

## **PRIVACY POLICY**

**WEBSITE:**

**Vivactis UK**

### **ARTICLE 1: PREAMBULE**

This privacy policy applies to website: Vivactis UK.

The purpose of this privacy policy is to expose users of the site to:

- The way in which their personal data is collected and processed. Must be considered as personal data all data that can identify a user. These include the first and last name, age, postal address, email address, location of the user or his IP address;
- What are the rights of users regarding this data;
- Who is responsible for the processing of personal data collected and processed;
- To whom these data are transmitted;
- If applicable, the site's policy regarding "cookie" files.

This privacy policy supplements the legal notices and the General Conditions of Use that users can consult at the following address:

<https://www.vivactis.uk/legal-notice/>

## **ARTICLE 2: GENERAL PRINCIPLES FOR DATA COLLECTION AND PROCESSING**

In accordance with the provisions of Article 5 of European Regulation 2016/679, the collection and processing of site user data complies with the following principles:

- Lawfulness, fairness, and transparency: data can only be collected and processed with the consent of the user who owns the data. Each time personal data is collected, the user will be informed that his data is collected, and for what reasons his data is collected;
- Limited purposes: the collection and processing of data is carried out to meet one or more objectives determined in these general conditions of use;
- Minimization of the collection and processing of data: only the data necessary for the proper execution of the objectives pursued by the site are collected;
- Retention of reduced data over time: the data is kept for a limited period, of which the user is informed. When this information cannot be communicated, the user is informed of the criteria used to determine the retention period;
- Integrity and confidentiality of the data collected and processed: the data controller undertakes to guarantee the integrity and confidentiality of the data collected.

In order to be lawful, and in accordance with the requirements of Article 6 of European Regulation 2016/679, the collection and processing of personal data can only take place if they comply with at least one of the conditions below:

- The user has expressly consented to the processing;
- The processing is necessary for the proper performance of a contract;
- The processing responds to a legal obligation;
- The processing is explained by a necessity linked to the safeguarding of the vital interests of the data subject or of another natural person;
- The processing can be explained by a necessity linked to the performance of a task in the public interest or which comes under the exercise of official authority;
- The processing and collection of personal data is necessary for the purposes of the legitimate and private interests pursued by the controller or by a third party.

## **ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED IN THE CONTEXT OF BROWSING ON THE SITE**

### **A. COLLECTED DATA, PROCESS AND COLLECTION METHOD**

The personal data collected on the Vivactis UK site are as follows:

Name, Surname, e-mail

This data is collected when the user performs one of the following operations on the site :

When the user contacts us via the contact form.

The data controller will keep all the data collected in its computer systems on the site and under reasonable security conditions for a period of : 5 years.

The collection and processing of data meets the following purposes :

User data is encrypted to allow Vivactis UK to follow up on all requests made via its website.

### **B. TRANSMISSION OF DATA TO THIRD PARTIES**

The personal data collected by the site is not transmitted to any third party and is only processed by the site editor.

### **C. DATA HOSTING**

The Vivactis UK site is hosted by: Business Solutions, whose head office is located at the following address:

57 Av. Gustave Demey, 1160 Auderghem

The host can be contacted at the following telephone number : +32 (0)2 771 21 51

The data collected and processed by the site is transferred to the following country(ies): Belgium.

## **ARTICLE 4 : DATA PROCESSOR**

### **A. THE DATA PROCESSOR**

The person responsible for processing personal data is: Nadia Papaioannou. She can be contacted as follows:

The data processor can be contacted Monday to Friday between 9 AM and 5 PM via the following email address [info@vivactis.com](mailto:info@vivactis.com)

The data controller is responsible for determining the purposes and means used for the processing of personal data.

## **B. OBLIGATIONS OF THE DATA PROCESSOR**

The data controller is committed to protect the personal data collected, not to transmit them to third parties without the user having been informed and to respect the purposes for which these data were collected.

The website has an SSL certificate to ensure that information and data transfer passing through the site are secure.

An SSL certificate ("Secure Socket Layer" Certificate) aims to secure the data exchanged between the user and the site.

In addition, the data controller undertakes to notify the user in the event of rectification or deletion of the data, unless this entails disproportionate formalities, costs, and procedures for him.

In the event that the integrity, confidentiality, or security of the user's personal data is compromised, the controller undertakes to inform the user by any means.

## **ARTICLE 5 : USER RIGHTS**

In accordance with the regulations concerning the processing of personal data, the user has the rights listed hereby.

In order for the data controller to comply with his request, the user is required to communicate to him: his first and last name as well as his e-mail address.

The data controller is required to respond to the user within a maximum of 30 (thirty) days.

## **A. PRESENTATION OF USER RIGHTS REGARDING DATA COLLECTION AND PROCESSING**

*a. Right of access, rectification and right to erasure*

The user can read, update, modify or request the deletion of the data concerning him, by respecting the procedure set out below:

The user must send an e-mail to the personal data controller, specifying the subject of his request and using the contact e-mail address provided above.

