

PRIVACY POLICY Updated

on 01-05-2020

1. Parties and object

Kotpunt NV (hereinafter referred to as "**Digital leap**" or the "**Processing Manager**")

Oudebaan 411, 3000 Leuven

KBO/BTW: 0678655946

E-Mail: hello@digitalleap.agency

Telephone: +32 472 37 75 93

Digital leap establishes this Privacy Policy, which aims to transparently inform Users about the web site hosted at the following address: www.digitalleap.agency, (hereinafter the "**Site**"), the manner in which personal data is collected and processed by Digital leap.

The term "**User**" refers to any user, whether a natural or legal person, who visits the Site or communicates in any way with the Site.

As such, Digital leap determines all technical, legal and organizational means and purposes for the processing of users' personal data. Digital leap undertakes to take all necessary measures to ensure that the processing of personal data is carried out in accordance with the Act of 30 July on the protection of individuals with regard to the processing of personal data (hereinafter the '**Act**') and 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 (hereinafter the '**Regulation**').

Digital leap is free to choose any natural or legal person who will process users' personal data at its request and on its behalf (hereinafter the "Subcontractor"). Where applicable, Digital leap undertakes to select a Subcontractor that provides sufficient guarantees regarding the technical and organizational security measures for the processing of personal data, in accordance with the Law and the Regulation.

2. Processing of personal data

The use of the Site by Users may lead to the disclosure of personal data. The processing of this data by Digital leap, in its capacity of Processing Manager or by service providers acting in the name and on behalf of Digital leap, is done in accordance with the Law and the Regulation.

Personal data will be processed by Digital leap, in accordance with the purposes mentioned below, via:

- subscribe to newsletter
- fill in the contact form

3. Purpose of processing personal data

In accordance with Article 13 of the Regulation, the purposes of the processing of personal data are communicated to the User as follows:

Ensuring the execution of the services offered and agreed via our site

4. Personal data that may be processed

The User agrees that, while visiting and using the Site, Digital leap collects and processes the following personal information in accordance with the terms and principles described in this Privacy Policy:

The information of users that they provide for contractual purposes and to enable the proper performance of mutual obligations

5. Permission

By accessing and using the Site, the User declares that he/she has read and given his/her free, specific, informed and unambiguous consent to the processing of his/her personal data. This agreement relates to the content of this Privacy Policy.

Consent is given by the positive action by which the User has ticked the privacy policy box in hypertext link. This consent is an essential condition to perform certain actions on the Site or to enable the User to enter into a contractual relationship with Digital leap. Any agreement binding Digital leap and a User with respect to the services and goods offered on the Site is subject to the User's acceptance of the Privacy Policy.

The User agrees that, in accordance with the terms and principles set forth in this Privacy Policy, the Processing Agent collects and processes his/her personal data collected on the Site or in connection with the services offered by Digital leap, for the purposes mentioned above.

The User has the right to revoke his consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on prior consent.

6. Retention period of Users' personal data

In accordance with Article 13(2) of the Regulation and the Act, the Data Controller shall only retain personal data for as long as is reasonably necessary to achieve the purposes for which they are processed.

This duration is in all cases shorter than: 1 year

7. Recipients of data and disclosure to third parties

Personal data may be transferred to Digital leap employees, employees, subcontractors or suppliers who provide adequate guarantees for the security of the data and who cooperate with Digital leap in marketing products or providing services. They act under the direct authority of Digital leap, and are in particular responsible for the collection, processing, or outsourcing of these data.

In all cases, the recipients of the data and those to whom the data has been provided comply with the content of this Privacy Policy. Digital leap ensures that they process this data only for the intended purposes and in a discreet and secure manner. In the hypothèse where the data will be disclosed to third parties for direct marketing or prospecting purposes, the user will be informed in advance so that it expresses its consent to the use of these personal data.

8. Data Protection Officer (DPO)

The following person is appointed Data Protection Officer or Data Protection Officer (hereinafter '**DPO**): Jan Luts

The role of the DPO is to ensure the proper implementation of national and supranational provisions on the collection and processing of personal data.

