



UNE EAU POUR LA VIE – WATER VOOR HET LEVEN

## Privacy Policy

VIVAQUA attaches great importance to the protection of the personal data that it processes. This is why VIVAQUA provides you with all necessary information about how it protects your privacy and processes your personal data.

This Privacy Policy provides information about

- the personal data that VIVAQUA<sup>1</sup> collects and the reasons for their collection.
- how your personal data are used
- your rights in relation to your personal data and how to exercise them.

VIVAQUA undertakes to ensure the security of your personal data. Your personal data are never sold to third parties or shared in an insecure manner with services or companies working on behalf of VIVAQUA.

### Who is responsible for processing your personal data?

VIVAQUA is the data controller of your personal data and is responsible for determining the purposes and technical and legal means for such processing. VIVAQUA undertakes to take all organisational measures necessary to ensure that your personal data is securely processed in compliance with the European Regulation 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 (hereinafter referred to as the GDPR).

### What is personal data?

Personal data means any information relating to an identified or identifiable natural person. It can be a name, an identification number, location data, a subscriber or user number, a meter number or any other information relating to a person.

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<sup>1</sup> VIVAQUA's registered head office is located at Boulevard de l'Impératrice 17-19 – 1000 Brussels

## What does the processing of personal data involve ?

Processing of personal data means any operation performed on such data, such as collection, recording, processing or retention. Only data required for the stated purpose, i.e. for example, connection to the public water supply network, the supply of water, as well as connection to the wastewater collection network, invoicing, etc. are collected, processed, recorded and retained.

Such data may therefore include

- identification data such as your first name and surname, address, national register number, e-mail address, landline and mobile telephone number, bank account number, etc.
- data relating to your connections: serial number, meter number, meter reading, etc.
- data relating to the owners or other holders of rights in rem on the properties where connections are installed
- data relating to household composition, necessary in order to determine the appropriate tariff
- financial data: invoicing, payments, debt recovery, etc.
- data collected via VIVAQUA's call centres, including possible recordings of conversations with its employees
- data obtained from third parties, e.g. national register, land registry, mortgage registry, social networks, etc.
- video surveillance images recorded by fixed cameras in and around VIVAQUA's properties
- data collected via cookies. Cookies are essential for the proper functioning of VIVAQUA's website. They fulfil various functions: ensuring the security of the website, storing your preferences, collecting statistical data, adapting the content of the website according to your needs.

## When does VIVAQUA collect your personal data?

VIVAQUA collects your personal data when you contact the company, e.g. when you

- become a subscriber or user, following a connection
- become a customer, by requesting a water analysis, by using one of its commercial services, such as VIVAQUA Home
- give notice of a change of address, a change of subscriber or user
- contact the customer service department to obtain information, to update your information (e.g. a change in the composition of your household) or to complain
- participate in a survey or an event organised by VIVAQUA
- visit VIVAQUA's website and interact via social networks (e.g. Facebook, LinkedIn)
- apply online via VIVAQUA's website or via social networks
- contact VIVAQUA as a supplier.

## What is the legal basis for processing your personal data?

VIVAQUA processes your personal data only for the following purposes:

- public service remit relating to distribution, sanitation works and monitoring water quality
- the contractual relationship for services such as VIVAQUA Home, combating legionnaires' disease, requests for paid analysis, processing of personal data of its customers, suppliers, tenderers, the collection of your applications when you apply for a job, etc.
- VIVAQUA's legitimate interest in the processing of technical and security cookies for its website, the conduct of satisfaction surveys, the recovery of debts, the camera surveillance of its properties, etc.
- your consent, for statistical and marketing cookies as well as for the storage of your contact data in its recruitment database. You may withdraw this consent at any time.

## Why does VIVAQUA process your personal data?

VIVAQUA processes your personal data for

- the management of your connection and other work carried out in this context
- the management of relationships with subscribers, users, customers, visitors of its website and social networks: meter reading, invoicing, formalities when changing address, recovery of unpaid bills, customer relationship
- the management of your application when applying for a job
- maintenance and repairs on the distribution and drainage networks from technical distribution and sewerage sectors
- monitoring water quality (analysis)
- conducting satisfaction surveys
- responding to any lawful request from a court or regulatory authority to access your personal data
- providing advice, etc.

VIVAQUA does not process "sensitive" personal data such as, for example, data relating to ethnic origin, health, political opinions, religious or philosophical beliefs, membership of a trade union, sexual orientation or criminal convictions and offences.

