

PRIVACY STATEMENT COLOR NAVIGATOR

At Color Navigator we value the protection of personal data. We treat and secure personal data always in accordance to Belgian law and the GDPR (General Data Protection Regulation).

In this privacy statement we explain who we are, when and why we need your personal data, which personal data we collect, how we collect them and for how long, to who we can disclose them and what your rights are within the GDPR.

What is Color Navigator?

Color Navigator is a Belgian limited company, located at Bouwensstraat 21 in Antwerp, with registered number 0635 632 189 that is part of the UMAN360 holding.

Our mission is to help companies with the impact of color, in each segment of their business, and to use this knowledge in their communication, design and innovation strategy. We coach companies to make the right color and design choices and we create measurable results. Next to that we also deliver color expertise via tools and software (e.g. MyColorPassport).

For all your questions, requests or complaints about your personal data at Color Navigator, you can contact us at this email address: dpo@colornavigator.net.

Color Navigator processes personal data in accordance to their business purpose and this can involve data from people who use our software tools, visit our website, staff members, applicants etc.

What personal data does Color Navigator process?

Color Navigator processes personal data that is required for the implementation of arrangements and agreements that were made in the context of its activities, and also processes data that is necessary so that Color Navigator can carry out its commercial activities.

This can mean your name, email address, language of choice, your company, your bank account number, etc but also information you share with Color Navigator as a current or potential partner, applicant, client etc.

When you visit our website, we can capture information about the use of our website and public data (such as social media profiles or mentions on a website) can be visible to us via website tracking technologies. More information about this can be found under the chapter of cookies

Color Navigator processes very little sensitive personal data within the meaning of the GDPR.

Legal basis and objectives of the processing

The processing in the context of proposed or ongoing arrangements and agreements is in fact also the main legal basis for the data processing by Color Navigator and its members.

If required, your additional, explicit and specific permission will be requested for the processing of your personal data in conformance with the GDPR. Permission granted can, in principle, be withdrawn electronically and at no charge, unless of course there is another legal basis for the processing.

In this regard, Color Navigator notes that the company or its members can also process your data based on a 'legitimate interest' in the processing. In this way, for example, Color Navigator can inform you about new products and services that can be of potential interest to you if you have already entered into

a relationship in this regard with Color Navigator. As it has done in the past, Color Navigator will of course always do this within reasonable limit and never in a way that is aggressive or unwanted.

Wat is the source of the personal data?

Color Navigator receives the data they process in first instance from the natural persons concerned themselves (directly) and from the connected companies in the UMAN360 holding. Mostly this is personal data of employees and independant contractors. Of course, we will never misuse this data.

Color Navigator can use services of third parties, such as Hubspot that uses website tracking technology to observe your activity, interaction and other computer information (such as IP-adres). This is done via cookies, that are also used to collect data about the uses of our website and services. They make it possible also to observe data that is made public on social media or websites such as LinkedIn.

How long do we keep personal data?

Color Navigator will not save the personal data that they process any longer than is required for the purposes of the processing.

In theory, Color Navigator will not save the personal data for longer than 10 years starting as of the moment at which the data was obtained. If required, for example, in case of judicial proceedings, the personal data may of course be required to be saved for longer.

Color Navigator does not save the personal data of its staff (identification, performance, salary, declaration RSZ,...) for longer than 5 years after the termination of the employment agreement/service agreement, except in case of a lawsuit, in which case the data can be processed up to a maximum of three years after the final processing of that data. Any sensitive data will only be saved for the length of time required for the implementation of the relevant agreement or for as long as it must be saved for whatever reason.

Color Navigator keeps the personal data that they possess up to date and changes or corrects the data where required.

How do we secure your personal data?

Color Navigator guarantees the integrity, the security and the confidentiality of the personal data, both technically and organizationally. Color Navigator saves important/sensitive personal data on its own secure servers or on secure servers of third parties that are also GDPR compliant.

Processing by/transfer to external partners?

Color Navigator processes the personal data itself initially (both internally and externally for information and communication purposes). Color Navigator and its members will only transfer data to third party if this is necessary. Of course, only the data that is strictly necessary will be provided.

Color Navigator also transfers personal data to external partners (e.g. social office, insurance company etc), however only to the degree required to carry out its activities and its task as company. Color Navigator and its members and connected companies within the UMAN360 holding can also share information between them where required.

The transfer of personal data to foreign parties outside the EU can also prove to be an absolute necessity within the framework of the implementation of certain agreements and the involved party therefore grants its permission for this processing. If Color Navigator transfers personal data to a party outside the EU that is not on a list of 'safe countries' (in the context of the GDPR), to the extent possible, they will demand the appropriate security safeguards.

Color Navigator will ensure to the greatest possible extent that the external partners that process personal data for them or that are (jointly) responsible for the data processing comply with the provisions of the GDPR. To do that, we will do everything possible to enter into 'processing agreements' with the main partners. A list of these partners is available upon request.

What are your rights under the GDPR?

Color Navigator guarantees that you as an involved natural person can exercise the rights that the GDPR grants you (information, access, copy, correction, erasure, restriction of and objection to the processing and data portability).

You can exercise your rights at no charge and electronically using the contact information specified at the start of this privacy statement. Color Navigator can only charge you administrative costs in case of overly burdensome requests.

Why do we use cookies on our website?

We use cookies to get analytics of our website. This helps us to see how visitors use our website and how we can improve our website. We also use cookies of third parties (such as Hubspot) for marketing & sales reasons.

A cookie is a small, simple data file that a website saves on your hard drive through the browser. Information is also saved in a cookie. By default, most browsers are configured to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is sent. However, in that case, you might not be able to make full use of some functions and services offered by our website and others.

Do you have a complaint or question about your personal data?

Your contact person at Color Navigator was indicated above. If you have a complaint, you can also submit that to the supervisory authority. In Belgium, that is the Data Protection Authority or GBA (www.privacycommission.be), which is the new name of the privacy commission. You can also always lodge an appeal through the national courts.

If you have noticed a data leak or do you have a suspicion of it, please contact us immediately via dpo@colornavigator.net.

Version of this privacy statement

Color Navigator can always update this privacy statement. To get the most actual version, please have a look on our website **www.colornavigator.net**.

This statement was last updated on 14 January 2019.