

# VIVAQUA

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 26 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 are 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 number, a meter number or any other information relating to a person.

### What is involved in the processing of personal data?

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.

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

for example, connection to the public water supply network, the supply of water, as well as connection to the wastewater collection network, billing, 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 of properties where connections are installed.
- Data relating to household composition, necessary in order to determine the appropriate tariff: head of household, partner, children and the respective national register numbers.
- Financial data: billing, payments, etc.
- Data collected via VIVAQUA call centres, including possible recordings of conversations with its employees.
- Data obtained from third parties, e.g. national register, land registry or mortgage registry.
- Data collected via cookies. Cookies are essential for the proper functioning of our website. They fulfil various functions: storing your preferences, collecting statistical data, adapting the content of sites 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, following a connection.
- Become a customer, by using one of its commercial services, such as VIVAQUA Home.
- Give notice of a change of address.
- Contact the customer service department to obtain information, to update your information (e.g. a change to the composition of your household) or to complain.
- Participate in a survey or an event organised by VIVAQUA.
- Log in to the company's website.

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

VIVAQUA processes your personal data solely on valid legal bases:

- Public service remit relating to distribution and sanitation works.
- The contractual relationship for services such as VIVAQUA Home, combating legionnaires' disease, etc.

## Why does VIVAQUA process your personal data?

VIVAQUA processes your personal data for:

- Managing your connection.
- Managing relationships with subscribers: meter reading, billing, formalities when changing address, recovery of unpaid bills.
- Maintenance and repairs on the distribution and drainage networks from technical distribution and sewerage mains.
- Monitoring water quality (analysis).
- Conducting satisfaction surveys.
- Responding to any lawful request from a court or regulatory authority to access your personal data.
- Its 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.

## 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 online billing. 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.

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

You have the **right to access** your personal data. You may therefore request the following information:

- 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, billing.

- The categories of recipients to whom the personal data have been or will be disclosed, e.g. bill management providers, lawyers, bailiffs, 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.

We do not use your personal data for promotional or marketing campaigns and VIVAQUA does not, within this context, share your personal data with other organisations.

You may exercise your rights:

- By post, by sending a copy of the front of your identity card to VIVAQUA, Customer Service Department, 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 the company's registered office at 17 - 19 Boulevard de l'Impératrice, 1000 Brussels and presenting your identity card.

## For what period will the personal data be stored?

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

## Use of cookies

Cookies enable users of the VIVAQUA website to be identified and to improve the service provided to them.

## 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 submit a complaint, in relation to 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 response, 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.