# PRIVACY POLICY OF REVIVE NV

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# **1. YOUR PRIVACY IS IMPORTANT**

Your privacy is important to us. We want to process your personal data with integrity, lawfulness, accuracy and transparency. In this document, our privacy policy, we explain to you how processing takes place and which personal data are involved. The term processing includes collecting, recording, organising, storing, updating, modifying, retrieving, consulting, using, distributing or making available in any way, assembling, combining, archiving, erasing or eventually destroying.

This is about you as a (future) customer of our company, as a beneficiary or a stakeholder or another organisation in contact with us.

### 1.1. PRELIMINARY

We encourage you to read this document carefully so that you know why and for what purpose we process your personal data. We also explain to you which personal data we process when you:

- Use our products and services
- Rent or buy a residential property
- Subscribe to our newsletter
- Ask questions via our website
- Visit our company, fairs and events
- are present during our lectures or speaking engagements
- Use our facebookbot and wifi

You will also read about your rights and how to exercise them.

We may update our privacy policy. The most recent version can be found on our website https://www.revive.be.

Revive NV, lessor and seller of real estate, administrator and performer of this website is active in Belgium, with its registered office located at Nieuwewandeling 62 in 9000 Ghent, VAT number BE 0810.433.812. Revive is the controller of the processing of your personal data.

## 1.3. HOW CAN YOU REACH US?

If you have any questions about your privacy or about exercising your rights, you can reach us at :

- Our postal address at Nieuwewandeling 62 in 9000 Ghent
- Our e-mail address privacy@re-vive.re

Revive has appointed a Data Protection Officer (DPO). You can also contact our DPO at the above coordinates at any time.

# 1.4. REVIVE'S LEAD SUPERVISORY AUTHORITY

For Revive, the Belgian Supervisory Authority is the lead authority: Data Protection Authority, Drukpersstraat 35, 1000 Brussels +32 (0)2.274.48.00 <u>Contact@apd-gba.be</u>

# 2. YOUR RIGHT TO PRIVACY

You have many rights when your personal data is processed. If Revive requests your consent, you can withdraw it at any time.

Implementation of your rights in our systems and procedures will take place no later than 30 days after we receive your request. If for some reason this deadline cannot be met, we will inform you before the expiry of the original period.

### 2.1. YOU HAVE ACCESS TO YOUR PERSONAL DATA

You have the right to have access to your personal data, to the purpose of the processing, where we obtained the data and who receives the data.

You can also get informed how long we keep the data, whether the data is used for automated decision-making and whether we intend to send the data to a country outside the European Union.

We will provide you with the requested information in writing or electronically within a reasonable period of time.

# 2.2. YOU CAN HAVE YOUR DATA CORRECTED/COMPLETED

It may happen that the data we process about you is not or is no longer correct. You can always ask to have the incorrect data corrected or completed with the missing data.

### 2.3. RIGHT TO ERASURE

If you think we are processing personal data unlawfully, you can ask to have this personal data erased.

This request for erasure of personal data may be refused by Revive if justified. Examples include the exercise or substantiation of a legal claim or because of a legal obligation to keep certain data.

## 2.4. RIGHT TO RESTRICTION OF PROCESSING OF PERSONAL DATA

You can ask us to restrict the processing of your personal data if you suspect that the data is inaccurate, the processing is unlawful or if you do not agree that we process the data under our legitimate interest (see 3.3)

We will meet this opposition unless there are compelling reasons not to do so e.g. to prevent fraud, defaults.

# 2.5. RIGHT TO OBJECT

You have the right to object to the processing of your personal data, including profiling. The processing will then be stopped, unless the processing is necessary for compliance with social and tax legislation, to protect the interests of a third party or for the establishment, exercise or substantiation of legal claims.

# 2.6. RIGHT TO DATA PORTABILITY

You can ask us to ask to transfer the personal data you have given to us to a third party.

# 2.7. RIGHT TO COMPLAIN

If you do not agree with our position, you can turn to the Belgian Data Protection Authority. You can also lodge a complaint there. The contact details can be found above in 1.4

### 2.8. IDENTIFICATION OF THE APPLICANT

You can exercise your rights to the processing of your personal data by means of a written request :

- By letter to the address Nieuwewandeling 62 at 9000 Ghent
- By e-mail at the e-mail address privacy@re-vive.re

Always be as specific as possible when exercising your rights. This will allow us to exercise your request correctly.

To prevent someone else from exercising your rights, we want to check your identity as good as possible. Therefore, the application must always be accompanied by a document proving that the identity of the applicant matches your identity. This can be done by attaching a copy of your identity card to the application. In that case, please black out your passport photo and identity card number to protect your privacy. If we find that the delivered document does not provide sufficient proof, we will inform you. We reserve the right not to accept the application until satisfactory proof is provided.

