

**Information on the Processing of Personal Data carried out by Palladium Belgium SA, ("Palladium" or "Data Controller") provided to the Data Subject under Art. 13 of Regulation (EU) 2016/679 (from now on "Regulation" or "GDPR")**

Before processing any Personal Data (in the future also "**Data**"), the Controller must inform you (the "**Data Subject**") on the why and how of the Data Processing. For that reason, this notice will give you all the information you need so that you can provide your Data in an informed and conscious manner and, at any time, request and obtain clarifications or corrections, as well as exercise your rights.

### 1. Data controller

The Regulation defines the Data Controller as the natural or legal person, public authority, service or other bodies that, individually or jointly with others, determines the purposes and means of the processing of personal data.

In this case, the Data Controller is **Palladium Belgium SA**, with registered office in Boulevard A. Max 13/17 bte 7 – 1000 Bruxelles. Palladium is a part of Palladium Group (in future, the "**Group**").

### 2. Type of Personal Data collected

The website you are visiting acquires various kinds of Personal Data, such as:

- i. **Data directly inserted by you by filling in the website's forms**, such as place, type of contract and estate unite requested, name, surname, company, city, telephone, e-mail (\*) and request description. Data marked with this symbol (\*) are mandatory;
- ii. **Data collected automatically** as a result of your navigation on the site, such as IP addresses, time of the request, country of origin, characteristics of your browser and operating system.

The Data Controller will process your Data in compliance with the provisions of the law and the principles applicable to the protection of Personal Data. Processing operations will only take place with regard to the purposes indicated in paragraph 3 below and according to methods and procedures aimed at ensuring the integrity, availability and confidentiality of what you share with us.

### 3. Purposes of the processing

In this paragraph, we will describe you the purposes - in other words, the **reasons** - for which we request and process your Data.

Here are our goals:

- i. **Handle** your requests regarding Group initiatives and the rental/purchase/sale of real estate units, either if we receive them by telephone, e-mail, personally or through a contact form on the website. The Data processed for the pursuit of such purpose are listed in the previous § 2, n. (i);
- ii. **Manage** your browsing and allow the technical functioning of the website, also in order to improve its performance. Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (ii);
- iii. **Contact** you for promotional purposes, also via newsletters. The Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (i);
- iv. **Carry out** analyses to understand, for example, how the site is used, which are the most viewed contents as well as offers of particular interest to the public. The Data processed for the pursuit of this purpose are those listed in the previous § 2, n. (ii). We list the suppliers we use and invite you to read their privacy policy if you would wish further information;
- v. in the event that you express an interest for the services offered by the companies of the Group, **allow** the Data Controller, to share your Data with the aforesaid companies in order to allow the conclusion of the deal.

### 4. The legal basis for the Processing of Personal Data

#### PALLADIUM Belgium SA/NV

Boulevard A. Max 13/17 bte 7/A. Maxlaan 13/17 bus 7 – 1000 Bruxelles/Brussel

Tel. +32 2 743 24 20 Fax : +32 2 743 24 40

E-mail : pbe.office@palladium-group.com - Website: www.palladium-group.be

Before we proceed, we would like to explain you in clear and plain language what a “legal basis” means.

As a rule, Personal Data may not be used by anyone (otherwise it would not be personal). There are, however, some cases in which the legal system allows processing: if, for example, you decide to buy an estate unit offered by Palladium or by others company of the Group, and contact us through the form on the site, your data will be used to fulfil such request. Likewise, you may decide to give us your e-mail address to receive promotions and offers from us. In situations of this kind, the Data Controller acts on a valid legal basis, and can therefore legitimately process Personal Data.

In the present case, purposes referred to in points (i) and (ii) sub § 3 are carried out for the execution of pre-contractual measures or for the provision of a service expressly requested by you. This is the case, for example, when you contact us to obtain information on a particular estate unit.

Processing under point (iii) sub § 3 can be only pursued with your free, informed, specific, unequivocal and always revocable consent. In other words, Palladium or any other entity within the Group may not and will not send you offers and other commercial suggestions without your permission.

With regard to the purpose mentioned in point (v) sub § 3, the Data Controller refers to Recital no. 48 of the Regulation according to which companies that are part of a group “*may have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes*”. Consequently, this purpose will be pursued through the legal basis of the legitimate interest of the Data Controller.

## 5. Modalities, places and times of the processing

The processing of data is carried out under the principles of lawfulness, necessity and relevance with the help of electronic and/or automated means.

Processing is carried out directly at Palladium headquarters by authorised personnel. In some cases, external parties may also process your Data (for example, service companies, professionals and consultants). Such parties are bound to the Controller through a specific act of appointment as external Data Processor. Such act obliges third-parties to comply with the standards imposed by the Regulation, so that your Data is safe. The list of all the subjects involved in the Processing can be requested to the Data Controller at any time.

Your Personal Data will be processed by the Data Controller for the time necessary to achieve the purpose referred to in § 3 (i-iii) of this notice, as indicated in Recital 39 of the Regulation, without prejudice to a further period of retention that may be imposed or permitted by law as also provided for in Recital 65 of the Regulation.

The processing carried out to achieve the purposes referred to in point (iv) of § 3 will take place until you communicate your intention to withdraw your consent. If consent is revoked, the Data Controller will cease processing your personal data for such purposes.

## 6. Data Communication

The Data Controller may communicate your Data for the Purposes referred to in § 3 [**with particular regard to point (v) above**] to other companies of the Palladium Group, also vested as Data Controller, for the administrative management of requests, booking of appointments, assistance and/or commercial information to the interested party, IT companies and system security companies.

Your Data will not be disclosed otherwise.

## 7. Rights of the Data Subject

The Regulation grants you the right to:

1. access and obtain the correction or updating of inaccurate Data;
2. obtain the cancellation of Data processed unlawfully or unnecessarily with regard to the purposes for which the Data were collected and processed. The request for removal may not be granted when the processing is necessary to fulfil a legal obligation or exercise a legal right of Palladium;
3. obtain the limitation of the processing of Data if the accuracy of the Personal Data is contested, and only for the period necessary for us to verify whether the conditions set out in point 1 and 2 above are met;



4. receive Data about themselves in a commonly used and machine-readable form;

5. object to the processing for reasons related to the particular situation of the data subject. However, you are aware that we may continue to process your Data if we can prove that legitimate reasons for continuing the processing still exist, and only if such reasons prevail over your rights, interests and freedoms (for example, when we need Data to ascertain, exercise or defend a right in court. The Data Subject may also object to the Processing of Data for direct marketing purposes including profiling to the extent that it is connected to such direct marketing;

6. request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject except in cases where profiling is necessary for the conclusion or performance of a contract;

7. file a complaint with the supervisory authority.

#### **8. Data Controller and Data Processor**

To exercise your rights as identified above, or for any request regarding the Processing of Your Personal Data, please feel free to contact the Data Controller using the following contact information:

**Palladium Belgium SA**, Avenue Boulevard A. Max 13/17 bte 7/A. Maxlaan 13/17 bus 7 – 1000 Bruxelles/Brussels;  
Tel. +32 2 743 24 20 Fax : +32 2 743 24 40; email: [pbe.office@palladium-group.com](mailto:pbe.office@palladium-group.com)

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