

www.ethel.eu

This is our privacy policy. This is our GDPR-framework. We care for your data. When you read that sentence, it's probably not true. But we do. Because we love privacy. Because privacy is more than law. It is a fundamental base of our existence. This is our policy.

Your privacy & Ethel

Privacy Policy

Legally designed by

ethel

Updated:

May 2019



we create,
curate,
and design
the legal
industry.

Intro

The website www.ethel.eu
(hereafter: the "Website") is managed by:

Ethel BV (hereafter: "Ethel", "We" and "Us")
Heernislaan, 19
9000, Ghent
Belgium

Company number (VAT-BE) BE 0726.745.675

Email: contact@ethel.eu
Phone: 0032 9 320 00 34

Feel free to contact us should you have any
privacy-related questions.

We only use and process your personal data in accordance with the GDPR and any replacement legislation, or any similar regulation under any applicable law, and any regulatory requirements or codes of practice governing the use, storage or transmission of personal data.

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Every person who visits or uses the Website (hereafter: the “Visitor”) as well as every person who relies on our services (hereafter: the “Customer”) will in most cases disclose a certain amount of personal data. The personal data is information which allows Ethel to identify you as a natural person, regardless of whether we actually do this. You are identifiable as soon as it is possible to create a direct or indirect link between one or more data and you as a natural person. The Visitor and the Customer are hereinafter also jointly referred to as the “Data Subject”.

We only use and process your personal data in accordance with the GDPR and any replacement legislation, or any similar regulation under any applicable law, and any regulatory requirements or codes of practice governing the use, storage or transmission of personal data. Every reference in this Privacy Policy to the ‘GDPR’ is a reference to the Regulation 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 (General Data Protection Regulation).

**We only
use your
personal
data in
accordance
with the
GDPR**



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Through this Policy, every User of is informed of the processing activities Ethel may carry out with his or her personal data. Ethel reserves the right to modify this Privacy Policy at all times.

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Who is responsible for the processing of personal data?

Who is the controller? The processor?

2.1. Controller

Ethel is responsible for the processing and decides alone or in cooperation with others which personal data is being collected as well as the purposes and the technical and organisational means with regard to the processing of this personal data.

Ethel has taken appropriate technical and organizational measures to protect the personal data of its Visitors and Customers. Ethel uses various adequate security technologies and procedures to protect your personal data against unauthorized access, use or disclosure. Ethel ensures that your personal data is stored safely in a controlled environment.

2.2. Processor(s)

Ethel is free to rely on data processors. A processor is the natural or legal person who processes your personal data upon request and on behalf of the data controller. The processor is required to ensure the security and confidentiality of the data. The processor shall always act on the instructions of the data controller.

Ethel relies on the following categories of "processors":

- Companies we have enabled for communication purposes (e.g. live chat on the website);
- Companies we have engaged for logistic purposes (e.g. order picking, delivery, etc.);
- Companies we have engaged for analytical purposes;
- Companies we have engaged for payment purposes.

With a view to the optimal protection of the personal data of our customers, we have made the necessary contractual arrangements with the aforementioned data processors to ensure that they apply the highest privacy standards. In any event, data processors shall be required to ensure the security and confidentiality of the personal data.

As a resident of the European Economic Area, a transfer of your personal data outside the European Economic Area (EEA) can only take place to countries that the Data Protection Authority in Belgium has found to provide the same adequate level of protection or, if this is not the case, to the extent that Ethel has made the necessary contractual arrangements, taking into account the standard provisions as imposed by the Data Protection Authority in Belgium, to ensure that your personal information receives an adequate level of protection.

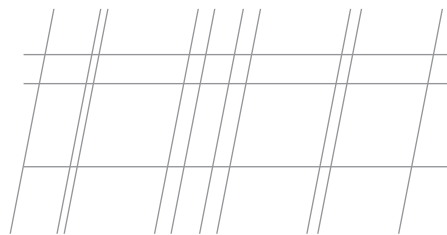
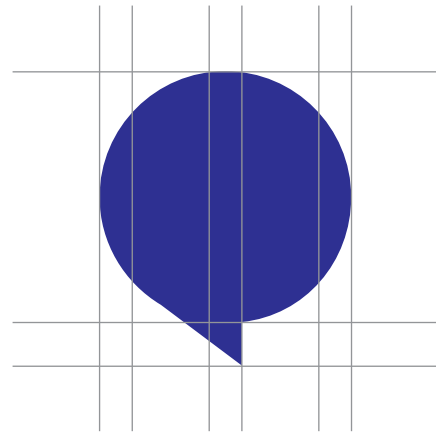
- Companies we have engaged for marketing purposes;
- Companies we have engaged for ICT technical support and hosting purposes;
- Companies we have engaged for administrative purposes (e.g. CRM system);



On what legal grounds is your data processed?

In accordance with the GDPR we process personal data on the following legal grounds:

- On the basis of the execution of the contract agreed upon with the Customer or the execution of pre-contractual steps taken at the request of the Data Subject; or
- On the basis of compliance with legal or regulatory provisions with regard to the management of the contractual relationship with the Customer, invoicing in particular;
- On the basis of our legitimate interest in responding to information requests from Visitors and Customers;
- On the basis of our legitimate interest in sending promotional offers (direct marketing) to our Customers;
- On the basis of the explicit consent to send promotional offers (direct marketing) to Visitors.



What personal data is processed?

Ethel commits to only collect and process your personal data in a way that is adequate, relevant and limited to what is necessary for the purposes for which they are processed.

