

Privacy Statement FCR Media

This statement is effective as of May 25, 2018.

For FCR, the privacy of its customers is very important. Therefore, we want to be transparent about what personal data we collect from you, why we collect it and what we do with it. In addition, we want you to know your rights in relation to this personal data. For these reasons, we strongly recommend that you read this Privacy Statement and contact us if you have any questions.

1. Definitions

The following definitions will help you better understand the Privacy Statement:

- "We", "Our", "Us", refers to

FCR Media Belgium NV, or "FCR".

Uitbreidingstraat 82, 2600 Berchem

0807.677.428.

<https://fcrmedia.be>

info@fcrmedia.be;

- "You", "Your" refers to a website visitor, job applicant, customer or potential customer;

- "Personal data" refers to any information that identifies you (directly or indirectly) as an individual;

- "Website(s)" refers to <https://fcrmedia.be>, <https://www.goudengids.be>, <https://www.wittegids.be>, <https://dexville.be> and/or <http://careers.fcrmediabelgium.be> as well as any web pages, platforms, interactive features, applications, widgets, blogs, social networks, social media tabs or other offers that link to this Privacy Statement.

2. What is the scope of application of this Privacy Statement?

This Privacy Statement applies to all personal data of website visitors, job applicants, customers and potential customers collected and used by FCR. This includes information that FCR collects through its Websites, information that our (potential) customers provide spontaneously, as well as data collected offline for commercial use, which is managed by us.

This Privacy Statement has been drafted and is kept up-to-date in accordance with the provisions and requirements of the privacy legislation, the 'Algemene Verordening Gegevensbescherming' (abbreviated "AVG", in English General Data Protection Regulation, abbreviated 'GDPR'). This means that FCR processes personal data in accordance with the principles for processing as described in the GDPR.

3. Who is responsible for your personal data?

FCR Media Belgium NV, Uitbreidingstraat 82, 2600 Berchem, Belgium, is the responsible party for processing your personal data.

4. What data do we collect from you and for what purpose?

4.1. Processing of personal data included in the golden pages and white pages

One of the services of FCR is the publication and distribution of the golden pages and the white pages. This concerns the distribution of guides in printed form (paper guides) as well as in electronic form (internet, smartphones, etc.). The following personal data may be processed: surname and first name, address, email address, telephone number, photos and payment details. The data we use for the publication of the golden and white pages comes from our database, where it is supplemented with information from other sources, including the Crossroads Bank for Enterprises.

For the commercial advertisements in the golden pages, the processing of personal data is lawful because of the existence of an agreement between you and FCR. This agreement can also be entered into by telephone. In this case you will be explicitly asked whether the conversation may be recorded as proof of the existence of the agreement. If you do not want to give permission, the conversation will not be recorded and the agreement will be sent to you by email for signature. For the free notifications, the publication is lawful due to a legitimate interest of FCR. You can decide at any time to no longer make use of this free notification, see “10. Where to go with questions or complaints” of this Privacy Statement.

The publication of the white pages and the personal data contained therein is lawful because FCR is performing a task of general interest. The personal data included in the white pages is only used for their publication. You can at any time decide to no longer be mentioned in the white pages, see “10. Where to go with questions or complaints” of this Privacy Statement.

If you no longer wish to receive the paper version of the golden and/or white pages, we will need your personal data so that we can ensure that we are processing the request of the right person and not erasing the wrong person from our database. For this purpose, we ask you to provide the following information: surname and first name, address, telephone number and email address. You can unsubscribe here.

