



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 VIVAQUA¹ 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) and the law of 30 July 2018 on the protection of individuals with regard to the processing of personal data..

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.

¹ 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 deletion. VIVAQUA only processes data that are necessary for stated purposes, 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.

Therefore, the following categories of data are involved:

- identification data: your first name and surname, postal address, national register number, social security identification number ;
- electronic identification data : e-mail address, landline and mobile telephone number, connection identifiers, IP addresses;
- 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 on the status of the beneficiary of the social intervention ("BIM" status)
- data relating to household composition, necessary to determine the amount of social intervention to be granted
- financial data: bank account number, invoicing, payments, debt recovery, instalment plans, direct debit mandates;
- data obtained from third parties, e.g. national register, land registry, social security registry, mortgage registry, social networks, etc.
- video surveillance images recorded by fixed cameras in and around VIVAQUA's properties
- telephone records for quality purposes
- 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 , to determine whether you are a beneficiary of the social intervention or to complain
- participate in a survey or an event organised by VIVAQUA
- When you visit our premises or visit VIVAQUA's website, fill in our forms and interact via social networks (e.g. Facebook, LinkedIn)

- apply online via VIVAQUA's website or via social networks
- contact VIVAQUA as a supplier.

VIVAQUA also collects data directly from third parties (authentic sources such as the National Register, the Land Registry, the Crossroads Bank of Social Security, the Mortgage Register)

What is the legal basis for processing your personal data?

VIVAQUA processes your personal data only on the following legal grounds:

- public service remit relating to drinking water supply and sanitation, water quality monitoring and social intervention payment.
- 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, and the evaluation of the quality of service, etc.
- comply with the legal obligations to which VIVAQUA is subject, in particular with regard to the fight against unoccupied dwellings, the communication of information to the public authorities legally entitled to demand the communication of information.
- 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, manage instalment plans, 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, assess the quality of service
- responding to any lawful request from a court or regulatory authority to access your personal data
- ensure the safety of its facilities
- managing human resources
- communicate its advice, etc.

- meet its legal obligations

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.

We disclose your data to certain public authorities on the basis of an appropriate legal basis or to subcontractors who act under our responsibility pursuant to a contract.

For operational reasons, it is sometimes necessary for VIVAQUA to use carefully-selected third party companies, such as, for example, Doccle of Speos for sending documents. 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 some cases, the data collected may be transmitted to third parties responsible for collecting unpaid debts, such as bailiffs, lawyers etc.

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.
- the period for which the personal data will be processed.

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

Data relating to identification, consumption, customer relationship management, subscriber, user will be kept for 5 years after the relationship with the person concerned is terminated (e.g. moving or transfer of the real estate right on the connected building).

In order to comply with our legal obligations (to meet our accounting and tax obligations), financial data is kept for 7 years.

VIVAQUA keeps records of electronic communications for as long as required or permitted by law, including the period during which a dispute concerning these communications may arise. This applies to telephone conversations and electronic communications that customers have with the call center or customer advisors. Typically, conversations with the call centre are kept for one month, unless an event occurs during this period that triggers a need for a longer period (customer complaint, attempted fraud...).

Video recordings from surveillance cameras in and around VIVAQUA buildings are kept for a maximum of 30 days.

For data for which no legal retention period is foreseen, we do not keep your data longer than necessary to achieve the purposes defined in this Privacy Policy.

These retention periods shall apply unless the retention of data for a longer period is necessary to meet legal obligations or the public interest of VIVAQUA.

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.

For more information about this : <https://www.vivaqua.be/en/cookie-policy/>

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.

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.