

# Privacy policy

## Identification of the data controller

Modern information and communication technology plays a fundamental role in the activities of an organisation such as JPCR SA. Our key activities include conducting qualitative market studies on behalf of our clients.

JPCR SA undertakes to scrupulously respect the Belgian data protection legislation. The full text of this legislation has been published on the website of the Data Protection Authority: <https://www.dataprotectionauthority.be/>

The present privacy policy is applicable to JPCR SA as the data controller of the Site <https://www.jpcr.be> (hereinafter referred to as the Site).

### **JPCR SA**

Address : Clos de la Futaie 5 B-1410 Waterloo - Belgium

E-mail address : [info@jpcr.be](mailto:info@jpcr.be)

Contact person : *Jean-Paul Crabbé*

Data Protection Officer : *Jacques Folon who can be contacted at [jacques@gdprfolder.eu](mailto:jacques@gdprfolder.eu).*

## Anonymous access authorisation and acceptance of our privacy policy

You are free to access our home page and to consult our Site without providing us with your personal data.

# Register of processing operations

JPCR SA keeps a record of all the processing operations performed under its responsibility. This documentation shall as a minimum contain the following information:

- the name and details of the data controller, or of any joint data controller or of any processor, and of the representative, as the case may be;
- the name and contact details of the data protection officer or his deputy;
- the purposes of the processing,
- a description of the categories of persons concerned and of the categories of personal data relating to the persons in question;
- the recipients or the categories of recipients of personal data, including the data controllers whom the personal data are disclosed to for the legitimate purpose pursued;
- as the case may be, the transfer of data to third countries or an international organisation, including the name of the third country or international organisation in question and, as appropriate, the documents showing that the appropriate safeguards are in place;
- a general indication of the time frames within which the various categories of data shall be erased;

## Automatic data collection

The following data are collected each time you visit the Site:

- IP address
- DNS address
- Web browser
- Screen resolution
- The page via which the Site was accessed

JPCR SA only collects these data to compile statistics on the usage of the Site and does not link them to personal data collected elsewhere.

# Cookies

When you visit our Site a “cookie” (a small file sent by the Internet server, which is stored on your computer’s hard disk, keeps track of your visit, contains certain information on your visit and is accessible by this Site only) may be stored on your hard disk.

You may program your Web browser to either inform you of the existence of cookies or to refuse them systematically. This cookie makes it easier for you to browse our Site and does not link up any information cookies store automatically to nominative information about our visitors.

JPCR SA informs users on their use in accordance with the prevailing legislation.

## Data collected and specification of purposes

JPCR SA only collects personal data you provide of your own accord and in accordance with the present privacy policy.

The only data we collect when you subscribe to our Site are those that are required to process the data relevant to the purpose for which you supplied them.

The purposes for which we collect your data are:

- Managing the file of persons who contact us

On no account shall any of your personal data be used for direct marketing purposes. We hereby undertake to contact you and ask you for your consent any time we wish to use your personal data for a new purpose.

The present privacy policy shall not in any way restrict the rights JPCR SA is bound by vis-à-vis natural persons, whether contractually or by law.

## Disclosure of data to third parties

We do not disclose your personal data to third parties. We merely reserve the right to transmit personal data at the request of a judicial or administrative authority or on foot of the law.

## Length of data retention

In the absence of any legal obligations, participants' personal data shall be retained for a period of 12 months after they last contact with us.

## Confidentiality and security

The Site is subject to a security policy, to security rules and measures designed to protect personal data.

Having regard to the state of the art and the cost of their implementation, JPCR SA applies, when defining the processing methods and during the actual processing itself, the appropriate technical and organisational measures and procedures to ensure that processing is consistent with the legal requirements and that data subjects' rights are safeguarded.

JPCR SA has put mechanisms in place to ensure that, by default, only personal data that are required for each specific processing purpose are processed and, in particular, that their collection or retention does not go beyond what is necessary for

these purposes, whether in terms of data quantity or the period of time they are stored. In particular, these mechanisms guarantee, by default, that personal data are not made accessible to an indefinite number of natural persons.

Having regard to the state of the art and the cost of their implementation, JPCR SA and its data processors have implemented the appropriate organisational and technical measures to ensure a level of security commensurate with the risks represented by the processing and the nature of the personal data to be protected.

On the basis of a risk assessment, JPCR SA and its data processor take the measures prescribed by law to protect personal data against accidental or unlawful destruction and accidental loss and to prevent any form of unlawful processing, including the unauthorised disclosure, distribution or access and the alteration of personal data.

JPCR SA shall

- make every effort to ensure that the data are up to date, to correct or delete any data that are incorrect, incomplete or irrelevant;
- see to it that access to and the opportunities to process data are limited to what any persons acting under its authority need to carry out their duties or to the requirements of the service;
- inform any persons acting under its authority of the provisions of Belgian law and its implementing decrees, and of any relevant provisions on privacy and the processing of personal data;
- ensure that the software used for the automatic processing of personal data is in conformity with the terms of the declaration submitted to the Privacy Commission and is applied lawfully;
- ensure that any persons acting under the authority of the data controller or a data processor, and the data processor personally, who have access to personal data, can only process data on the instructions of the data controller, unless compelled to do so by virtue of a law.
- take, and compel its data processors and partners to take the relevant technical and organisational measures to protect the personal data against accidental or unauthorised destruction, against accidental loss, and against any unauthorised modification, access or any other form of unauthorised processing of personal data. These measures shall offer an adequate level of protection, taking into account, on the one hand, the current state of technology in the field and the cost involved in implementing these measures and, on the other hand, the nature of the data to be protected and the potential risks.

Where the processing of data is entrusted to a data processor, JPCR SA shall:

- choose a data processor that provides the necessary guarantees in terms of the processing-related technical and organisational security measures;
- ensure that these measures are adhered to, inter alia on the basis of specific contractual provisions;
- contractually define the data processor's responsibility vis-à-vis the data controller;
- agree with the data processor that the latter shall act on the instructions of the data controller only and is bound by the exact same legal obligations as the data controller;
- set out the data-protection elements of the contract and the relevant security requirements in writing or on an electronic medium;

## Your rights as user

In accordance with the prevailing legislation, you can, by letter addressed to the contact person listed above, with a recto verso copy of your identity card to prove your identity enclosed, exercise your right

- of access,
- of rectification,
- to erasure,
- to restriction of processing,
- to object to profiling,
- data portability.

Any newsletters, emails, mailings and letters you may receive will invariably state that you are free to unsubscribe from any future communications and to amend your personal details if necessary.

## Privacy point of contact

In the event of questions or a problem with our privacy policy, please contact our DPO or contact person whose details have been listed above.

If you are not satisfied with our response to your concern you may contact the Data Protection Authority: <https://www.dataprotectionauthority.be>.