# Autodistribution International (ADI) Privacy Policy

# Terms used in the policy

Local law: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF 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, and repealing Directive 95/46/EC (General Data Protection Regulation). If the applicable local law in individual cases has more stringent requirements in terms of data protection and privacy than this Privacy Policy, personal data shall be treated in accordance with these stricter laws.

"We", "us" and "our": (and other similar terms) refer to the head office of ADI based in Kortenberg, Belgium. ADI will be the "Data controller" as prescribed in the entity's local law.

**ADI Partner**: a national organisation or company that is a member of AD International, present in one or more countries. An updated list of ADI Partners can be found at <a href="www.ad-europe.com">www.ad-europe.com</a>. **ADI Service Providers**: External bookkeeper, Website providers, IT maintenance and telecom providers, Mailing providers or handlers.

**Personal Data:** is any information relating to an identified or identifiable natural person.

**Identifiable natural person:** is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors.

"You" and "your" (and other similar terms) refer to our Partners, their members or customers of their members (mostly automotive repair shops), ADI contract suppliers, ADI service suppliers, or professional contacts in general.

## Your rights in relation to Personal Data and how to exercise them

Under the local law you have several rights, including::

- the right to ask us to provide you, or a third party, with copies of the Personal Data we hold
  about you at any time and to be informed of the contents and origin, verify its accuracy, or
  else request that such information be supplemented, updated or rectified according to the
  provisions of local law;
- the right to request erasure, anonymisation or blocking of your Personal Data that is processed in breach of the local law;
- the right to object on legitimate grounds to the processing of your Personal Data. In certain circumstances we may not be able to stop using your Personal Data, if that is the case, we'll let you know why;
- the right to lodge a complaint with the Privacy Protection Commission
   commission@privacycommission.be
   . If you do lodge a complaint, we kindly request you to inform our Data Controller (mydataprivacy@adi.be). We will make every effort to resolve the issue with you.
- the right to withdraw your consent when Personal Data is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Data where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer want to receive any marketing and communication material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact the relevant Data Controller at mydataprivacy@adi.be.

To exercise such rights and if you have any questions about how we collect, store and use Personal Data, please contact us using the details as set out in the "Data Controller contact information" section below.

## What Personal Data do we collect and process?

ADI processes your data for various purposes. Its objectives and legal grounds are the following:

### 1. Service provision

ADI processes your personal data on the basis of contractual necessity for the duration of the contract and retains this information for a period of 5 years after the contract ends.

We may need to share your Personal Data with our business partners (including professional advisers such as accountants or auditors), external service providers, for instance web hosters.

## 2. Administration and legal obligations

In order to comply with legal, administrative and fiscal obligations.

ADI will store your personal data on the basis of a legal obligation, over a period of 7 years after the services between ADI and the client have been terminated.

#### 3. Recruitment

As part of the recruitment process, ADI stores CVs.

ADI processes personal data on the basis of the consent of the person concerned. ADI retains this information for a period of 2 years.

If the person is recruited, his or her data are transferred to Human Resources and are stored on the basis of contractual necessity. ADI then retains the data throughout the duration of the employment contract. At the end of the employment contract, the data are retained for a period of 1 year, except for accounting and fiscal data that are subject to administrative obligations.

## 4. Marketing

To provide information about ADI, events and other related topics, ADI distributes news bulletins.

Thus, ADI processes personal data on the basis of the consent of the person concerned. ADI retains this information for a period of 3 years.

#### 5. Photo - video

If photos or video footage are made during an ADI event, participants will be notified in advance. They can object to the storage, use and publication of their image through a dedicated form, to be collected by the event organizer (ADI staff).

The photos and video footage taken during this event will be used for ADI communication purposes, for example in the ADI Newsletters, on social media such as Facebook and LinkedIn and on the ADI website.

ADI takes all precautions necessary and as required by law to preserve Your personal image data.

## Who else may have access to your Personal Data?

ADI Service Providers have access to your information in order to fulfil the contractual services that are provided by ADI and ADI Partners.

We will only share your Personal Data with third parties when we are legally permitted to do so.

This might be necessary, for example, to pass your Personal Data to third parties such as:

- credit-checking agencies for credit control reasons;
- third parties in connection with management of an event, in which case the details will only be used by the third party for that specific purpose;
- business partners, service providers and other affiliated third parties: to enable us to provide
  our services to you, we may need to share your Personal Data with our business partners
  (including professional advisers such as accountants or auditors), external service providers
  such as for instance web hosters.
- disclosures required by law or regulation: in certain circumstances, please note that we may
  be required to disclose Personal Data under applicable law or regulation, including to law
  enforcement agencies or in connection with proposed or actual legal proceedings.

## How do we look after your Personal Data?

We have in place appropriate technical and organisational security measures to protect your Personal Data against unauthorised or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third-party service providers.

Our third parties and ADI Service Providers are held to the same technical and organisational security measures to protect your Personal Data as ADI.

## Links to other websites

The ADI websites (<a href="www.ad-europe.com">www.ad-europe.com</a>, www.eurecar.org) may link to other, unaffiliated third-party websites or suppliers' websites. Please note that we are not, and cannot, control or be responsible for the content or privacy and confidentiality practices of any third-party websites. You must always carefully review the privacy and confidentiality policy of any third party website that you may visit in order to understand how the operators of that website may collect, store and use your Personal Data.

# **Updates to this Policy**

This Policy was last updated in December 2019. Please check back regularly to keep informed of updates to this Policy.

## **Data Controller contact information**

ADI cvba (Autodistribution International)

Leuvensesteenweg 272

3070 Kortenberg

Belgium

T. +32 2 759 29 95

General contact address for privacy matters: <a href="mydataprivacy@adi.be">mydataprivacy@adi.be</a>

#### **Direct contacts:**

Manuel Van Royen (Marketing Director): mvr@adi.be

Johan Dupont (Business Intelligence Manager): <a href="mailto:johan.dupont@adi.be">johan.dupont@adi.be</a>