In addition to the processing of the above-mentioned personal data for publication and distribution of the golden and white pages, this data is also transferred to a partner who is in the process of developing a platform that allows both SMEs and individuals to manage their (company) profile, contact details and (possible) approval for the processing of their personal data under the GDPR by third parties. FCR believes it can invoke the legitimate interest for the transfer of data to this partner in view of (i) the particular nature of the (personal) data concerned (i.e. data relating to natural persons always acting in a professional/commercial context) and (ii) the fact that FCR may reasonably assume that the persons concerned do not object to the transfer of their data to a partner that increases the online visibility of their business or professional activity and gives them the opportunity to manage their business in compliance with the GDPR. You can object at any time to the processing of your data by our partner, see “10. Where to go with questions or complaints” of this Privacy Statement.

4.2 Processing of personal data when providing our digital marketing services

In addition to the publication of the golden and white pages, FCR also provides many digital marketing services. We design websites, increase the online visibility and findability of your company, make sure you are visible with the right data, make company videos, offer an online reservation system, place your advertisements on social media sites and advertise via search engines such as Google, so that your company appears above other search results. The following personal data may be processed: first name and surname, address, email address, photos, videos, telephone number and payment details. Depending on the service and the advertising medium you have chosen and the information you have provided us with, more or less information may be published. This includes logos, websites and other company-related information. The processing of personal data in the execution of these services is necessary so that we can display the right information about your company online and so that we can correctly administer the contract you have signed with FCR.

The processing of data is lawful because of the existence of this agreement. For some of the services mentioned above, you have the possibility to manage your purchased product yourself and to modify certain data. Access is gained by entering a user name and password. This possibility only exists for our services Websites and Netsync. For services where you cannot change the data yourself and still want to see it changed, please contact our customer service.

By means of, among other things, cookies, Facebook pixels and/or certain algorithms that are processed in the products purchased by you, FCR can process the following data of your customers: IP address, location data, type of device, browser type and/or operating system and search, surf and click behaviour. FCR only uses this data to provide you with statistics regarding your products in an anonymised way.

4.3 Processing of personal data when offering an online (CRM) platform for optimal customer management

If you have decided to use the online (CRM) platform for optimal customer management offered by FCR, FCR must process the following data in order to create your account: name, telephone number, address, email address. The processing of data is lawful due to the existence of this agreement.

FCR has access to all personal data entered into the platform by you (or your customers), but will not use it for own purposes (commercial or otherwise). All data in the platform is accessible by FCR in order to (remotely) ensure an optimal service to the client (e.g. adjustment of settings/preferences, demonstration of the capabilities of the platform, etc.).

4.4 Processing of personal data by provision of data to other companies that commercialise data (data partners)

FCR may commercialise and provide data from its databases to data partners for the following purposes:

Direct marketing purposes of data partners: sale of data, use of data for marketing purposes or file building by order of third parties, use of data for validation and for file enrichment;

Offering statistical analysis products and publication or sale of these analyses by data partners;

Commercialisation of data elements by data partners that have been created by matching the data from our database with other data sources of those data partners.

The following personal data may be processed: name and first name, address, email address, telephone number, gender, financial data and company-specific information. It is contractually agreed with these data partners that they may only use this data for the above-mentioned specified purposes.

For customers, the transfer of this data to data partners is an integral part of the services you have chosen and of FCR's general terms and conditions of sale, and is also intended to increase the visibility and awareness of your company. The processing here is lawful because of the agreement you have entered into with FCR. You can always ask FCR to stop sharing your data with data partners. Also for those companies who do not have an agreement with FCR and only use the free notifications, there is the possibility to request that your data is no longer shared with our partners, see point "10. Where to go with questions or complaints" of this Privacy Statement.

4.5 Processing of personal data in MyMedia

FCR offers a MyMedia platform. Currently, access to the platform is only offered to new customers. Eventually, it is intended that all of our customers will be able to use it. The MyMedia platform gives you an overview of the services you use and have used in the past from FCR, and provides you with statistics on how the service works for your business. In addition, the following personal data about you will be displayed on your profile page: surname and first name, address, email address, telephone number, payment details and an overview of your invoices, payment status and an overview of your concluded contracts. We use this information to give a good overview of what information we use from you for the execution of the agreement we have concluded with you. You can also adjust this information in MyMedia yourself if it is incomplete or incorrect. Access to your account on MyMedia is disabled at the end of the agreement. Cookies are also installed on the MyMedia platform.

