

Our policy on the processing of Personal Data (GDPR)

1. GENERAL

1.1. EECKMAN SERVICES ensures that it carries out its activities with respect for your privacy, regarding the processing of your personal data. This privacy policy explains how and why we collect and use your data. We also inform you of the rights you have in relation to the processing of your personal data, and how you can exercise them.

We process your personal data in accordance with the applicable data protection legislation, which includes the General Data Protection Regulation (Regulation 2016/679) ("GDPR") and national data protection laws, including that of 30 July 2018 on the protection of individuals about the processing of personal data.

1.2. EECKMAN SERVICES is the Controller, within the meaning of the GDPR. Our full contact details are the following:

EECKMAN SERVICES

Rue Marconi 167

1190 Forest

BCE 0740.573.125

Mail: underwriting@eckman.eu

1.3. For any questions concerning the processing of your personal data or to exercise your rights granted by the GDPR, please contact our Data Protection Officer ("DPO") by email at the following address: dpo@eckman.eu.

1.4. This Privacy Policy applies only to "personal data" or "personal data" within the meaning of the GDPR, excluding statistical results provided as aggregated and anonymized data by EECKMAN SERVICES.

"Personal data" is defined as data relating to an identified or identifiable individual, whether directly or indirectly, that (i) you provide to us yourself, or (ii) we allocate to you to enable you to use our services, or (iii) is generated by your use of our services or by your activity on our website.

2. TO WHOM IS THIS PRIVACY POLICY ADDRESSED?

This Privacy policy is addressed to the following:

- Our partner insurance intermediaries;
- The final clients – our policyholders via one of our partner insurance intermediaries;
- The visitors of our website <https://www.eeckman-underwriting.com/> ;
- Any other parties in contact with us.

3. WHAT CATEGORIES OF PERSONAL DATA DOES EECKMAN SERVICES COLLECT AND PROCESS AND FOR WHAT PURPOSES?

3.1. IF YOU ARE A PARTNER INSURANCE INTERMEDIARY

We are collecting the following personal data:

- Your personal identification data (surname, first name);
- Your contact details (postal address, email, telephone);
- Your professional data (company, function, etc);

We usually only process data that are strictly necessary for conclusion and administration of the contracts that you wish to conclude.

We process the data above-mentioned to:

- 1) Conclude and perform the contract you have signed or wish to sign with us;
- 2) To comply with our legal obligations;
- 3) Send you targeted advertisements to promote our services or keep you informed of our activities via our newsletter.

3.2. IF YOU ARE A FINAL CLIENT – A POLICYHOLDER VIA A PARTNER INSURANCE INTERMEDIARY

If you are a natural person and that you have subscribed to an insurance through one of our partner insurance intermediaries, we are collecting the following personal data:

- Your personal identification data (name, first name, date of birth, national register, ID number card, driving licence, nationality, language);
- Your contact details (postal address, email, telephone);
- Your professional details (employment, function);
- Your family details (social status, children, etc);
- Your bank details.

If you are representing a legal person and that you have subscribed to an insurance through one of our partner insurance intermediaries, we are collecting the following personal data:

- Your personal identification data (surname, first name);
- Your contact details (postal address, email, telephone);
- Your professional data (company, function, etc);
- The UBO details of the company (surname, name, postal address, nationality, date of birth);

We usually only process data that are strictly necessary for conclusion and administration of the contracts that you wish to conclude.

Other than the identification details that you communicate to us by completing our form or during any other subsequent contacts with our company, we collect various personal data about you depending on the type of contract you wish to take out and the nature and size of the risk being insured.

We process the data above-mentioned to:

- 4) Conclude and perform the contract you have signed or wish to sign with us;

- 5) To comply with our legal obligations;
- 6) Send you targeted advertisements to promote our services or keep you informed of our activities via our newsletter.

