



IDlegcy - Privacy and Cookie Policy

IDlegcy 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 and Cookie Policy (hereinafter the “Policy” or “Privacy Policy”), and the applicable standards of fair information practices.

This document offers you a description of how IDlegcy uses this data, as well as your rights associated with IDlegcy’s use of your data. This policy applies specifically to customers, applicants, suppliers, business partners, visitors of our website www.idlegcy.com or other persons who contact us (e.g. via contact form).

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 IDlegcy collects, uses and processes your personal information. If you do not accept this Privacy Policy, you are no longer allowed to use the website of IDlegcy. IDlegcy may access or use your data either with your express approval, to perform the services detailed in an agreement or for any lawful basis.

IDlegcy 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 this Policy, to make sure that you are aware of any changes.

Article 1 – GENERAL

- 1.1 IDlegcy, with registered offices in Belgium, Kastanjelaan 81, 9620 Zottegem and registered at the CBE with number 0686.716.547, and available via www.idlegcy.com takes responsibility for the processing of your personal data on the Website as a “data controller”.
- 1.2 This Privacy Policy for the protection of your personal data is strictly compliant with the European Union Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC (“GDPR”).
- 1.3 If you have questions about this Privacy Policy, or the manner in which IDlegcy collects, uses or otherwise processes your personal information, please contact us by sending an email to the following e-mail address: privacy@idlegcy.com

Article 2 – WHICH PERSONAL DATA DOES IDLEGCY COLLECTS?

2.1 IDlegcy may collect personal data that is provided by you or by third parties to the extent necessary or useful for the operation of the website or its services. Such information may consist of:

Activity	Personal data	Legal basis	Context
Visiting the website	<ul style="list-style-type: none"> • IP address • Cookies • Connection moments • Web pages • Click-behaviour, logs • Usage data 	<p>Consent</p> <p>Necessary for the performance of an agreement</p>	<p>IDlegcy may collect usage data and other data about your interactions with the IDlegcy website. This data is being collected by means of cookies (see art. 7 Cookies).</p>
Subscribing to the newsletter	<ul style="list-style-type: none"> • E-mail • Name 	<p>Consent and</p> <p>Legitimate interest of the controller</p>	<p>When you subscribe to our newsletter, you will be included in our mailing list and will receive our newsletter. At any moment you can unsubscribe from the newsletter by clicking the unsubscribe-link, included in every e-mail communication.</p>
Contacting IDlegcy	<ul style="list-style-type: none"> • Name • E-mail • Phone number 	<p>Necessary for the performance of an agreement</p>	<p>When you contact IDlegcy via the contact form on the website, IDlegcy collects the information you provide to us.</p>
Doing business with IDlegcy	<ul style="list-style-type: none"> • Name • E-mail • Phone number 	<p>Necessary for the performance of an agreement</p> <p>Legitimate interest of the controller</p>	<p>IDlegcy collects contact details of contact persons working for a (potential) customer or (potential) supplier of IDlegcy in order to provide the ordered products or services. An example of this practice is when a contact person hands out his business card at a food fair.</p>

2.2 IDlegcy does not collect sensitive personal information of its visitors, customers or suppliers (e.g. data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation). IDlegcy shall, where necessary, obtain your explicit consent to collect and use such information.

2.3 You are not obligated to provide us with your personal data, however, the performance of several services may not be possible if you choose not to provide your personal data.

Article 3 – HOW WILL MY PERSONAL DATA BE USED?

3.1 General Purpose

IDlegcy collects and processes your personal information in order to offer you a safe, comfortable, and personalized experience each time you visit the website or utilize our services.

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.

With that said, your personal data will only be processed for the following (internal) purposes:

Activity	Purpose
Applying for a job	We collect these data to evaluate your application and allows us to pursue a recruitment policy.
Visiting the website	We collect these data to provide you with a better user experience when you visit our website and allow us to optimize our website. The information collected by cookies on the website is also used for online marketing purposes (see art. 7 Cookies for more information). Certain data, such as logs, allows us to resolve any problems/bugs you report.
Subscribing to the newsletter	We collect your e-mail address to send you the newsletter you have subscribed to. The newsletter allows us to inform you about our food products and services.
Contacting IDlegcy	We collect this data to respond to your question or concern.
Doing business with IDlegcy	We collect these data for the purpose of executing the agreement, maintaining the professional relationship between you and IDlegcy.

3.2 Direct marketing:

IDlegcy may also use your personal information for the purpose of marketing our products and services. If you do not want to receive marketing material from us, you may opt out or exercise your right to object (Article 5) by sending us an email to privacy@idlegcy.com.

3.3. Transfer of Personal Data

In order to process your personal data, we provide access to our employees.

IDlegcy will not disclose your personal data to third parties, unless it is necessary in the context of providing our products or services and/or optimising them. To that end, IDlegcy may

disclose your personal data to third parties who assist IDlegcy 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 analyse the data. Furthermore, it may be necessary to provide the personal data to a third party in order for IDlegcy 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 IDlegcy. Any other use is not included and is prohibited.

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

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

- If IDlegcy 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 IDlegcy's activities, whereby IDlegcy reorganizes, transfers or ceases business activity, your personal data may be transferred to new entities or third parties.

Article 4 – HOW LONG WILL WE HOLD YOUR PERSONAL DATA?