You can contact the DPO as follows:

legal@digitalleap.agency
+32 472 37 75 93 (office hours)

9. Rights of Users

The User may exercise his rights at any time by sending a message by e-mail to the following address: hello@digitalleap.agency, or a letter by post, accompanied by a copy of his identity card to the following address: Oudebaan 411, 3000 Leuven

a. Right of access

In accordance with Article 15 of the Regulation, Digital leap guarantees the User's right of access to his/her personal data. The User has the right to access this personal data and the following information:

- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients established in third countries or international organisations;
- if possible, the proposed period of storage of personal data or, if this is not possible, the criteria used to determine this period;

- the existence of automated decision making, including profiling, as referred to in Article 22(1) and (4) of the Regulation and, at least in such cases, relevant information on the underlying logic and the importance and likely impact of such processing on the data subject

The Processing Responsible Party may claim a reasonable fee based on the administrative costs for additional copies requested by the User.

If the User submits this request electronically (e.g. via e-mail address), the data will be provided in electronic form and for general use, unless the User requests otherwise.

The copy of his data will be communicated to the User at the latest within one month after receipt of the request.

b. Right of rectification

Digital leap guarantees the right of rectification and deletion of personal data to the user.

In accordance with Article 16 of the Regulation, incorrect, inaccurate or irrelevant data may be corrected or deleted at any time. The User will first make the necessary changes from his user account, unless they cannot be made independently, in which case the request can be addressed to Digital leap.

In accordance with Article 19 of the Regulation, the controller shall inform each recipient to whom the personal data have been disclosed of any rectification of the personal data, unless such rectification proves impossible or involves a disproportionate effort. The controller shall provide the data subject with information on these recipients if the data subject so requests.

c. Right of erasure

In the cases mentioned in Article 17 of the Regulation, the User has the right to obtain the removal of his personal data as soon as possible.

Where the Data Controller has made the personal data public and is obliged to delete them pursuant to the previous paragraph, the Data Controller shall take reasonable measures, including technical measures, taking into account available technologies and implementation costs, to inform other data controllers processing such personal data that the data subject has been requested by the data controller to erase the association with such personal data or a copy or reproduction thereof.

The two preceding paragraphs shall not apply to the extent that such processing is necessary:

- the exercise of the right to freedom of expression and information; to comply with a legal obligation to process under Union law or the law of the Member State to which the controller is subject, or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;

- the establishment, exercise or defence of legal claims.

In accordance with Article 19 of the Regulation, the controller shall inform any recipient to whom the personal data have been disclosed of any erasure of personal data or any restriction on their processing, unless such disclosure proves impossible or involves a disproportionate effort. The controller shall provide the data subject with information on these recipients if the data subject so requests.

d. Right to restrict processing

The User has the right to restrict the processing of his personal data in the cases mentioned in Article 19 of the Regulation.

In accordance with Article 19 of the Regulation, the controller shall inform any recipient to whom the personal data have been disclosed of any restriction on the processing carried out, unless such disclosure proves impossible or involves a disproportionate effort. The controller shall provide the data subject with information on these recipients if the data subject so requests.

e. Right to data portability

In accordance with Article 20 of the Regulation, Users have the right to receive their personal data from Digital leap in a structured, commonly used and machine-readable format. Users have the right to transfer these data to another data controller without Digital leap preventing this in the cases provided for in the Regulation.

When the User exercises his right to data portability pursuant to the previous paragraph, he has the right to have personal data transferred directly from one data controller to another, insofar as this is technically possible.

The exercise of the right to data portability shall be without prejudice to the right to erase data. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability does not affect the rights and freedoms of third parties.

f. Right of opposition and automated individual decision making

The User has at all times the right to object to the processing of his/her personal data due to his/her specific situation, including the automation of data by Digital leap. In accordance with Article 21 of the Regulation, Digital leap will no longer process personal data, unless there are legitimate and compelling reasons for processing that take precedence over the interests and rights and freedoms of the User, or for establishing, exercising, or defending legal rights.

When processing personal data for prospecting purposes, the User has the right at all times to object to the processing of personal data relating to him for such prospecting purposes, including profiling insofar as it relates to such prospecting.

If the data subject objects to the processing for the purpose of prospecting, personal data shall no longer be processed for that purpose.

g. Right of complaint

The User has the right to submit a complaint regarding the processing of his personal data by Digital leap to the Data Protection Authority, competent for the Belgian territory. More information can be found on the website: <https://www.gegevensbeschermingsautoriteit.be/>.

Complaints can be submitted to the following addresses:

Data Protection Authority
Rue de la Press 35, 1000 Brussels
Tel. + 32 2 274 48 00
Fax. + 32 2 274 48 35
E-mail: [E-mail: contact@apd-gba.be](mailto:contact@apd-gba.be)

The User may also submit a complaint to the court of first instance of his place of residence.