3.3. IF YOU ARE A VISITOR OF OUR WEBSITE OR IF YOU CONTACTED US

We are collecting the following personal data:

- your personal identification data (surname, first name, date of birth);
- your contact details (email, telephone);
- the content of your message;
- information collected via cookies in accordance with the cookie policy;

We process your data in order to:

- 1) contact you where you have left your details to obtain further information about our services (consent);
- 2) if you are a natural person looking for an insurance product, to redirect you to one of our partner insurance intermediaries by transmitting your contact data to them in order to respond adequately to your request;
- 3) make your use of our website as efficient and comfortable as possible (collection of statistics) and protect our IT systems from attacks and other illegal activities (see Cookie Policy);

4. TO WHOM WILL YOUR PERSONAL DATA BE TRANSFERRED?

As a rule, the personal data that we collect under contracts concluded between us are intended for our exclusive use.

However, EECKMAN SERVICES reserves the right to entrust the hosting or processing of your personal data to subcontractors offering every guarantee of reliability and security, and with whom we have concluded a confidentiality agreement. These subcontractors or service providers that we use may only process your data in accordance with the instructions we give them and in accordance with this Privacy Policy.

EECKMAN SERVICES only passes your data to the insurance company that provides the policy you have taken out through us and to the other parties involved in the contractual process (experts and/or subcontractors). All other disclosures to third parties are subject to your express prior consent.

We may also transfer your personal data to public authorities or other third parties when required by law.

Where our suppliers and subcontractors are located in countries outside the European Economic Area, EECKMAN SERVICES will ensure that appropriate precautions and security measures are put in place to guarantee the security and confidentiality of your personal data. EECKMAN SERVICES will take the following precautions:

- The country to which the personal data is transferred has received an adequacy decision from the European Commission under Article 45 of the GDPR and the transfer falls within the scope of that adequacy decision;
- Has concluded a contract with the recipient of the personal data containing the standard contractual clauses for the protection of personal data adopted by the European Commission under Article 47 of the GDPR.

In general, EECKMAN SERVICES will try not to transfer personal data outside the European Economic Area, unless it is impossible to operate otherwise.

5. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We store your personal data for the time necessary to conclude the contract, to perform the contract or to monitor our contractual relationship.

We will delete your personal data as soon as the purpose for which it was collected and processed ceases to exist and on expiry of the following period:

- 1) Data processed in the context of the performance of a (future) contract is:
 - Actively stored for the period necessary for the performance of the contract;
 - At the end of our contract, will be stored for a further period of 10 years corresponding to the statutory limitation period for contractual actions. This storage period will be suspended in the event of administrative or legal proceedings relating to the contract until the proceedings are concluded. The data will thus be permanently deleted at the end of the 10-year limitation period or at the end of any proceedings if the 10-year period has expired in the meantime.
- 2) The data of persons who have contacted us for pre-contractual measures without concluding a contract or to obtain additional information is retained and will be deleted after 2 years if no further action has been taken by them within this period.
- 3) The information collected during your visit to our website will be deleted in accordance with the cookie policy.

6. WHAT ARE THE SECURITY MEASURES IMPLEMENTED BY EECKMAN SERVICES?

To protect your personal data against loss, destruction and unauthorised access or manipulation, EECKMAN SERVICES has taken both technical and organisational security measures under the supervision of our Data Protection Officer to ensure that your data are processed in complete security.

This means, on the one hand, that our computer system is equipped with backup, filtering and firewall systems to protect your personal data and, on the other hand, that our employees have been made aware of the risks of data breaches and trained to handle your personal data correctly, and that access to your personal data is only granted to authorised persons in the context of the performance of their duties.

Our internal password policy applies to all our user accounts:

