

POLICY ON PRIVACY AND PERSONAL DATA PROTECTION

We attach great importance to respecting your private life, which is why we wish to give you clear information on the way your personal data are collected and used. The aim of this privacy statement is to clearly explain the types of personal data we use and how we process them.

Our legal reference is EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Regulations on Data Protection) <http://eur-lex.europa.eu/eli/reg/2016/679/oj>.

This document will probably be modified regularly, so we recommend that you consult it regularly to give your consent to the procedure in force on the day you visit the website.

CONTACT DETAILS

- Name : FLASH-BACK
- Address : Chemin de la Platte - 50/A - Belgium
- Tel : +32 (0)87 34 07 17
- Company name/ID : BE 0756 250 206
- Person in charge : Mr Gérard SCREVE
- Person responsible for data processing : Mr Gérard SCREVE

TYPES OF DATA PROCESSED

Processing and use of your personal data

By personal data, we understand not only the data that identify you directly, but also those that do so indirectly.

Direct identification is possible with the help of personal data such as name, address, national identity card/passport number, email, telephone number, etc.

Indirect identification is possible with the help of data that can identify you if they are combined with other sources of information. Your credit card number, for example, is not personal data as such. Nevertheless, it becomes personal data once it is associated with your name.

The processing and use of personal data refers to everything we do: the collection, registration, storage, use, consultation, modification, dissemination, sharing or destruction of your personal data.

What kinds of personal data do we process?

The different categories of personal data that we usually treat are the following:

Personal data such as:

✓ = yes

✗ = no

- your civil status (Mr/Ms)
- your Christian name,
- your surname
- your address
- your email address
- your telephone number
- your message
- the data communicated by your web browser (location, arrival page, time of visit, conversion rate, domain name, system name, IP address...)

Sensitive personal data

- finances
- health
- religion
- race
- sexual orientation
- political convictions

For a classic e-commerce website :

- your credit card number
- your confirmation code
- your invoices
- your inscriptions in events
- your purchase choices

Who is affected by our processing of personal data?

- People who surf our website
- People who fill in a form to ask us questions or ask for information
- People who present a candidature
- People who buy our products online

We always request your consent on the use of your personal data when you first contact our website. This consent is then stored in our servers.

DATA COLLECTION

Every time you visit our website, our server automatically recognises your IP address. It does not automatically detect your email address. We keep the following information on your visit to our website:

- your IP address;
 - your email address if, e.g., you have sent it to us by sending messages or questions to the website, by communicating with us by email, by signing up for one of our events online, by accessing the restricted area of the website by using a password, etc;
 - all the information regarding the pages you have consulted on our website;
 - any information that you have given voluntarily, for example, in information surveys, registration on the website, or by accessing the restricted section through a password. This can refer to your surname, first name, address and demographic data (e.g. age or sex).
 - via the cookies on our website
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CONSENT

We regularly inform users of our website about the collection of personal data and the use that can be made of them, at the time we receive these data from the user.

Consent is requested the first time the user enters the website for the processing of his/her data. This consent is stored by us.

COOKIES

Cookies are data files that a website sends to your computer during your visit to our website. These files contain information that allows our website to memorise important data that will make your use of our website more efficient and more useful. We use cookies to determine what draws visitors' attention, provide a better service and to offer you personalised content. You can disable cookies, either by not accepting them when you log on to our website (alert message) or by configuring your computer so that it does not save cookies on your hard drive. If you reject cookies you will not have access to all the functions on our website. We use cookies (e.g. Google Analytics) to improve your computer's performance, allow it to remember your preferences (language, currency, memorisation of your access codes...) and to give you information that we think may be of interest or use to you. These data do not allow the identification of natural persons (your anonymity is maintained).

USE OF THE PERSONAL DATA COLLECTED

The processing of personal data related to this website is governed by Belgian law. The new European regulation on data protection was finally adopted by the European Parliament on 14 April 2016. Its provisions have been directly applicable throughout the 28 Member States of the European Union from 25 May 2018. This privacy policy is applicable to all the pages hosted and for all recordings on this website.

Security of the collected data

As required by law, we have implemented adequate security measures to protect against the loss, unlawful use or alteration of data received on our website. We take all the necessary measures to ensure that these data are treated in a secure manner. Nevertheless, no transmission of data on the Internet can be guaranteed 100% safe. Therefore, we cannot guarantee the 100% security of the data sent to us.

Security measures in place:

- Creating awareness among users
- Authentication of users
- Tracing of access addresses
- Securitisation of machines that have access to personal data
- Securitisation of access to machines
- Protection of the database
- Regular updating of software, the system and plug-ins
- Regular back-ups
- Captcha on all forms
- ...

This list is not exhaustive because the evolution of security systems means that we have to constantly improve these measures. If, however, a security failure is observed ('zero risk' does not exist), we will urgently apply a corrective measure that will then be incorporated into our security policy.

