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1. Definitions

Personal data	all information about an identified or identifiable natural person. An identifiable person shall be regarded as identifiable, directly or indirectly, in particular by means of an identifier such as a name, identification number, location data, an online identifier or one or more elements characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person ;
VACA	VACA cvba-vso, with registered office at 8400 Oostende, Zeedijk 330, registered at the Crossroads Bank for Enterprises under number BE 0461.255.289, RPR Gent, Department Oostende; Tel: +32 (0)78 156 100 E-mail: info@vayamundo.eu
Processing	an operation or a set of operations relating to personal data or a set of personal data, whether or not performed via automated processes, such as collecting, recording, organizing, structuring, storing, updating or modifying, retrieving, consulting, using, providing by means of forwarding, distributing or otherwise making available, aligning or combining, blocking, erasing or destroying data;

2. Object

This Privacy Policy contains the terms and conditions that apply to the processing of personal data that you provide to VACA.

3. Which personal data does VACA keep up with?

The following personal data are kept:

- Identification data (name, address, telephone number, ...);
- Financial data;
- Personal characteristics (age, gender, marital status, ...);
- Physical data (size, weight, ...);
- Composition of the family;
- Training and education;
- Profession and employment;
- Image recordings (camera surveillance);
- National register number / social security identification number.
- Membership of a trade union, trade union or similar group (with the explicit consent of the person concerned)

4. For what purposes are your personal data used?

Your personal data are kept for the following purposes:

- Execution or conclusion of (an) agreement(s);
- Direct marketing;
- Relationship management (customers (CRM) and / or suppliers);
- HR;
- Website and / or application (s);
- E-commerce

5. What does VACA do with your personal data?

VACA takes the protection of your privacy and personal data seriously.

It has therefore already undertaken all the initiatives it deems necessary to comply with the current privacy legislation, in particular the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data "(hereinafter referred to as the" Privacy Act ")", its implementing

decrees, the amendments thereto and as recently updated and still to be amended in accordance with the General Data Protection Regulation¹ (hereafter “GDPR”).

VACA undertakes to follow this legal framework and, where necessary, to take additional measures and implement adjustments following its updating.

The personal data requested by VACA are therefore always limited to those data that we consider necessary and sufficient for the proper performance of our services.

We strive to ensure that the personal data processed by us are correct and updated in the event of a modification.

Your data will always be kept for a specific period, depending on our service and / or the legal requirements that VACA has to fulfil.

Finally, we guarantee adequate protection (including through encryption) against unauthorized or unlawful processing and against accidental loss, destruction or damage to your personal data, depending on the state of the art and the sensitivity of the relevant data.

6. Lawfulness of processing (Opt-In)

6.1. VACA will only process your personal data if (i) you give your permission for one or more specific purposes mentioned above, (ii) when the processing of your personal data is necessary for the performance of the services to which you request VACA (processing in the execution of an agreement), or (iii) when VACA can invoke a legitimate interest to do so, provided that your interests or fundamental rights and fundamental freedoms do not weigh more heavily.

For purposes of direct marketing, VACA will always request your explicit consent for the use of your personal data. Notwithstanding your consent, you have the right to object to the processing of your personal data for direct marketing at any time.

6.2. If you have changed your mind after your opt-in, you can withdraw your consent to the further processing of your personal data at any time by contacting us via privacy@vayamundo.eu or by sending your request to the following address:

VACA cvba-vso
Zeedijk 330
8400 Oostende

7. Your rights

7.1. General

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (general data protection regulation)

VACA strives for transparency regarding the processing of your personal data. When VACA processes your personal data, you can request us to be informed about this in a concise and clear manner.

If applicable, you have the right to request VACA to inspect, rectify or delete your personal data, or to limit your processing. You may also object to the processing of your personal data and you have a right to data portability.

7.2. Right of inspection

When we process personal data of you, you have the right to inspect the data and you can also request the following information:

- the processing purposes;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be provided, in particular recipients in third countries or international organizations;
- if possible, the period during which the personal data are expected to be stored, or if this is not possible, the criteria for determining this period;
- when we do not obtain your personal data directly from you, the available information about the source of your personal data;

If you request more than one copy, we reserve the right to charge an administrative fee for this.

7.3. Right to improvement

If you determine that the personal data processed by us are incorrect or incomplete, you can request us to make the necessary improvements or additions.

7.4. Right to oblivion

You have the right to require VACA to delete the personal data we process from you, but only in one of the following cases:

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed by VACA;
- You withdraw your consent to the processing of your personal data and no other legal basis is available on which VACA can process your personal data;
- Because of a specific situation relating to you, you object to the processing of your personal data, except when VACA invokes compelling justified grounds for processing that outweigh your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim;
- Your personal data have been processed unlawfully;
- Your personal data must be deleted in order to comply with a legal obligation that applies to VACA.

7.5. Right to restriction of processing

In certain cases, you may request VACA to limit the processing of your personal data, in particular:

- If you dispute the accuracy of your personal data during a period that enables VACA to verify the accuracy of your personal data;
- The processing would be unlawful but you do not want your personal data to be deleted;
- VACA no longer needs your personal data for the processing purposes, but you need them yourself for the institution, exercise or substantiation of a legal claim;
- Because of a specific situation related to you, you object to the processing of your personal data, pending the answer to the question whether the justified grounds of VACA outweigh your interests, rights and freedoms or that are related to the institution, exercising or substantiating a legal claim.