4.6 Processing of personal data of users of our Websites

FCR processes personal data via the Websites at various times. This is the case when, for example, you surf our Websites or use the search engine on the Websites. By means of, among others, cookies, Facebook pixels and/or certain algorithms, FCR can process the following data: IP address, location data, type of device, browser type and/or operating system and search, surf and click behaviour. FCR uses this data so that you can make full use of our Websites.

Also when you write a review on our Websites, FCR will process the personal data provided by you, in particular your name and/or email address. Finally, if you make an appointment or

request a quotation from one of our advertisers via our Websites, FCR will process your email address (as well as the date and time of your request) to ensure proper follow-up of the requested appointment/quotation. FCR may lawfully process this personal data based on the consent you give when submitting the review, your request for a quotation or request to schedule an appointment. You can withdraw this consent at any time, see “9.7. *Right to withdraw your permission*” and “10. *Where to go with questions or complaints*” of this Privacy Statement.

4.7 Processing of personal data for FCR direct marketing purposes

You can always subscribe to one of our newsletters. By means of our newsletters we can keep you informed about FCR's services and about changes and evolutions that occur in the market. We also like to inform existing customers about products and services which are similar to those they have bought from us. We use the following personal data for this purpose: surname and first name, address, email address, telephone number and information about the services you purchase from FCR. This way we can make the information more interesting and personal to you. We may also use this information to invite you to events and training sessions we organise. We also use social media channels to promote our services and events. You can decide at any time to stop receiving these communications, see section “9.7. *Right to withdraw your permission*” and “10. *Where to go with questions or complaints*” of this Privacy Statement.

4.8 Processing of personal data through reporting

FCR also uses your data to create reports and perform analyses in order to gain more insight into its services and to improve its way of working. The following personal data is processed: surname and first name, address, email address, telephone number, financial data and information on the services you use from FCR or are interested in. The processing of this data in order to improve our services and our service offering is lawful due to FCR's legitimate interest in this improvement of services.

4.9 Processing of personal data in case of spontaneous applications

Via our website <http://careers.fcrmediabelgium.be> you can apply spontaneously for one of our vacancies. In doing so, we ask you to provide the following personal data: surname and first name, gender, native language, date of birth, the municipality where you live, email address, telephone or mobile phone number, your preference regarding the department where you want to be employed, your CV and a motivation letter. If there are temporarily no vacancies of interest to you, you may also leave the above data to be contacted later when there is a new vacancy. The processing of this personal data is lawful because of the permission you have given. The data will only be used for application and recruitment purposes. You can withdraw your consent at any time, see “9.7. *Right to withdraw your permission*” and “10. *Where to go with questions or complaints*” of this Privacy Statement.

4.10 Processing of personal data for data quality and CRM purposes

FCR receives data from third parties for the purpose of enriching its own databases. This way FCR can verify the correctness of the data in the databases and guarantee the quality of the databases. This is necessary so that we can publish the right information and include the right information in our products (e.g. on the website we create for you). We also use data to inform potential customers about our services and products. Potential customers can also take initiative and let us know that they are interested in our services and products. They can do this by leaving their details via "add your company". The following personal data can be processed here: surname and first name, address, email address, telephone number, gender, language, financial data and company-specific information such as company name and company number.

FCR only receives personal data for which the third party has a valid justification to transfer this data (e.g. consent of the person concerned or a legal obligation). The processing of this data is necessary for FCR to fulfil its obligations according to the agreement between you and FCR. The processing of data received via "add your company" is lawful as it is based on your consent. You can withdraw this consent at any time see *"9.7. Right to withdraw your permission"* and *"10. Where to go with questions or complaints"* of this Privacy Statement.