#### 3.1. REVIVE MUST COMPLY WITH LEGAL OBLIGATIONS

We are legally obliged to process your personal data in some cases. Here we list the most important ones:

- Tax law
- Commercial law
- Warranty and guarantee rights
- Verify your identity. This can be done by asking for a clear recent copy of your identity card
- We may be required to disclose personal data to authorities or other third parties. For example, if this is necessary in connection with a statutory obligation (e.g. the Data Retention Directive), for the performance of a task of public interest

### 3.2. REVIVE MUST BE ABLE TO PERFORM ITS CONTRACT WITH YOU

As our customer or tenant, you use our services, buy or rent our residential properties. To assure you of proper execution of our agreement, we need to process these contracts administratively, accountingly and operationally.

This also applies if you are a supplier to Revive. Even then, we must respect the contract and manage these contracts administratively, accounting and operationally.

3.3. REVIVE MUST BE ABLE TO FUNCTION AS A BUSINESS REGARDING DIRECT MARKETING AND COMMUNICATION, AND SELECTION OF NEW EMPLOYEES

Revive is a specialist in developing sustainable real estate by, among other things, transforming old industrial sites into pleasant residential units.

As a commercial company, we have a number of legitimate interests that form the basis for processing personal data. In doing so, we make sure that there is a good balance between your right to privacy and Revive's legitimate interests. Should you still have objections to our processing under this legal basis, you can file an objection.

Our clients and active prospects are ecologically aware individuals seeking information on sustainable housing projects. Revive therefore wishes to inform them about the offer of such properties. This may be on a specific request but equally, we may suspect that our clients and active prospects are interested in our sustainable homes. This requires us to process personal data (including name and an e-mail address) under Revive's legitimate interest. This information can reach you in many ways namely by e-mail, by post, by phone and at events. We choose the most appropriate channel that causes you as little disruption as possible.

If you still do not like our commercial communications, you can object to our direct marketing.

Revive wishes to recruit the best candidate for an open vacancy. To this end, it wants to get the best possible picture of the applicant. Therefore, in addition to the data on the CV, personal data may also be collected via social media and references. This processing is necessary in the legitimate interest of our company.

#### 3.4. REVIVE HAS YOUR CONSENT

Revive is a specialist in developing sustainable real estate by, amongst other things, transforming old industrial sites into pleasant residential units. Our prospective buyers and tenants are ecologically aware people who are specifically looking for information on sustainable housing projects. Revive therefore communicates with its potential buyers and tenants provided they have given their consent to do so at events organised by Revive, via subscription to the newsletter and the contact page on this website.

When you visit our website for the first time, we ask your permission to set our statistical, marketing and social media cookies via our cookie banner.

When subscribing to our newsletter, you give implicit permission to receive information about our services/products. Each newsletter always contains an option to unsubscribe.

As part of a selection procedure for an open job, applicants provide their CV. We therefore process this data with the candidate's consent.

You can withdraw your consent at any time. Our contact details can be found in section 2.8

# 4. WHAT DATA DO WE PROCESS AND FOR WHAT PURPOSES?

#### 4.1. FROM OUR BUSINESS RELATIONS

Business associates include suppliers, customers and prospects. Revive processes personal data of data subjects working for companies with which business is conducted. The purpose for this processing is to provide information on products and services and to maintain business relationships.

To contact and identify you, for our customer and supplier management, we process the following data: name, first name, mobile phone number, e-mail address, cookies and IP address.

#### 4.2. FROM OUR PRIVATE BUYERS

Our private customers buy our real estate at the various building projects. To identify you as a customer, to communicate with you, we process the following personal data: surname, first name, address, gender, date of birth, marital status, telephone number, mobile phone number, e-mail address, bank account number, identity card number, national registration number, financial transactions, IP address of devices and websites visited, cookies

#### 4.3. FROM OUR POTENTIAL BUYERS

Our potential new clients are interested in sustainable real estate projects. Revive is a specialist in developing sustainable real estate by, amongst other things, converting old industrial sites into pleasant residential units. The potential new clients have therefore expressed their interest in our range of building projects. Revive therefore wishes to keep them informed about these real estate projects. To communicate with them, we process the

following personal data: surname, first name, telephone and/or mobile phone number, e-mail address, cookies and IP address.

# 4.4. FROM OUR TENANTS

In the rental market, more and more people are looking for properties where they will be relieved of energy efficiency management, internet access, access to the building, and other various services. Revive, a specialist in sustainable property development, offers these additional services. In order to identify our tenants, communicate with them and offer them the extra services, we process the following personal data:

- Name, address, e-mail address, birth and place of birth, telephone and/or mobile phone number, marital status, gender, national register and identity card number, photo, family situation, professional situation
- Financial data such as bank account, debit and credit card numbers, net income, pay slips, VAT number
- Utility meter readings, access to housing units.
- Logging of internet usage
- IP address of devices and websites visited and cookies

# 4.5. FROM OUR POTENTIAL TENANTS

During the introduction with the potential tenants, we process the name, address, place and date of birth, nationality, fixed and/or mobile telephone number and e-mail address. If this contact leads to a proposal of a rental contract, we also process the information on profession and employment, solvency, family situation, income.