*b. Right to data portability*

The user has the right to request the portability of his personal data, held by the site, to another site, by complying with the following procedure:

The user must make a request for the portability of his personal data, by sending an e-mail to the address provided above.

*c. Right to restriction and opposition of data processing*

The user has the right to request the limitation or to oppose the processing of his data by the site, without the site being able to refuse, except by demonstrating the existence of legitimate and compelling reasons, which may prevail over the interests and the rights and freedoms of the user.

In order to request the limitation of the processing of his data or to oppose the processing of his data, the user must follow the following procedure:

The user must make a request to limit the processing of his data or oppose their processing, by sending an e-mail to the address provided above.

*d. Right not to be the subject of a decision based exclusively on an automated process*

In accordance with the provisions of Regulation 2016/679, the user has the right not to be the subject of a decision based exclusively on an automated process if the decision produces legal effects concerning him, or significantly affects him in a similar way.

*e. Right to determine fate of data after death*

The user is reminded that he can organize what should be the future of his collected data and processed if he dies, in accordance with law n ° 2016-1321 of October 7, 2016.

*f. Right to appeal to the competent supervisory authority*

In the event that the data controller decides not to respond to the user's request, and the user wishes to contest this decision, or, if he thinks that one of the rights listed above is infringed, he is entitled to appeal to the CNIL (Commission Nationale de l'Informatique et des Libertés, <https://www.cnil.fr>) or any competent judge.

**B. PERSONAL DATA OF MINORS**

In accordance with the provisions of Article 8 of European Regulation 2016/679 and the Data Protection Act, only minors aged 15 or over can consent to the processing of their personal data.

If the user is a minor under the age of 15, the agreement of a legal representative will be required so that personal data can be collected and processed.

The publisher of the site reserves the right to verify by any means that the user is over 15 years old, or that he has obtained the agreement of a legal representative before browsing the site.

**ARTICLE 6 : USE OF "COOKIES"**

The site may use "cookie" techniques.

A "cookie" is a small file (less than 4 KB), stored by the site on the user's hard drive, containing information relating to the user's browsing habits.

These files allow it to process statistics and traffic information, to facilitate navigation and to improve the service for the comfort of the user.

For the use of "cookie" files involving the saving and analysis of personal data, the consent of the user is necessarily requested.

This user consent is considered valid for a maximum of 13 (thirteen) months. At the end of this period, the site will again request the user's authorization to save "cookie" files on their hard drive.

*a. Opposition of the user to the use of "cookies" files by the site*

It is brought to the attention of the user that he can oppose the recording of these "cookie" files by configuring his navigation software.

For information, the user can find at the following addresses the steps to follow in order to configure his navigation software to oppose the recording of "cookie" files:

- **Chrome** : <https://support.google.com/accounts/answer/61416?hl=fr>
- **Firefox** : <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- **Safari** : <http://www.apple.com/legal/privacy/fr-ww/>
- **Internet Explorer** : <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Opera** : <http://www.opera.com/help/tutorials/security/cookies/>

In the event that the user decides to deactivate the "cookie" files, he may continue browsing the site. However, any malfunction of the site caused by this manipulation could not be considered as being due to the publisher of the site.

*b. Description of the "cookie" files used by the site*

The site editor draws the user's attention to the fact that the following cookies are used during browsing:

PHPSESSID: this cookie enables communication between the web server and the browser, and temporarily stores information about your session;  
 \_icl\_current\_language: cookie used by wpml so that the language selected by the user to browse the site remains active.

By browsing the site, the user is informed that third-party "cookie" files may be recorded.

These are more particularly the following third parties:

Google Analytics

In addition, the site incorporates social network buttons, allowing the user to share their activity on the site. "Cookie" files from these social networks are therefore likely to be stored on the user's computer when using these features.

The user's attention is drawn to the fact that these sites have their own privacy policies and general conditions of use that may differ from the site. The site editor invites users to consult the privacy policies and general conditions of use of these sites.

**ARTICLE 7 : TERMS OF MODIFICATION OF THE PRIVACY POLICY**

This privacy policy can be consulted at any time at the address indicated below:

<https://www.vivactis.uk/privacy-policy/>

The publisher of the site reserves the right to modify it in order to guarantee its conformity with the law in force.

Consequently, the user is invited to regularly consult this privacy policy in order to stay informed of the latest changes that will be made to it.

It is brought to the user's attention that the last update of this privacy policy took place on: 26/04/2022.

## **ARTICLE 8 : USER ACCEPTANCE OF THE PRIVACY POLICY**

By browsing the site, the user certifies that he has read and understood this privacy policy and accepts its conditions, with particular regard to the collection and processing of his personal data, as well as the use of files. "Cookies".