FCR also uses your personal data for certain CRM activities, namely in the context of customer retention and when sending satisfaction surveys. In the context of customer retention, the following personal data is processed: surname and first name, telephone number, email address and payment details. For satisfaction surveys, we use the following personal data: surname and first name, telephone number and email address. The use of this personal data for both purposes is justified by existence of legitimate interests for FCR.

4.11 Processing of personal data by our customer service

For all your questions, remarks or complaints about our services, you can contact our customer service. You can also contact the customer service if you want to change certain information about your company (or yourself) in the service you purchased from us. You can fill out a contact form which you can find [here](#). This form will then be sent to our customer service. Or you can simply call or email our customer service. The following data may be collected: surname and first name, email address, telephone number, address, company information and information about your question. FCR only uses this data to be able to respond to your question or complaint in the best possible way. The use of personal data for this purpose is justified by the existence of a legitimate interest for FCR.

Incoming telephone calls to our customer service are recorded for training and coaching purposes. The recordings are not kept longer than strictly necessary and are not accessible to unauthorised persons.

You may also be called by our customer service team as part of the follow-up to your programme. During the call, the following data may be collected: surname and first name, email address, telephone number, address, company information. FCR only uses this data to optimise its services/products. The use of personal data is justified by the existence of a contract with FCR. If the conversation is recorded for training and coaching purposes you will

be informed at the start of the conversation. You can always object to the recording of the conversation if you wish to do so. The recordings are not kept longer than strictly necessary and are not accessible to unauthorised persons.

FCR can make use of (sub) processors for the processing and further follow-up of customer questions. For more information on this subject we refer you to point 6 of this Privacy Statement.

When you visit our Websites, a pop-up may appear that allows you to chat "live" with one of our staff members. FCR may lawfully process the personal data that you would provide during a chat session (e.g. name, address, telephone number, ...) as FCR has a legitimate interest in doing so.

4.12 Processing of personal data for billing purposes

If you have purchased a paid service from us, we need personal data from you for billing purposes. This personal data is surname and first name, email address, company address, invoicing address, payment details and bank account number and sometimes your telephone or mobile phone number. The processing of this data for billing purposes is lawful because of the agreement you have entered into with FCR.

4.13 Processing of personal data for FCR promotional purposes

Provided you have given your explicit consent, FCR may use the following personal data for the purpose of promoting the company (e.g. through testimonials, photographs, videos, quotes, etc.): surname and first name, address, telephone number, email, photograph, video. You can withdraw this permission at any time see point "9.7. *Right to withdraw your permission*" and "10. *Where to go with questions or complaints*" of this Privacy Statement.

4.14 Processing of personal data to comply with legal obligations

FCR also processes personal data to comply with the laws and regulations applicable to FCR. These include, among others, regulations on accounting and taxes, labour law, ... It is possible that, in order to comply with these legal provisions, your personal data will be shared with other authorities.

4.15 Processing of personal data for the security of the company building

In order to monitor the company building and control who enters the building, a (surveillance) camera was installed in the entrance hall of FCR. Employees, visitors and suppliers of FCR are informed about this by the appropriate pictograms, which are hung up in clearly visible places. The camera images can only be consulted in real time and are not stored. FCR can lawfully process the recorded images on the basis of legitimate interest.

5. Data provision to third parties

FCR shares your data with third parties, including for the purposes described in “4.4. *Processing of personal data by provision of data to data partners*”. You can object to this processing at any time see “10. *Where to go with questions or complaints*” of this Privacy Statement. In addition, your data will only be shared with third parties if FCR is obliged to do so under applicable laws and regulations, e.g. with the police in the context of a criminal investigation.

FCR does not provide personal financial information (such as credit card information) to other parties unless this is necessary to handle your service request, process our invoice, or prevent or combat fraud.

Sometimes our Websites contain links to other websites. You should carefully read the privacy policies on those sites, which differ from our Privacy Statement.