## Camera surveillance

VIVAQUA has installed fixed surveillance cameras in and around its buildings to ensure your safety and the safety of its staff and its properties, and thus prevent fraud and other crimes that you and VIVAQUA may be victims of.

The use of these cameras complies with the law of 21 March 2007 regulating the installation and use of surveillance cameras and the applicable privacy regulations. The presence of the cameras is indicated by pictograms.

The images are viewed in real time and also recorded in order to allow the identification of incidents, to control access, possible break-ins or intrusions and, if necessary, to allow immediate intervention. Recorded images are kept for 30 days.

## Who can your personal data be transferred to?

VIVAQUA does not sell your personal data to other companies for direct marketing purposes.

VIVAQUA and its employees may access your personal data, only where required for operational reasons and for the purposes of customer service, in the course of performing their duties, such as, for example, to determine the appropriate tariff or to answer your questions.

For operational reasons, it is sometimes necessary for VIVAQUA to use carefully-selected third party companies, such as, for example, Doccle, for sending documents online. Within this context, any persons authorised to use your personal data are only permitted to do so in strict accordance with the instructions given by VIVAQUA and also undertake to protect and to not disclose it.

In certain circumstances, you will be able to interact with VIVAQUA through its website and its pages on social networks such as Facebook and LinkedIn. If you are connected to one of these social networks during your visit of VIVAQUA's website or if you interact with VIVAQUA through these social networks, the social network site may add this information to your respective profile on that network based on your privacy settings. If you wish to prevent this type of data transfer, please log out of your social network account before accessing VIVAQUA's website or change your account's privacy settings. Please read the privacy policies of these social networks for detailed information on the collection and transfer of personal information, your rights and how you can obtain satisfactory privacy settings.

## What rights do you have and how can you exercise them?

You have the **right to access** your personal data. VIVAQUA may therefore provide you with the following information in particular:

- the categories of personal data collected: identification data (national register number, name, residential address, telephone number, e-mail, etc.), location data (building address, etc.) and data relating to the use of the building (single-family home, hotel, cafe or restaurant, laundry, etc.)
- the purposes of the processing, e.g. connection to the water or sewerage networks, invoicing
- the categories of recipients to whom the personal data have been or will be disclosed, e.g. invoice management providers, lawyers, bailiffs, debt collection agencies, etc.
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.

You have a right to rectification of your personal data. If your personal data are incorrect, irrelevant or incomplete, VIVAQUA shall amend or complete them.

You have a right to erasure of your personal data. VIVAQUA shall delete the data to the extent legally or contractually permitted.

You have the right to object to any use of your data for direct marketing purposes. However, VIVAQUA does not use your personal data for promotional or marketing campaigns and does not, within this context, share your personal data with other organisations.

If necessary, you will also have the right to the portability of your data under the conditions provided for by the applicable data protection legislation.

Finally, you have the right to obtain from VIVAQUA the restriction of processing your data, in accordance with the applicable data protection legislation.

You may exercise your rights

- by post, by sending a copy of the front of your identity card to VIVAQUA, 17 - 19 Boulevard de l'Impératrice, 1000 Brussels
- by e-mail, by sending a copy of the front of your identity card to the e-mail address [info@vivaqua.be](mailto:info@vivaqua.be)
- by visiting the offices of the customer service department at VIVAQUA's registered head office at 17 - 19 Boulevard de l'Impératrice, 1000 Brussels and presenting your identity card.

## How long will your personal data be stored?

Your personal data and the information relating to the use of VIVAQUA's services are retained in accordance with legal requirements.

## Use of cookies

Cookies are used to ensure the security of VIVAQUA's website, to enable its users to be identified and to improve the provided services.

## How to contact the Data Protection Officer

VIVAQUA, the Data Controller, has appointed a Data Protection Officer (DPO) who is independently tasked, among other things, with ensuring internal application of the rules for the protection and management of your personal data and for cooperation with the Belgian Data Protection Authority.

Subscribers and customers have the right to lodge a complaint, regarding the processing of their personal data by VIVAQUA, to the Data Protection Officer

- by post, by writing to the Data Protection Officer, 17 - 19 Boulevard de l'Impératrice, 1000 Brussels, or
- by e-mail to the address [privacy@vivaqua.be](mailto:privacy@vivaqua.be).

If they do not receive a satisfactory answer, they may contact the Belgian Data Protection Authority, the competent body for Belgium.

## Changes to the Privacy Policy

VIVAQUA reserves the right to modify this Privacy Policy in order to comply with any obligations set down in privacy protection legislation or to adapt it to its practices. Users are therefore invited to regularly consult the Privacy Policy in order to familiarise themselves with any changes and adaptations.