10. Cookies

The Site uses cookies to distinguish Users from the Site. This makes it possible to provide users with a better browsing experience and to improve the Site and its content. The objectives and methods of cookies are set out in this article.

a. General principles

A "**Cookie**" is a file that is placed temporarily or permanently on the User's hard drive when viewing the Site with a view to a subsequent connection. Thanks to cookies, the server recognises the User's computer.

Cookies can also be installed by third parties with whom Digital leap collaborates.

Some of the cookies used by Digital leap are necessary for the proper functioning of the Site, others are necessary to improve the User's experience.

The User can modify or disable cookies by configuring his browser.

By using the Website, the User expressly agrees to the management of cookies as described in this article.

b. Types of cookies and objectives pursued

Different types of cookies are used by Digital leap on the Site:

- Technical cookies: they are necessary for the operation of the Site, enable the communication of the data entered and are intended to facilitate the User's navigation;

- Statistical and public cookies: these cookies enable the recognition of the User and are used to count the number of Users of the Website over a certain period of time. Because they also indicate surfing behaviour, they are an effective way to improve the User's browsing experience by displaying proposals and offers that may be of interest to the User. They also enable the Digital leap to identify and correct possible bugs on the Website;
- Functional cookies: these cookies make it easier for you to use the Site by preserving certain choices you have made (e.g. username or language);
- Tracking cookies: Digital leap uses tracking cookies through Google Analytics to measure users' interaction with Site content and produce anonymous statistics. These statistics enable Digital leap to improve the Site. Google supports the use of these cookies at the following address: http://www.google.nl/intl/en_uk/policies/privacy/.

c. Storage period for cookies

Cookies are stored for the time necessary to achieve the intended purpose. The cookies that can be stored on the User's hard disk and the storage period are as follows:

ga: 1 year
 _gid: only during this session

d. Management of cookies

If the User does not want the Website to place cookies on his hard disk, he can easily manage or delete them by adjusting his browser settings. Through the programming of the browser, the User can also receive a notice or notification as soon as a Website uses cookies and thus decide whether to accept or refuse them.

If the User disables certain cookies, he accepts that the Site may not function optimally. Some parts of the Site may not be usable or may be partially usable.

If the User wishes to manage and/or delete certain cookies in this way, he/she can do so via the following link(s):

For users with a browser:

- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Microsoft Edge: <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=fr>
- Firefox: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>
- Safari: https://support.apple.com/kb/ph21411?locale=fr_CA

If the User refuses to allow the use of Google Analytics cookies, he or she is invited to configure his or her browser to do so on the following website: <http://tools.google.com/dlpage/gaoptout>.

11. Limitation of Liability of the Processing Responsible Party

The website may contain links to other third party websites that are not linked to Digital leap. The content of these sites and compliance with the law and the regulations are not the responsibility of Digital leap.

The holder of parental authority must give his or her express consent to the minor under the age of 16 to disclose personal information or data on the Site. Digital leap strongly encourages persons exercising parental authority over minors to promote responsible and safe use of the Internet. The Data Protection Officer cannot be held responsible for the collection and processing of personal information and data of minors under the age of 16 whose consent is not effectively covered by that of their legal parents, nor for inaccurate data - especially regarding age - entered by minors. Under no circumstances will personal data be processed by the Data Controller if the user indicates that he/she is under 16 years of age.

Digital leap is not responsible for loss, damage or theft of personal data, especially due to the presence of viruses or after computer attacks.

12. Safety and security

The Data Controller shall implement organisational and technical measures to ensure an appropriate level of security for the processing and collection of data. These security measures depend on the implementation costs related to the nature, context and purposes of the processing of personal data.

The Processing Agent uses standard encryption technologies within the IT industry when transferring or collecting data on the Site.

13. Modification of the Privacy Policy

Digital leap reserves the right to modify this Privacy Policy to comply with legal obligations in this regard. The User is therefore requested to regularly consult the Privacy Policy in order to be informed of any changes and modifications. Such changes will be posted on the Site or sent by email to ensure their enforceability.

14. Applicable law and competent court

This Privacy Policy is governed exclusively by Belgian law. Any dispute will be submitted to the courts of the judicial district of Digital leap's registered office.

15. Contact

For any question or complaint relating to this Privacy Policy, the User may contact the Processing Officer at the following address: hello@digitalleap.agency.