6. Processors

FCR may make use of other service providers for the processing of personal data, who will act as processors exclusively on behalf of FCR. These processors are not allowed to use this personal data for their own (commercial) purposes. FCR selects these partners carefully and expects that they will handle your personal data with the same level of consciousness as FCR does itself. We enter into a processing agreement with these processor(s) in which the processor is obliged to comply with the obligations of this Privacy Statement as well as the provisions of the GDPR.

The preceding section also applies to processors who offer systems/tools in which the (central) processing (e.g. storage, update, correction,...) of personal data in the possession of FCR takes place. Such data systems/tools are necessary to support the various services/products offered by FCR.

7. Security of your personal data

We acknowledge our responsibility to provide an appropriate level of security for the information you entrust to us. FCR has therefore implemented various measures to protect personal data against loss, misuse and unauthorised access, disclosure, alteration or destruction. At organisational level, measures include limited access to and monitoring of the premises, systems and files; but also technical measures including firewalls, protection by means of personal passwords and verification, as well as verification requirements for access to personal data on a need-to-know basis are provided.

We also expect our processors to ensure an appropriate level of security when processing personal data on behalf of FCR. We also contractually stipulate this with all our processors.

8. How long do we store your data?

FCR has developed a policy on storage of personal data. We ensure that the data is stored in a secure manner and that we do not keep it longer than necessary to achieve the aforementioned

purposes. The storage period of the data therefore depends on the purpose for which it has been collected. If you want FCR to stop keeping your personal data or you want more information about the storage periods we apply, you can contact our customer service. You can read exactly how to do this under “10. *Where to go with questions or complaints*” of this Privacy Statement.

9. What rights do you have and how can you exercise them?

FCR uses personal data of its customers, prospective customers, applicants and website visitors for specified purposes and only collects the personal data it actually needs to achieve those purposes. We want to be as transparent and clear as possible about the activities for which we collect, use and safeguard your personal data. Consequently, FCR has developed a policy to enable you to exercise your rights with respect to the personal data you have entrusted to us. In accordance with the applicable privacy law, you have several rights.

9.1 Right to consult your data

You have the right to ask FCR at any time what data we have of you and what we use it for, and you may request a copy of it. You can also ask how long we keep your data, on what legal basis (consent, agreement, legal obligation, legitimate interest, general interest, vital interest) we process your data, etc. By exercising this right, you can also check whether the data we have of you is correct. You can read how to exercise this right under “10. *Where to go with questions or complaints*” of this Privacy Statement. If you have a MyMedia, Websites or Netsync account, you can always find an overview of the data we have about you there.

9.2 Right to correct your data

If you notice that the personal data we have of you is incorrect or incomplete, you can have it corrected or supplemented. You can do so by contacting customer service by email or by filling in a contact form. If you have an online account at MyMedia, or if you have purchased our Website or Netsync product, you can also correct or supplement certain personal data yourself.

9.3 Right to have your data deleted

You have the right to request that FCR deletes the personal data it has of you. Please note, however, that this right does not apply absolutely. The GDPR defines the conditions under which this right can be exercised. Customer service will assess whether one of the conditions is met. If it is judged that one of these conditions applies, your personal data will be deleted. If your data has been transferred to our processors for certain purposes, FCR will inform all these processors that the data must also be deleted by them. Please note that if you request to exercise this right, all your personal data kept by FCR will disappear. If you later wish to use our services again, you will have to communicate some of this data again.

You can read how to exercise this right under “10. *Where to go with questions or complaints*” of this Privacy Statement.

9.4 Right to request limited processing of your data

By requesting limited processing of your personal data, FCR will still be able to store data, but the use of data will be limited. Exercise of this right is only applicable in limited cases. If FCR still wishes to do other things with your data than merely retain them, this will only be possible in limited cases (e.g. by again requesting your consent to the processing of your data). You can read how to exercise this right under “*10. Where to go with questions or complaints*” of this Privacy Statement.

