this Privacy Policy or unless you explicitly provide prior consent.

In addition, it is also possible that Impact Builders will disclose your personal data:

- If Impact Builders is obligated to do so, following a court order or to comply with imperative laws and/or regulations, or permitted by applicable law in order to safeguard and defend our rights or protect the property or safety of others.
- In case of whole or partial reorganization or cession of Impact Builders's activities, whereby Impact Builders reorganizes, transfers or ceases business activity, your personal data may be transferred to new entities or third parties.

How long will we hold your personal data?

Impact Builders only processes your personal information for as long as necessary. This means that we do keep a record of your data for as long as it is required or justified by the law or by another legal obligation, or for the period for which this would be necessary for the aforementioned purposes.

Referring to the activities described in the chapter entitled "how do we use your personal data?", we hold your data associated with these activities as follows:

1. Three years after the last time you expressed consent.
2. Three years after the last communication you have sent us after the expiration of all legal obligations.
3. Three years after the last time you expressed consent.
4. Three years after the expiration of all legal obligations.

Safety and confidentiality

- Impact Builders undertakes all reasonable efforts as required by applicable law to prevent (i) unauthorized access to your personal information, and (ii) loss, abuse or alteration of your personal data, by using physical, administrative and technological measures to protect the information maintained.
 - All data transmitted from and to our website is encrypted (HTTPS/TLS).
 - Internal data security policies to inform all our internal stakeholders.
 - All data is stored on secure data centres.
- In the unlikely and unfortunate event that your personal information under Impact Builders's control is compromised by an information security breach, Impact Builders will immediately act to identify the cause of such breach and take action through adequate remedial measures. If necessary, Impact Builders will notify you as well as the Data Protection Authority of this incident in accordance with applicable law.
- You shall be solely responsible for your own user content, such as content you upload to the website, and the consequences of posting submitting and/or publishing it. Impact Builders is not responsible or liable to you or any third party for the content or accuracy of any user content posted by you or any other user of the website or web services, and Impact Builders expressly disclaims any and all liability in connection with user content to the fullest extent permitted by applicable law.
- Impact Builders assumes no responsibility regarding the privacy policy of the websites or digital platforms that are linked on the website. Moreover, Impact Builders shall not be liable in any way for direct or indirect damages caused by a wrongful or improper use of your personal data by such third parties.

Your rights as a data subject

- Right of access and right to obtain a copy

You have the right to obtain access to your personal data, as well as to be informed about the purpose of the processing by Impact Builders.

- Right to rectification, erasure, or restriction

You have the choice to share your personal data with Impact Builders. You also have the right to request Impact Builders to rectify your personal data or have it erased. You can also request the processing of your personal data to be restricted.

When you choose not to share data, or when you request that we erase your personal data, we may be prevented from providing you with several services and access to the website.

- Right to object

You have the right to object to the processing of your personal data when you have legitimate reasons to do so. You also have the right to object to the use of your personal data for purposes of direct marketing. In such case specific reasoning will not be requested.

You may opt out of receiving email communications by using one of the following methods:

- Select the email "opt out" or "unsubscribe" link, or follow the opt-out instructions included in each email communication.
- Contact us via the contact form on the website www.impactbuilders.eu. Be sure to provide your name, relevant contact information, and specific relevant information about Impact Builders communications that you no longer wish to receive.

Please be aware that when you opt out of receiving certain subscription communications, it may affect the services you have chosen to receive from Impact Builders where accepting the communications is a condition of receiving the services.

- Right to data portability

You have the right to obtain your personal data which is processed by Impact Builders in a structured, commonly used and machine-readable format and/or to transfer this data to another data controller.

- Right to withdraw consent

When the processing is based on prior consent you have the right to withdraw this consent.

- Automated decisions and profiling

The processing of your personal data does not include profiling, nor shall you be subjected to automated decisions.

- Exercising your rights

To exercise the above-mentioned rights, or to raise a question, comment or complaint, send an e-mail with an enclosed copy of the frontside of your identity card to privacy@impactbuilders.eu.

- Right to file a complaint

If you have any complaints about the way Impact Builders collects, uses and/or processes your personal data, you have the right to file a complaint with the Belgian Data Protection Authority which is the Lead Supervisory Authority of Impact Builders:

Data Protection Authority, Drukpersstraat 35, 1000 Brussels,

Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, E-mail: [contact\(at\)apd-gba.be](mailto:contact(at)apd-gba.be)

However, you are always free to contact your own European or EU-vested authority.

Applicable law and jurisdiction

This Privacy and Cookie Policy is managed, interpreted and executed in accordance with the laws of Belgium which exclusively applies to every potential dispute.

The competent courts of Gent shall have exclusive jurisdiction in relation to any kind of disagreement that could arise from the interpretation or execution of the present Privacy Policy.

Modification

Impact Builders reserves the right to change, modify and update this Privacy Policy from time to time by posting a revised version on our website. Therefore, we recommend you regularly consult the website and verify this Privacy Policy, to make sure that you are aware of any changes.

Version date: 29 March 2020