A restriction on your personal data will result in VACA marking them with the aim of limiting their processing in the future.

7.6. Right to transfer your personal data

In certain cases you have the right to obtain the personal data you have provided to VACA in a structured, standard and machine-readable form, and you have the right to transfer this information to another controller. These are the following cases:

1. The processing of the personal data is based on your permission or the processing is necessary for the execution of the agreement;

AND

2. The processing is carried out via automated processes.

Both aforementioned conditions must be fulfilled. If this is not the case, then you are not entitled to transferability.

After all, the right to transferability must not affect the rights and freedoms of others (e.g. if the data concerns more than one data subject). VACA reserves the right to refuse portability if it believes that this would affect the rights and freedoms of others.

8. Security of your personal data

8.1. Considering the state of the art, the implementation costs, as well as the nature, size, context, processing purposes and the various risks and risks of your rights and freedoms in terms of probability and severity, VACA ensures that it has taken the necessary security measures - and update from time to time - to ensure a level of security appropriate to the risk.

Where relevant, the measures taken by VACA may relate, inter alia, to:

- the pseudonymisation and encryption of your personal data;
- the ability to guarantee on a permanent basis the confidentiality, integrity and availability of its processing systems and services;

- the possibility to repair the availability of and access to the personal data in a timely manner in the event of an incident;
- setting up a procedure to test, assess and evaluate the effectiveness of the technical and organizational measures to secure the processing at regular intervals.

Where VACA itself is responsible for the storage of your personal data, this is done on secured servers.

8.2. VACA warrants that it has also taken appropriate measures to ensure that any natural person acting under its authority or under the authority of the processor and in the exercise of his / her function or assignment for VACA or the processor, gains access to your personal data, only processed on behalf of VACA, unless he / she would have been obliged to do so on the basis of a legal provision.

9. Reporting of infringements

9.1. VACA is legally obliged to report an infringement relating to your personal data to the supervisory authority without unreasonable delay and, if possible, not later than 72 hours after having taken note of it.

For Belgium, this supervisory authority is the Commission for the Protection of Privacy (hereinafter referred to as "the Privacy Commission"), with its registered office at 1000 Brussels, Hoogstraat 139 (Tel: +32 (0) 2 / 213.85.40; Fax: +32 (0) 2 / 213.85.65; e-mail: commission@privacycommission.be). The Privacy Commission is an independent body that supervises the protection of privacy in the processing of personal data.

9.2. If applicable, and if the breach is likely to pose a high risk to your rights and freedoms, VACA commits itself also to report the breach of your personal data to you, unless one of the following conditions is fulfilled :

- VACA has taken appropriate technical and organizational protection measures that make your personal data incomprehensible to unauthorized persons (encryption, pseudonymisation, etc.) and these measures have been applied to your personal data to which the infringement relates;
- VACA has taken the necessary measures after detection of the infringement to ensure that the infringement is no longer a high risk for your rights and freedoms;
- the communication would require disproportionate efforts. In that case, VACA will instead make a public announcement or take a similar measure on the basis of which you are equally informed.

10. Processing by third parties

10.1. It is possible that VACA depends on the services of third parties for the proper performance of its services. In this respect, VACA guarantees that it has entered into an agreement for the processing of personal data with its direct subcontractors (hereinafter referred to as the "Processors' Agreement"), at least obtained from this third party the written guarantee that these will always act in accordance with the current privacy legislation, in the particularly the Privacy Act and the GDPR.

By means of a Processor Agreement, these third parties undertake to act in full compliance with the current privacy legislation, in particular the Privacy Act and the GDPR, upon processing your personal data in the context of a contract outsourced to them by VACA.

10.2. It may happen that VACA calls on certain external service providers that have their own privacy policy with regard to the information we have to provide them for your purchase-related transactions, such as payment gateways and other payment transactions.

If necessary, we advise you to read the privacy policy of these service providers, so that you understand how your personal data are handled by these providers.

Keep in mind that certain providers may be located in a different jurisdiction than Belgium or the European Union or have facilities there. If you choose to continue with a transaction involving the services of an external service provider, your information may be subject to the laws of the jurisdiction (s) in which that service provider or its facilities are located.

For example, if you are in Canada and your transaction is being processed by a payment gateway in the United States, your personal information used in completing that transaction may be made public under US law, including the Patriot Act.

11. Amendment

VACA reserves the right to change this Privacy Policy without prior individual notice. Please therefore regularly review this policy.

12. Complaints and comments

12.1. If you have a complaint or comment about this Privacy Policy or the processing of your personal data, or if you find an infringement on the processing of your personal data, please contact VACA in the first instance.

This can be done by sending an e-mail to privacy@vayamundo.eu or by transferring your complaint to the following address:

VACA cvba-vso
Zeedijk 330
8400 Oostende

VACA undertakes to deal with your complaint as soon as possible, but judges sovereignly over its merits.

12.2. If you wish, you can also address your complaint to the Privacy Commission (Tel: +32(0)2/213.85.40; Fax: +32(0)2/213.85.65; E-mail: commission@privacycommission.be).

13. Applicable law and competent court

13.1. Applicable law

This Privacy Policy is subject to Belgian law.

13.2. Competent court

The courts of the judicial district of Ghent, Ghent department are authorized to take cognizance of any dispute between VACA and the person concerned whose personal data are processed by or on behalf of VACA.

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