- Our passwords are protected by MFA (Multi-factor authentication / token)
- Our passwords are submitted on following properties and requirements
 - Allowed characters:
 - A – Z
 - a – z
 - 0 – 9
 - @ # \$ % ^ & * - _ ! + = [] { } | \ : ' , . ? / ` ~ " () ;
 - blank space
 - Not allowed characters:
 - Unicode characters
 - Password restrictions
 - A minimum of 8 characters and a maximum of 256 characters.
 - Requires three out of four of the following:
 - Lowercase characters.
 - Uppercase characters.
 - Numbers (0-9).
 - Symbols (see the previous password restrictions).
 - Password expiry duration
 - Default value: 270 days.
 - The value is configurable by using the `Set-MsolPasswordPolicy` cmdlet from the Azure Active Directory Module for Windows PowerShell.
 - Password expiry notification
 - Default value: 14 days (before password expires).
 - The value is configurable by using the `Set-MsolPasswordPolicy` cmdlet.
 - Password change history
 - The last password *can't* be used again when the user changes a password.
 - Password reset history
 - The last password *can't* be used again when the user resets a forgotten password.
 - Account lockout
 - After 10 unsuccessful sign-in attempts with the wrong password, the user is locked out for one minute. Further incorrect sign-in attempts lock out the user for increasing durations of time. Smart lockout tracks the last three bad password hashes to avoid incrementing the lockout counter for the same password. If someone enters the same bad password multiple times, this behavior will not cause the account to lockout.

We ensure that within our organisation, access to your data is reserved solely for the persons who are responsible for following up your contracts.

7. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

As a data subject, you may exercise the following rights in relation to your personal data:

Right to access:

You have the right to obtain from EECKMAN SERVICES confirmation as to whether, or not your personal data are being processed, and where that is the case, access to it and to obtain information on the origin of the data and the nature of the processing carried out.

Any request for access will only be granted if EECKMAN SERVICES is able to identify you with certainty based on the information in its possession. Any request for access to your data must be accompanied by a copy of your identity card.

EECKMAN SERVICES has 30 days to respond to your request, this period only starting from the moment that EECKMAN SERVICES is in possession of all the information required to satisfy your request.

Right to rectification:

If necessary, you have the right to obtain from EECKMAN SERVICES the rectification of inaccurate personal data concerning you, free of charge.

Right to withdraw consent:

Whenever permitted by law, in particular if the processing of your personal data is based solely on your consent, you may notify us anytime that you are withdrawing your consent to the use by EECKMAN SERVICES of the personal data that you have spontaneously provided to us during your visit to its website.

You can withdraw your consent by sending a simple request by e-mail to dpo@eckman.eu, or by clicking on the “unsubscribe” link which is provided for that purpose at the bottom of the e-mail when you do not wish to receive anymore.

The withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal or of processing based on a legitimacy other than consent.

Right to erasure:

You have the right to obtain the erasure of your personal data, which are no longer necessary in relation to the purposes for which they were collected and whose storage is not or no longer required under the contract or a legal obligation to which EECKMAN SERVICES is bound by sending us a request to this effect at the following address: dpo@eckman.eu.

Right to object:

You always have the right to object, without providing for a reason and free of charge, to the use of your personal data for direct marketing purposes.

You may unsubscribe from newsletters sent to you at any time by activating the link provided for this purpose in each email or advertisement or by sending us a request to this effect at the following address: dpo@eckman.eu.

Right to restriction of processing:

Under certain conditions, you have the right to request limited processing, in which case your personal data may, except for storage, only be processed by EECKMAN SERVICES with your consent or for the establishment, exercise or defence of legal claims, for the protection of the rights of third parties or for important reasons of public interest.

Right to data portability:

If technically possible, you have the right to ask us to transfer your personal data to another data controller.

Right to lodge a complaint

If you consider that your rights in relation to the processing of your personal data are not respected by EECKMAN SERVICES, you may lodge a complaint with our Data Protection Officer at the following address: dpo@eckman.eu or, if it has not been satisfactorily addressed, with the Data Protection Authority.

8. OTHER LINKED WEBSITES

Our website may contain links to other websites provided by third parties.

EECKMAN SERVICES is not responsible for the content or privacy practices of other sites, even if you accessed a third party's website using links on our website.

When you visit these other sites, we strongly recommend that you check the privacy policies of those sites before disclosing any personal information.

9. CHANGES TO THIS POLICY

EECKMAN SERVICES reserves the right to amend or modify this Policy without notice. If necessary, EECKMAN SERVICES will post the changes on this page along with the date of the revision. The amended Privacy Policy will apply from the date of such revision. It is your responsibility to check the Policy each time you visit this website.