

# Privacy Policy

## Anne-Sophie De Clercq — Owlet

This privacy notice outlines when, how and why I collect personal data. It defines how I use it, the limited conditions under which I may disclose it to others, and how I keep it secure according to the EUROPEAN GENERAL DATA PROTECTION REGULATION 2016/679 (GDPR).

Contact: [info@owlet.xyz](mailto:info@owlet.xyz)

### 1 – Client, supplier and collaborator data

Visitors to my website are not obliged to provide personal data. Nevertheless, anyone interested in my services can use the contact form or send me an email, and some personal data has to be collected in order to establish communication.

The legal basis for processing your data is to perform the services you request or to take necessary steps prior to fulfilling that request and complying with legal requirements. I collect, store and use such personal data for the purposes of managing the administrative side of my business, providing the services that you request and complying with legal requirements, not for promotional purposes.

#### Categories of data subjects

I hold data on clients, suppliers, collaborators, data processors and potential clients for legitimate interest.

#### Categories of personal data

Personal data collected may include your name, postal address, email address, telephone number, and ID or tax number, payment and delivery conditions, financial and bank account details.

The data in question will be retained throughout the business relationship only, or for the length of time stipulated to comply with legal and tax obligations (seven years).

#### Retention of personal data

I am obliged to retain your personal data for seven years to comply with Belgian tax requirements. After that time, just drop me an email and I'll delete every information I recorded about you and/or your company.

#### Third-Party Access

At your request, when working with colleagues, I anonymise the documents and information I share so that your personal data will not appear. The colleagues will be asked to sign a confidentiality agreement if necessary. They will be advised of their legal obligations in relation to confidentiality and professional secrecy.

Other parties may have access to your personal data for administrative purposes, including an accountant, an administrative assistant, or a website designer. All these parties are GDPR-compliant (please also see the section on security measures below).

#### Your rights and obligations

I take all precautionary steps to guarantee the security, integrity and confidentiality of your personal data in compliance with the EUROPEAN GENERAL DATA PROTECTION REGULATION (EU) 2016/679, in relation to the processing of personal data and the free movement of such data.

You are entitled to access, modify, erase or contest the personal data that I hold, in accordance with the above-mentioned EU regulation. Please send your request directly to [info@owlet.xyz](mailto:info@owlet.xyz), and I will act upon this as soon as possible, within a maximum of one month from the date of your request. Also feel free to drop me an email if you have any concerns about how I process your personal data. You have the right to lodge a complaint with the supervisory body in Belgium or in the country where you live.

#### Security measures



I take all possible precautionary measures to guarantee that your personal data is safeguarded in my computer, my back-up tools (USB sticks, external hard drives) and in the cloud ([LSP.expert](#)).

#### ***Updates to computers and devices***

The equipment used for storing and processing personal data is updated as frequently as possible.

#### ***Malware***

Anti-virus software is installed on the equipment used for storing and processing personal data, to prevent the theft or destruction of this information. This anti-virus software is regularly updated.

#### ***Firewall***

Firewalls are in place on all devices used for storing or processing personal data, to avoid remote unlawful third-party access.

#### ***Back-up***

Personal data is periodically backed up on a device other than that used on a day-to-day basis. The copy is stored in a secure place, separate from the computer containing the original files, so that personal data can be recovered in the event of loss or damage. Should this back-up be done via electronic methods, an encrypted method is used to guarantee the confidentiality of the personal data, in the event of unlawful third-party access.

#### ***Technical measures***

All electronic systems in use for storing or processing personal information are password protected.

#### ***Breaches of personal data***

In the event of a security breach of personal data, due to theft or unlawful access for example, I will notify the Belgian data protection agency (Autorité de protection des données) within 72 hours of this security breach. This will include all of the information necessary to clarify the circumstances under which this happened. Notification will be done electronically via their [online portal](#).

## **2 – Cookie Policy**

Like most websites, mine also uses cookies to collect data. Cookies are small data files which are placed on your computer (PCs, smartphones or tablets) as you browse. They are used to remember when your computer or device accesses this website, they help it operate effectively and improve your user experience.

The data collected includes pages viewed and your journey around the website. These cookies are not used to collect or record data on your name, address or other contact details.

You can disable the use of cookies by changing your browser settings. In doing so, some of the website services may no longer function properly.

This Privacy policy was updated on 25 November 2020 and will be reviewed as and when necessary.

Should any differences occur between the French and English versions, the French will prevail.

