

## **Privacy- & Cookie Policy**

www.trapp.be

### **I. Explanation**

This Privacy Policy is based on article 13 of the EU General Data Protection Regulation 2016/679 (GDPR) and contains the rights and obligations of the undertaking regarding the external parties whose personal data she processes, mainly in the context of online sales and marketing of goods and services.

### **II. Model**

This is the Privacy and Cookie Policy of ABDIJ ONZE-LIEVE-VROUW VAN NAZARETH VZW, trading as TRAPP., Abdijlaan 9, 2960 Brecht (Belgium), BE 0406 678 042 (hereinafter "ENTERPRISE").

Please read this Privacy Policy carefully, because it contains essential information about how your personal data are processed and which cookies are used. By using the website, accessible via the following address (www.trapp.be) hereinafter: "the Website"); by contacting us by mail/phone, by subscribing for our newsletter, you declare that you have read this Privacy Policy and that you expressly agree to its content as well as to the processing itself.

### **Article 1 – General terms**

- 1.1. ENTERPRISE is compliant and further complies with this Privacy Policy to the European Regulation 2016/679 of 27 April 2016 on the protection of personal data. (Hereinafter "GDPR").
- 1.2. The data controller is ENTERPRISE.

### **Article 2 – Collected personal data**

- 2.1. Personal data you communicate to us:
  - **Category 1:** without registration: your IP-adress [and surfing behavior? origin? search terms?];
  - **Category 2:** your profile name, password e-mail address, login and (possibly) your profile picture;
  - **Category 3:** when registering for the newsletter: your e-mail address
  - **Category 4:** data obtained by placing cookies: see art. 9
  - **Category 5:** Address data on the occasion of making an order
- 2.2. ENTERPRISE can obtain your personal data through different means:

- a. by placing cookies;
- b. during your registration and use of the Website;

### **Article 3 – Purposes of the processing of data**

#### 3.1. General purposes:

ENTERPRISE will use the obtained personal data solely for the purposes mentioned below:

- **Category 1:** *the maintaining and improving of the Website and the creation of anonymous statistics based (the identity of particular persons or companies will not be traceable) on the “legitimate interest” of ENTERPRISE to improve the service and Website;*
- **Category 2:** *managing your account on the Website and using the forum based on the execution of the agreement which you requested, in order to send you direct marketing (see 3.2) mailings, if you requested so, based on your explicit consent;*
- **Category 3:** *the sending of direct marketing mailings, newsletters, promotions, based on your explicit and preliminary consent;*
- **Category 4:** *he improving the user-friendliness of the service based on explicit, prior consent (see also art. 9);*
- **Category 5:** *the delivery and invoice-details of the products ordered by you, based on the delivery of a service which you requested.*

You are not obliged to provide us with your personal data, however you must understand that the delivery of certain services is not possible in case you refuse to provide us with certain personal data.

#### 3.2. Direct marketing:

Your personal data will only be used for direct marketing purposes of you give your explicit and preliminary consent (“opt-in”).

In case you have given your consent and you are added to ENTERPRISE’s direct mailing list, ENTERPRISE may use your personal data to send you marketing material as well as other material relating to ENTERPRISE, her products and/or her services. ENTERPRISE can also use the personal data you provided in order to adapt the documents.

ENTERPRISE can also transfer your personal data to her partners, for direct marketing purposes.

This consent can be revoked at all times, for free and without motivation by clicking the unsubscribe button below every promotional e-mail.

### 3.3. Transfer to third parties:

In case of whole or partial reorganization or cession of ENTERPRISE's activities, whereby ENTERPRISE reorganizes, transfers, ceases her business activity or in case ENTERPRISE goes bankrupt, your personal data may be transferred to new entities or third parties.

ENTERPRISE will try, if reasonably possible, to inform you beforehand of the fact that ENTERPRISE transfers your personal data to a third person, but you must be aware of the fact that this is not always possible nor technically nor commercially.

ENTERPRISE won't sell, let, hand out your personal data nor place them at disposal of third parties, except in the situations provided for in this policy or unless your explicit and preliminary consent.

### 3.4. Legal requirements:

In extraordinary circumstances it may occur that ENTERPRISE is obliged to transfer your personal data following a court order or in order to comply with imperative laws and/or regulations. ENTERPRISE will, if reasonably possible, try to inform you on beforehand, unless revealing this information is subject to legal constraints.

## **Article 4 – Duration of the processing**

We will store and process your personal data during the period necessary depending on the purposes of the processing as well as depending on the contractual relationship between you and ENTERPRISE.

