

# Privacy Policy

Version 2.0

Date: 20/01/2021

## 1. WHO?

This Privacy Policy applies to personal data processed through the website and as part of the main activities of the Controller. The Controller is BREWERY THE MUSKETEERS BV with its registered office at 9170 Sint-Gillis-Waas, Reepstraat 208, with company number BTW BE0862.949.612, which can be contacted via [info@themusketeers.be](mailto:info@themusketeers.be).

The party responsible for processing will do its utmost to respect your privacy rights. The Controller hereby complies with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (hereinafter "GDPR") and/or any future or additional legislation applicable.

## 2. WHAT ARE PERSONAL DATA?

Personal data is any data that allows a natural person to be identified or identifiable. This includes contact information such as your name and email address, but also social media account usage data, your IP address, your preferences, financial data, sensitive data, ...

## 3. WHAT PERSONAL DATA DO WE PROCESS?

The following personal data may be processed:

### 3.1 Personal data we process through the website:

- Location data
- Usage data via cookies (see cookie policy for more details)
- E-mail address (via registration form newsletter)
- Name (via newsletter registration form)
- Choice of language (via newsletter registration form)

### 3.2 Personal data we process through the brewery café, events, trade shows or the brewery visit:

- Name and contact details
- Reservation data
- Payment details
- As part of Covid19 measures, data such as name and contact details may be temporarily held in accordance with the legal obligation

### 3.3 Personal data that we process in the context of the brewery

- Customer Name
- Contact details
- Delivery details
- Payment and billing details
- Order history, customer history
- Correspondence

### 3.4 Personal data that we process in the context of application through the website:

- Name and contact details
- Data you provide us with (CV, letter of recommendation, additional documents)
- Data obtained as part of the selection process

### 3.5 Personal data that we process through our social media channels

If you become a member of our company pages, we may consult your name and profile data.

## **4. WHAT WILL THE PERSONAL DATA BE USED FOR?**

### **4.1 Processing purposes:**

Personal data is processed exclusively within the framework of the company and in particular for the following purposes:

- Operating the brewery
- Operating the brewery café
- Organizing events, brewery visits, meetings
- Participate in fairs
- Fulfilment of administrative and fiscal obligations
- Communication with customers and prospects

### **4.2 Legal grounds for processing:**

We may process your personal data for the following purposes:

#### **A. Legal obligation:**

To comply with the obligations imposed on the Controller under legal and administrative obligations;

To comply with tax and accounting obligations.

This enumeration is not exhaustive and is subject to change.

#### **B. Necessity for the performance of the agreement:**

##### ***Pre-contractual phase:***

- Contacting, scheduling, responding to an order, negotiating;
- Providing and/or requesting information as part of entering into an agreement;
- Drafting of agreements.

##### ***Contractual phase:***

- Customer management;
- Supplier Management;
- Execution of the contractual order.

#### **C. Legitimate interests:**

Sending newsletters to customers of the Company.

Improving the quality of our services, training employees, and evaluating and maintaining data and statistics related to the activities of the Controller, in the broad sense.

Preserving and using evidence in the context of liability, proceedings or disputes and with a view to archiving the company's activities.

Ensuring security, both online on this website and in our premises.

**D. Consent:**

Sending a newsletter to prospects of the company.

Posting photos containing personal data on the company's website and social media channels.

Data of applicants after the recruitment process will be kept only with permission.

**4.3 Method of processing**

Your data will always be treated confidentially and will not be traded, sold, rented or passed on to third parties outside the contractual relationship or a specific assignment.

In order to be able to offer its services, the Controller may be assisted by a selective number of processors. If they have access to your personal data, the necessary guarantees will be obtained with them in accordance with the GDPR.

Your personal data will always be processed within the EU.

In rare cases, the Controller may have to disclose your Personal Data pursuant to a court order or to comply with other mandatory laws or regulations. The Controller will make reasonable efforts to inform you in advance in this respect, unless this is subject to legal restrictions.

The personal data will be processed by the Controller for a period that is necessary in relation to the purposes of the processing. Thereafter your data will be erased or made anonymous.

**5. SECURITY MEASURES**

The Controller shall provide appropriate technical and organizational security measures to prevent, in the context of its activities, the destruction, loss, falsification, modification, unauthorized access or accidental notification to third parties of personal data collected, as well as any other unauthorized processing of such data.

The Controller shall ensure that the processors it engages also implement appropriate security measures to minimize the risk of incidents.

In no event can "BREWERY THE MUSKETEERS" be held liable for any direct or indirect damage resulting from the incorrect or illegal use by a third party of your personal data.

**6. RIGHTS OF THE DATA SUBJECTS:**

You have the right at any time, free of charge, to become familiar with your personal data, as well as with the use that "BREWERY THE MUSKETEERS" makes of your personal data.

### **6.1 Right to rectification, erasure and restriction of processing**

You are free to decide whether or not to share your personal data with "BREWERY THE MUSKETEERS". You also have the right at all times to request "BREWERY THE MUSKETEERS" to correct, add to or remove your personal details. You acknowledge that if you refuse to communicate or request the removal of personal data, certain goods or services may not be available.

You may also request that the processing of your personal data be restricted.

### **6.2 Right to objection**

You have a right to object to the processing of your personal data, among other things, for processing based on the legitimate interest.

In addition, you always have the right to oppose the use of personal data for direct marketing purposes; in such case, you do not even have to provide reasons.

### **6.3 Right to data portability**

You have the right to obtain your personal data provided by you to "BREWERY THE MUSKETEERS" in a structured, commonly used and machine-readable form and/or to have it transferred to other responsible parties.

### **6.4 Right to withdrawal of consent**

To the extent that the processing is based on your prior consent, you have the right to withdraw that consent.

### **6.5 Exercise of your rights**

You may exercise your rights by contacting "BREWERY THE MUSKETEERS" to this end, either by e-mail to [info@themusketeers.be](mailto:info@themusketeers.be), by post to the registered office of the company, or by using the "Contact us" contact form on the website, enclosing a copy of the front of your identity card or other document that identifies you. The identification data will not be used for any other purpose and will be deleted immediately after identification.

### **6.6 Automated decision-making and profiling**

The processing of personal data about you does not include profiling, nor will it be subject to automated decisions by "BREWERY THE MUSKETEERS".

### **6.7 Right to lodge a complaint**

You have the right to lodge a complaint with the Belgian Data Protection Authority (GBA), Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be).

This is without prejudice to a remedy before a civil court.

## **7. MODIFICATIONS**

The Controller reserves the right to change this privacy policy at any time by providing notice to users on this page. We encourage you to check this page often for any changes. The date of the last change is indicated at the bottom of the page.

If a user objects to any change in the policy, the user should not continue to use this website. He may request the Controller to delete the personal data. Unless otherwise indicated, the then valid privacy policy applies to all personal data that the Controller has stored about users.