Although we do our best to make your data secure, we recommend that you put the following measures in place to safeguard your data on your side: install anti-virus and anti-spyware software and a firewall. Set your preferences so that these forms of protection can be regularly updated.

Ensure that your passwords are kept confidential and use complex ones (combination of lower and upper case + figures + symbols). In other words, avoid obvious combinations of letters and figures. Change your passwords regularly.

Use of data

We use your personal data for the following purposes:

- to promote our products (special offers, promotions, catalogue, etc.) - you can decide to stop this at any time.
- to securitise our website by tracking any false identities that could be an attempt to hack your account
- to contact you by telephone (or in the event of problems with email)
- to deliver our products to you
- to carry out the services we propose
- to administer our activity: transmission of cost estimates, contracts, invoices...
- to consult you to get your opinion
- to give you securitised access (password/secret code) to our website or part of it
- to improve our website (statistics) and our strategy
- to personalise the content and adverts
- to suggest useful products to you

PRIVACY STATEMENT

We take the security of your data very seriously. To this end, we observe government regulations and continuously update our security systems. More specifically, we have taken steps and created procedures to guarantee the integrity of your personal data and their confidential and securitised processing.

Your data will be analysed and processed by us under conditions of total confidentiality.

Your data will not be assigned, sold or transferred with the exception of our partner subcontractors (accountancy service, server host...), to which we will only transfer the data needed for the correct performance of our work.

We reserve the right to observe the laws, regulations or any other legal requirement to protect the integrity of the website, to respond to your requests and to cooperate in any legal proceedings to use or reveal any data, but only if this is considered necessary.

PROCESSING

Automated processing of personal data

No automated processing of your data is done by us.

Consultation

We make every effort to be as transparent as possible regarding the data we use. You can access all the data collected by us that refer to you, free of charge and at any time following a written request and after a verification of your identity

Modification

You may rectify or modify the data collected by us that refer to you, free of charge and at any time following a written request and after a verification of your identity.

Restriction

A restriction on the use of data may be applied when:

- their accuracy is challenged by the person concerned (restriction during the verification period)
- their processing is illegal and the person concerned opposes their deletion
- the data are needed by the person concerned in order to ascertain, exercise or defend rights in the law courts, even if the person responsible for their processing no longer needs these personal data

The lifting of any restriction must be notified to the concerned person. The concerned person may refuse this lifting if the corrective action applied is incomplete or inaccurate.

Deletion (the right to be forgotten)

You may definitively delete the data referring to you (the right to be forgotten), free of charge and at any time following a written request and after a verification of your identity. This may take a few days, depending on the number of requests received and the data to be processed.

Portability

You may - free of charge and at any time following a written request and after a verification of your identity - recover (in a currently used format that is legible to current machines) the personal data that you have provided, and freely transmit them without our person responsible for processing data to whom they have been communicated may standing in the way (for example, a song list of a streaming service to transfer it to a competitor). These data must be returned to you in a format that allows their re-use.

CONSERVATION OF YOUR DATA

We will make every effort to only conserve your personal data for the purpose for which they were collected, with a maximum of one year.

Restriction

- if a court case is brought by you against us, it is possible that the deletion or modification of your data may not be granted to you until the final verdict.
- the processing of your data is free of charge unless claims by a person are without grounds or excessive (e.g. too repetitive).

Transfer to third parties

If your data need to be transferred to third parties (subcontractors, host, etc.) for the correct performance of our work (administrative services, e.g. accountancy service to prepare invoices, VAT declarations) we ensure that:

- this is in accordance with the GDPR
- we only communicate the minimum data required to them
- we communicate these data to them securitised

For e-commerce website the subcontractors are

- Woo-commerce
- SWIFT: for the exchange of messages within the framework of securitised financial transactions
- MasterCard: for credit card payments and transactions worldwide
- Atos Worldline: for credit transactions worldwide
- delivery services for our products (postal services, courier companies)

RESPONSE MODE

We ensure that any modifications or requests related to personal data are dealt with as soon as possible. The maximum period is 1 month starting from the reception of the request. This may be extended as required to 2 months (with information and justification of this extension being given within the first month).

CLAIMS

Any natural person who justifies his/her identity may request, as the case may be, that his/her personal data may be rectified, completed, updated, blocked or deleted, or if they are inaccurate, incomplete, wrong, out of date, or whose collection, use, communication or conservation is forbidden.

We undertake to deal with any claim related to the protection of your private life quickly, and apply procedures that allow us to respond efficiently to any problem that you may encounter.

You may make this request (only in writing) via our website **www.flash-back.eu** or by ordinary mail to **Flash-Back c/o Gerard Screve - Chemin de la Platte 50/A - 4845 Jalhay - Belgium.**

This privacy statement, dated 25/05/2018, may be subject to modifications with the aim of guaranteeing that its content accurately reflects developments in the regulatory area, as well as any change within our company.

INTELLECTUAL PROPERTY

The content (texts and images) on this internet website and this statement are the property of Flash-back. It may not be copied or completely or partially transferred without written consent from us.