



Privacy Notice

Version 1.0 – 25/03/2024

Protecting your personal data is very important to us. We are therefore fully committed to respecting any and all laws and regulations on the protection of personal data, such as, without being limited to the General Data Protection Regulation (GDPR).

That is why we would like to use this Privacy Notice to explain to you what information we may process about you; how we use such information; and with whom we share such information.

1. Who are we?

We are **Spotable BV**, a company with registered office at Lentedreef 4, 8520 Kuurne, Belgium and registered in the Belgian Crossroads Bank for Enterprises under the number BE 1008.603.030. We are responsible for deciding why and how the personal data we collect from you is processed. This means that we are to be considered as the data controller in relation to the processing of such data.

You can contact us for all issues or questions relating to the processing of your personal data by using the contact details below:

Address: Lentedreef 4, 8520 Kuurne
Email: sebastien@spotable.be
Telephone: +32 479 805 919

2. Which personal data do we collect and how do we use it?

(i) Property data processed when a real property gets listed (end users)

When a **real property gets listed on a public real estate website**, we automatically collect the property data relating to such real property through a technique called web scraping.

The property data we collect on such basis includes the following information, some of which constitutes personal data:

- Property information (such as: sold date, property type, price, ...)
- Building details (such as: EPC Score, Plot Size,...)
- Outdoor features (such as: pool presence, garden area,...)
- Indoor features (such as: internet connection presence,...)

We only collect data relating to real property. We never collect any personal data relating to the property owner other than the abovementioned data linked to the real property.

We process this property data on the basis of a legitimate interest we believe to exist in being able to efficiently link sold properties to suppliers and/or service providers with new property owners who might be interested in purchasing products and/or services from the respective suppliers in relation to the property. In other words, we use the property data to allow such suppliers to send you direct marketing messages via post only.

Because we only facilitate postal marketing and do not process any other personal data about you and because we believe you could be interested in such postal marketing given the recent property you purchased, we do not see such processing as excessively interfering with your right to privacy. Further information on the balancing test we carried out in this respect can be found in our Legitimate Interest Assessment, which may be made available on request.

We also like to note that you may always opt-out from our data processing activities by sending us and email at sebastien@spotable.be. In addition, we also would like to remind you that you can always opt-out from receiving postal marketing at your address in a more general way by registering your address on the so-called Robinson list ([Robinson Lijst](#)).

(ii) Personal data processed when you buy services from us (B2B clients)

When your company **buys services** from us, we may process the following information about you as a contact for your company: name and surname, company name, function title, address, email address, (mobile) phone number.

We use such information only for the following purposes:

- (i) To execute the primary process of project management for you as our customer and to keep in touch during projects. In such case, we process your personal data because this is necessary in order to execute the contract concluded between us and your company;
- (ii) To keep in touch after a project has finished to align on potential new project opportunities. In such case, we process your personal data on the basis of your consent to contact you for further projects or because we feel we would be able to help your company on a certain similar project in the future;
- (iii) To create your customer account in our systems, send you invoices for services delivered and follow-up on payment. In such case, the processing of your personal data is also necessary to execute the contract concluded between us and your company.

Your personal data will not be used for any other purpose. Please note that we may not be able to provide our service to your company in case you do not wish to provide us with certain information for the purposes mentioned in points (i) to (iii) above.

(i) Personal data processed when you connect with us on our website

When you use the contact form on our website, we collect the following personal data from you: your name and surname, your email address, your telephone number, your company and your message. This information is mandatory for you to provide in order for us to be able to get in touch with you. We only process this information to get in touch with you upon your request. By submitting such request via our contact form, you have consented to us contacting you by using the data provided.

On our website we may also make use of cookies and social media plugins, primarily to optimise your experience on the website. For specific information about the cookies used on our website, please consult our cookie notice.

3. With whom do we share your data?

We will share the property data we collect in relation to a specific property with our B2B clients as part of the service that they buy from us. Once they receive such property data, they have the right to use such data in their own right, meaning that they will also act as data controller in relation to such property data. To find out more about how our clients process your data, we kindly request you to consult their respective privacy notice.

Your personal data may also be shared with external service providers that we use to conduct some internal or external tasks for us (e.g. external IT provider, etc.). Such service providers only act as data processors for us and we will enter into the necessary data processing agreements with these service providers to ensure your personal data remains adequately protected by them. Your personal data may also be shared with other group companies.

Aside from this, we do not transfer any personal data to third parties, unless we are obliged to do so based on mandatory legal provisions (e.g. disclosure to external bodies, such as supervisory or law enforcement bodies) and/or as a result of a court or government order.

4. Are your data transferred abroad?

No, in principle your personal data are not transferred outside the EEA.

Insofar as transfers outside the EEA are necessary at some point in time, we will always take the necessary measures to ensure that your personal data are duly protected and that all transfers of personal data outside the EEA take place in a lawful manner (e.g. by having the recipient sign a copy of the standard contractual clauses of the European Commission or by asking your explicit consent to be able to do so).

5. How long do we keep your personal data?

We do not keep your personal data any longer than necessary to achieve the intended purpose for which your personal data are collected.

In practice, we apply the following retention periods:

- (i) **For property data processed when a real property gets listed:** Property data is stored by use during 24 months following collection or until you opt-out of our data processing activities;
- (ii) **For personal data collected when you buy from us:** Information collected in the framework of our customer relationship will be stored for 10 years following the end of the customer relationship.

Notwithstanding the foregoing, we may not be able to delete certain personal data if there is a legal retention obligation to keep such personal data, if a statute of limitation is still applicable or if we need this data in the context of a legal claim.

6. How are your personal data secured?

We have taken all reasonable and adequate technical and organisational security measures to protect your personal data as best as possible against accidental or intentional (and unauthorised) manipulation, modification, publication, loss, abuse, destruction or access by unauthorised persons. Such measures include amongst others a limited access policy and strong password protection.

7. Your rights relating to your data?

Based on the GDPR you have a right (insofar as the concrete conditions of application for such a right are fulfilled) to:

- Access to and information about the personal data processed about you;
- Be forgotten, or ask me to delete your personal data;
- Rectification and completion;
- Transferability of personal data;
- Restriction of processing;
- Object to the processing.

To exercise these rights, you can contact us by email at the following address: sebastien@spotable.be. We will respond to your request as quickly as possible, but in any case within four weeks following receipt of your request.

8. Do you have a question or complaint?

If you have a question complaint about the way in which I process your personal data, you can always inform us via sebastien@spotable.be so that we can deal with the issue together.

You may also file a complaint with the Belgian Data Protection Authority at any time:


Website:


<https://www.autoriteprotectiondonnees.be/citoyen/agir/introduire-une-plainte>

Contact details:

Data Protection Authority

Rue de la Presse 35, 1000 Brussels, Belgium

 +32 (0)2 274 48 00

 +32 (0)2 274 48 35

 contact@apd-gba.be

9. What law is applicable to this Privacy Notice?

Any dispute in relation to this Privacy Notice must be interpreted in accordance with Belgian law.

10. Amendments

We may change, complete or supplement this Privacy Notice from time to time without prior notice. The new version will apply from your next visit to the website. We therefore invite you to always consult the latest version of this Privacy Notice on the website.