IDlegcy 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. Based on the activities described in Section 2.2, we hold your data associated with these activities as follows:

Activity	Retention period
Applying for a job	No longer than 10 years after the last qualitative contact with the applicant
Visiting the website	With regards to cookies the retention period may vary depending on the specific cookie, ranging from 1 to 3 years. Other electronic identification data will be kept no longer than 7 years.
Subscribing to the newsletter	Your e-mail address will be kept for as long as you wish to receive the newsletter.
Contacting IDlegcy	IDlegcy will hold the data for 10 years after your first request.
Doing business with IDlegcy	No longer than 7 years after the end of the professional relationship.

Article 5 – YOUR RIGHTS AS A DATA SUBJECT

5.1. 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 IDlegcy.

5.2. Right to rectification, erasure, or restriction

You have the choice to share your personal data with IDlegcy. You also have the right to request IDlegcy 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.

5.3. 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 [\[hyperlink to webpage\]](#). Be sure to provide your name, relevant contact information, and specific relevant information about IDlegcy 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 IDlegcy where accepting the communications is a condition of receiving the services.

5.4. Right to data portability

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

5.5. Right to withdraw consent

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

5.6. Automated decisions and profiling

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

5.7. 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@idlegcy.com.

5.8. Right to file a complaint

If you have any complaints about the way IDlegcy 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 IDlegcy:

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.

Article 6 – SAFETY AND CONFIDENTIALITY

6.1 IDlegcy 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 (password policy, BYOD policy, teleworking policy,...)
- All data is stored on secure datacentres

6.2 In the unlikely and unfortunate event that your personal information under IDlegcy's control is compromised by an information security breach, IDlegcy will immediately act to identify the cause of such breach and take action through adequate remedial measures. If necessary, IDlegcy will notify you as well as the Data Protection Authority of this incident in accordance with applicable law.

6.3 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. IDlegcy 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 IDlegcy expressly disclaims any and all liability in connection with user content to the fullest extent permitted by applicable law.

6.4 IDlegcy assumes no responsibility regarding the privacy policy of the websites or digital platforms that are linked on the website. Moreover, IDlegcy 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.

Article 7 – COOKIES

7.1 What is a cookie?

A “cookie” is a small text file that can be sent from a web server to your computer that is then stored on your computer. When a cookie is stored on your computer each subsequent request to the same domain name will also send along the data stored in the cookie until the cookie expires or is deleted. A server can only give you a cookie if you make a request to that server. The cookie is only stored if your browser/client is configured to store cookies.

7.2 Why do we use cookies?

Cookies help provide additional functionality to the site or to help us analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In order to manage the website, IDlegcy collects information on the IP address used when the computer that a user is using connects to the Internet.

We only use the IP addresses collected through the website to ensure the appropriate and secure management and operation of the IDlegcy’s services. In addition to preventing unauthorised access, the collection of IP addresses enables quick identification of the cause and restoration of normal operations in the event of a failure of the website. We do not use or disclose IP addresses in connection with individuals’ personal information.

While we collect information on how you use the website’s services, we preserve the anonymity of individual users in the use or disclosure of this information. However, when we deem it necessary for the protection of the website or of its users/visitors, we may implement measures by using IP addresses to identify individuals.

In addition to the earlier mentioned cookies, the website also uses cookies from trusted third parties (including Google analytics and Facebook pixel). For cookies placed by third parties please refer to the policies that these parties provide on their respective websites. Please note that we do not have any influence on the content of these policies or on the content of these third party cookies.

- **Google analytics** which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

- **Facebook pixel** allows us to contact you via Facebook and Instagram and divide website visitors into groups. Based on this pixel, IDlegcy can contact you back on Facebook and/or Instagram.
- **Social media plugins** allow you to connect with your social network in various ways. For these to work the following social media sites including; Instagram, Facebook, Twitter, LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

7.3 Kinds of cookies we use:

- **Strictly necessary cookies** - As the name suggests these cookies are strictly necessary to enable you to move around or remain logged into the websites or to provide certain information that you have requested.
- **Tracking cookies** - These cookies are used to record information such as how a visitor initially came to a website and how long they stayed and which pages they viewed. These tracking cookies are also third-party cookies (see below).
- **Third party cookies** - For cookies set by third parties we kindly refer you to the statements set forth by these parties on their respective websites. Beware, we do not have any influence on the content of these statements nor on the content of the cookies of these third parties. Though these cookies can also be disabled by browser settings.

7.4. Your permission

When you first visit our website, you express your implicit approval to accept our different kinds of cookies.

You can block cookies by altering your browser's settings. The rejection of these cookies may inhibit some functionalities on the Websites.

Currently, some browsers offer a "do not track" or "DNT" option which sends a signal to websites visited indicating a visitor's tracking preference. IDlegcy does not currently respond to these signals, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators. The third-party providers IDlegcy uses may or may not do anything in response to this signal.

More information on cookies can also be found via the following link: <http://www.allaboutcookies.org/>

More information on online behavioral advertising and online privacy can be found via the following link: <http://www.youronlinechoices.eu/>

Article 8 – 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.

Article 9 – QUESTIONS

Questions, comments and requests regarding this Policy are welcomed and should be addressed to

IDlegcy NV
Kastanjelaan 81
9620 Zottegem

Or electronically to **privacy@idlegcy.com**