9.5 Right to object to the processing of your data

You have the right to object to the processing of your data if this processing is based on a public interest or the legitimate interest of FCR. Under “*4. What data do we collect from you and for what purpose?*” you can find the activities for which FCR has a legitimate interest or a public interest. If you invoke this right, FCR will examine whether its legitimate grounds for such processing outweigh your interests, rights and freedoms. If this is not the case, FCR will no longer process your data for that purpose.

You can also object to the processing of your personal data for direct marketing purposes. If you invoke this right, FCR will no longer process your data for marketing purposes.

You can read how to exercise this right under “*10. Where to go with questions or complaints*” of this Privacy Statement.

9.6 Right to the transferability of your data

This right means that you can recover the data that you have given to FCR. However, this right only applies to data processing that is based on your consent (e.g. consent to sending the newsletter) or on a contract (e.g. contract you enter into when purchasing a digital marketing service from FCR). An additional aspect of this right is that you can go to another data controller with the data that is returned to you without FCR being able to object. Please note that this only concerns the data that you have provided directly to FCR. You can read how to exercise this right under “*10. Where to go with questions or complaints*” of this Privacy Statement.

9.7 Right to withdraw your permission

As mentioned above, for all processing operations for which FCR requests your permission, you may withdraw your permission at any time. Please note, however, that withdrawing your permission does not affect or prejudice the processing operations carried out by FCR when your permission was not yet withdrawn. You can withdraw your permission in several ways:

You can unsubscribe from newsletters, direct marketing campaigns and other customised information via the unsubscribe link that is always included at the bottom of sent newsletters and other communications.

You can unsubscribe from receiving the paper version of the gold and white pages here online.

You can fill in the contact form that is handled by our customer service. You can use this contact form to ask to withdraw your permission to receive communication about vacancies if you have applied spontaneously at FCR. But you can also use the contact form to unsubscribe from newsletters, direct marketing or other customised information.

Please note that a certain processing time is needed to process your request and that in the meantime there is a chance that you may receive the information one last time. This processing time will be kept to a minimum.

10. Where can you ask questions or make complaints?

As previously stated in the explanation of your rights, you can exercise your rights by filling in a contact form which will then be dealt with by our customer service. In addition, you can always contact customer service by email for questions or complaints about the processing of your personal data or questions about this Privacy Statement. You can also send an email to info@fcrmedia.be with your question or complaint. We ask you to provide us with some information as well as what right you wish to exercise or what question or complaint you have regarding the processing of your personal data.

We ask you for your personal data so that we can identify you uniquely in our systems and certainly not share any personal data with persons pretending to be someone else. We will ask you for the following information: surname and first name, address, company, VAT number and customer number (in case you use your company to purchase services from FCR), telephone number, email address, what right you wish to exercise and additional information concerning your question or complaint. All requests will be forwarded to the customer service. As soon as they receive your request, they will send you a confirmation email that your request is being dealt with. You will receive a final answer within one month after receipt of your question by the customer service.

We will do our utmost to answer or resolve your questions and complaints in the best possible way. If, after this, you are still dissatisfied with the way in which we handle your personal data, you can find more information about the steps you can take on the website of the Data Protection Authority.

11. Applicable law

This Privacy Statement is governed by Belgian law. All disputes arising out of or in connection with this Privacy Statement will be referred exclusively to the competent courts of Antwerp.

12. Changes to this Privacy Statement

FCR reserves the right to make changes to this Privacy Statement. Each adjustment will be published on this page. We recommend consulting this Privacy Statement regularly so that

you are always aware of the content of the current Privacy Statement. FCR cooperates with other partners for various services. FCR is not responsible for the privacy policy of these partners and is not responsible for the content of their privacy statement. We therefore advise you to consult the privacy statement of these partners for further information.