How much and what personal information Ethel collects about you depends on your use of the Website and/or of our services. The collection of personal data will be further expanded as more intensive use is made of our Website and our services. In general, Customers will provide more personal data than Visitors. The following categories of personal data are processed by Ethel:

Customers:

- Personal identification data (name, first name, address, login details);
- Contact details (telephone number and e-mail address);
- Financial identification data (bank details);
- Personal data (gender, age, date and place of birth, nationality).

This personal data is collected when the Customer places an order via our Website. Other personal data may be collected at a later date, for example in the context of our after-sales service.

Visitors:

- Electronic identification data (IP address, location)
- Personal identification data (name, first name, address, login details);
- Contact details (telephone number and e-mail address);

This personal data is collected when you visit our Website and, in particular, when you fill out and submit our contact form.

For which purposes is your personal data used?

The processing of your personal data is essential for the proper functioning of the Website and the provision of associated services. The collection of personal data becomes more extensive as the User makes more intensive use of our Website and our online services.

Ethel commits to solely process your personal data for the following purposes:

Customers:

- Customer management: customer administration, order management, deliveries, invoicing, checking creditworthiness, support and complaint monitoring.
- Personalized marketing and advertising. In that case, the Customer is always entitled to unsubscribe.

Visitors

- Answering requests for information submitted via the contact form on the Website;
- Personalized marketing and advertising if the Visitor has expressly agreed to this. In this case, the Visitor is free to withdraw his consent at any time.

The Data Subject's personal data may also be used for the following purposes:

- Dispute management.
- Protection against fraud and criminal offences.

We also use cookies in order to recognise the (IP address of) Visitors and to offer them a personalised user experience, to remember technical choices (e.g. language choices or a shopping cart), and to detect and correct any errors which might be present on the Website. For more information concerning the use of cookies, we kindly refer you to our Cookie Policy.

When visiting the Website, some data is being collected for statistical purposes. Such data is necessary to optimise your user experience. It concerns the following data: probable location of consultation, hour and day of the consultation and the pages which are being consulted, etc. In order to protect your privacy in the best possible way, this data is always anonymized.

Under no circumstances do we collect sensitive personal data, such as data about your race, political opinions, health, religious and other beliefs, sexual orientation or the like. The User provides the personal data to Ethel himself and therefore retains a certain degree of control. Ethel reserves the right to suspend or cancel certain operations if the required personal data is missing, incorrect or incomplete.

Who receives your personal data?

Your personal data will only be processed for internal use within Ethel. Your personal data will not be sold, passed on or communicated to third parties, unless you have given us your explicit consent beforehand, or if the transmission is necessary for the execution of the agreement or is legally required.

How long do we store your personal data?

Your personal data is stored as long as necessary to achieve the purposes pursued. Your personal data will be erased from our database as soon as it is no longer necessary for the purposes pursued or if you validly exercise your right to erasure.

What are your rights?



Guarantee of a legitimate and secure process of your personal data

Your personal data is solely processed for the legitimate purposes explained in point 5. Your personal data is collected and processed in an appropriate, relevant and non-excessive manner, and is not kept longer than necessary to achieve the intended purposes.



Right to rectification of your personal data

Inaccurate or incomplete personal data may be corrected. It is primarily the responsibility of the User to make the necessary changes in his “user area” himself, but you can also request us in writing.



Right to access

If you can prove your identity, you have the right to obtain information about the processing of your personal data. Thus, you have the right to know the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data is transmitted, the criteria used to determine the data retention period, and the rights that you can exercise on your personal data.



Guarantee of a legitimate and secure process of your personal data

Your personal data is solely processed for the legitimate purposes explained in point 5. Your personal data is collected and processed in an appropriate, relevant and non-excessive manner, and is not kept longer than necessary to achieve the intended purposes.



Right to limitation of processing

In certain cases, you have the right to request the limitation of the processing of your personal data, especially in case of dispute as to the accuracy of the data, if the personal data is necessary in the context of legal proceedings or the time required to Ethel to verify that you can validly exercise your right to erasure.



Right to erasure (or “right to be forgotten”)

You also have the right to obtain the erasure of your personal data under the following assumptions:

- Your personal data is no longer necessary for the intended purposes;
- You withdraw your consent to the processing and there is no other legal ground for processing;
- You have validly exercised your right of opposition;
- Your personal data has been illegally processed;
- Your personal data must be deleted to comply with a legal obligation.

The deletion of personal data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.



Right to withdraw your consent

You may withdraw your consent to the processing of your personal data at any time, for example for direct marketing purposes.



Right to object

You have the right to object at any time to the processing of your personal data for direct marketing purposes. Ethel will stop processing your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over your right to object.



Right to data portability

You have the right to obtain any personal data which you have provided us in a structured, commonly used and machine readable format. At your request, this data may be transferred to another provider unless it is technically impossible.

How to exercise your rights?

If you wish to exercise your rights, you must send a written request and proof of identity by registered mail to Ethel, Heernislaan 19, 9000 Ghent or by email to contact@ethel.eu. We will respond as soon as possible, and no later than one (1) month after receipt of the request.

Possibility to lodge a complaint

If you have any comments or complaints about the way in which we handle your personal data, we ask you to report them to us first. In this way, we can reach an amicable solution by mutual agreement.

If, after this notification, you are still not satisfied with the processing of your personal data by Ethel, you have the right to lodge a complaint with the competent Data Protection Authority (for Belgium: <https://www.dataprotectionauthority.be/>).



Arguing that you don't care about privacy because you have nothing to hide is no different than saying you don't care about free speech because you have nothing to say.
- Edward Snowden.

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