# 4.6. FROM THE NEIGHBOURS AROUND OUR PROJECTS

The renovation of these large industrial sites, is a huge job. Moreover, the location of these sites (in the cities) causes the inevitable nuisance for the neighbours. It is therefore in the interest of the neighbours (the persons concerned) to be informed in time of the upcoming works so that they can make the necessary preparations (e.g. leave earlier, find another route, ...) To be able to communicate with the neighbours, we process the name, address, e-mail address, telephone number and mobile phone number. This processing is done under our legitimate interest.

# 4.7. FROM OUR VISITORS TO OUR BUILDINGS

For security reasons, we like to know who is present in our buildings. If you are our visitor, you register via our tablet at our counter. We process the following data: first name, surname, mobile phone number and e-mail address. This processing falls under our legitimate interest.

# 4.8. PERSONAL DATA FROM OUR JOB APPLICANTS

From applicants, we process the personal data required within the selection procedure. The candidate has provided us with this information, for example through the curriculum vitae, or

we have collected it through other channels such as social media and references. We can always inform the applicant about these other sources.

# 4.9. PERSONAL DATA VIA THIRD PARTIES

We may receive personal data through third parties, for example by purchasing or renting it from companies. Those companies are responsible for ensuring that the personal data in question is collected lawfully.

## 4.10. IMAGES FROM SURVEILLANCE CAMERAS ARE TEMPORARILY STORED

We may use cameras in and around our buildings. Regarding surveillance cameras, we respect the legal rules. You can recognise buildings under camera surveillance by a clearly visible sticker.

Image recordings are kept for a maximum of 30 days. Exceptions are:

- If the images are useful in proving a crime or nuisance
- Proving a damage
- Identify an offender, a witness or a victim

### 4.11. COOKIES

On this website, we use cookies. These are small information files which, when you visit the website, are stored on the device you use to visit our website, such as a computer, tablet or smartphone. Where we refer to "cookies" below, we also mean other similar techniques. Cookies make it possible to recognise your web browser. Useful, because you do not have to re-enter your data, indicate your preferences or change your settings. This way, we can also make our website work better, we can gain insight into visitor behaviour on the website and other parties can gain insight into your surfing behaviour so that they can show personalised ads across multiple websites and omit irrelevant ads. Cookies do not compromise the security of your computer.

We use functional, analytical, marketing and social media cookies. With the exception of functional cookies (necessary for the proper functioning of our website), we ask your permission before placing these small information files. You can find more information about which cookies we use, how long we keep them for and how to deal with them on our <u>cookie policy</u>.

# 5. ABOUT SHARING AND STORING YOUR PERSONAL DATA

### 5.1. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We only share your data with persons, who have been expressly authorised by us, and when they need this data to perform their tasks. These persons will process your data under the same legal basis as we received it from you. Examples are: real estate agents to offer suitable properties to our potential buyers and tenants, subcontractors to make arrangements to carry out various works and site descriptions, notaries, banks, ... We use various processors to process personal data. These are our subcontractors who carry out personal data processing on our behalf. Revive only works with processors who guarantee the same technical and operational security.

We further share your data only if we are required to do so by a law or government order.

We do not sell, rent or transfer your personal data to third parties for their own use.

## 5.2. INTERNATIONAL DATA TRANSFERS

Your personal data is also processed outside the European Union (the European Economic Area, also known as the EEA). It is a given that many major IT suppliers, infrastructure providers and technology companies are not based in the European Union. You can always request this list of the companies that process data for us outside the EEA. We provide adequate contractual guarantees so that your data can also enjoy an adequate level of protection with them.

# 5.3. WE DO NOT KEEP YOUR DATA INDEFINITELY

Revive uses your personal data with a clear purpose in mind. When this purpose is achieved, the data will be deleted.

The starting point for keeping your personal data is the legal retention period.

We initially keep the personal data of potential new customers for 5 years. Should there have been a contact between the prospect and Revive during this period, a new 5-year period starts from this contact.

We initially keep the personal data of existing customers, suppliers, subcontractors, etc. for 10 years. Should there have been a new contact during this period, a new 10-year period starts from this contact.

We also keep the place descriptions for 10 years.

After 30 days, our visitors' personal data disappear from our registration system.

We keep the data of applicants who have not been retained for a maximum of three years after the selection procedure is completed. Afterwards, we delete the data.

We keep the personal data of neighbours around our projects for 1 year after the completion of the respective project.

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