## **Article 5 – Your rights**

### 5.1. Access right and right to obtain a copy.

You have the right to freely obtain at any moment access to your personal data, as well as to be informed about the purpose of the processing by ENTERPRISE.

### 5.2. Right to correct, delete and limit:

You have the choice to share your personal data with ENTERPRISE. You also have the right to request ENTERPRISE to correct, delete or complement your personal data. You acknowledge that a refusal to share data or a request to delete these data will make the delivery of certain services and/or products impossible.

You can also request the processing of your personal data to be limited.

### 5.3. Right to object:

You have the right to object to the processing of your personal data when you have serious and 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.

### 5.4. Right to free data transferring:

You have the right to obtain your personal data, which is processed by ENTERPRISE in a structured, usual form, readable by machines, 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. Exercise of rights:

You can exercise your rights by contacting us either through e-mail [info@trapp.be](mailto:info@trapp.be) to or by mail to Abdij Onze-Lieve-Vrouw van Nazareth, TRAPP., Abdijlaan 9, 2960 Brecht, Belgium, with inclusion of your ID.

### 5.7. Automated decisions and profiling:

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

### 5.8. Right to file a complaint:

You have the right to file a complaint with the Belgian Data Protection Authority, 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 does not affect a provision before the civil court.

If you have suffered damages caused by the processing of your personal data you can file a claim for damages.

### **Article 6 – Safety and confidentiality**

- 6.1. We have adopted safety measures which are suited on both a technical and an organizational level to avoid the destruction, the loss, the forgery, the adjustment, the non-authorized access or the notification of the personal data by accident to a third party, as well as the non-authorized processing of these data.
- 6.2. ENTERPRISE shall not be liable in any way for direct or indirect damages caused by a wrongfully or improper use of the personal data by a third party.
- 6.3. At all times you shall comply with safety standards, for instance by avoiding all non-authorized access to your login and access code. You are solely responsible for the use of the Website on your computer, IP-address and identification data, as well as for the confidentiality.

### **Article 7 – Access by third parties**

- 7.1. In order to process your personal data we provide access to your personal data to our employees.
- 7.2. We guarantee a similar level of protection by imposing contractual obligations to our employees that are similar to this Privacy Policy.

### **Article 8 – Cookies**

- 8.1. What is a cookie?

A “cookie” is a small text file that is sent from the server of ENTERPRISE and is stored on your computer’s hard drive. This way we can remember your preferences when visiting our Website. The information stored through these cookies can only be read by ENTERPRISE and only for the duration of your visit to the Website.

- 8.2. Why do we use cookies?

Our website uses Cookies and similar technologies to distinguish your preferences from those of the other users of our Website. This allows us to offer you a better experience when you visit our Website and to optimize our Website in the meantime.

As a result of recent amendments of the law, all websites focusing on certain parts of the European Union are obligated to ask for your permission in order to use or save cookies and similar technologies on your computer or mobile devices. This cookie

policy clearly and completely informs you about the cookies we use and their purpose.

8.3. Kind of cookies:

Cookies can be subdivided based on their offspring, function and durability.

The Website only uses the following cookies:

***Functional cookies***

<b>Name</b>	<b>Domain</b>	<b>Purpose</b>	<b>Validity</b>

***Non-functional cookies***

<b>Name</b>	<b>Domain</b>	<b>Content and Purpose</b>	<b>Validity</b>

For cookies set by third parties (e.g. Google Analytics) we kindly refer you to the statements set forth by these parties on their respective websites (e.g. [Google Analytics cookies](#)). Beware, we do not have any influence on the content of these statements nor on the content of the cookies of these third parties.

#### 8.4. Your permission:

When you first visit our website you will be asked to accept our different kinds of cookies. For each category you can allow or refuse cookies. At any time, you can change the cookie settings for our Website through the hyperlink below our website and thus revoke your permission.

You can block Cookies by activating your browser settings which allows you to refuse the cookies. The rejection of these cookies may have the effect of not allowing you to use some functionalities on the Website.

In case you have any more questions or remarks regarding the processing of personal data, please contact ENTERPRISE per mail [info@trapp.be](mailto:info@trapp.be) or per post at Abdij Onze-Lieve-Vrouw van Nazareth, TRAPP., Abdijlaan 9, 2960 Brecht (Belgium).

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/>

#### *Pop-up Cookie-warning:*

**Cookies**

This Website uses both functional as non-functional cookies. For the placement and reading of non-functional cookies we need your prior consent; this is not the case for functional cookies. You can alter the use of cookies later by changing your preferences. You can find more info in our Cookie policy.

<I agree> <I don't agree> <More information>