

1. Introduction

The purpose of this document is to explain how **The Podcast Factory Org** (and their projects "hrmeetup", "Midoricast" and "What's your Story") below "we" collects, uses and stores personal data (below 'the data').

For the purposes of this document "The Podcast Factory Org" refers to **The Podcast Factory Org - ASBL/VZW**, with registered office in Belgium, Jules Bordetlaan 13 – 1140 Evere.

"The data" we refer to here are all the personal data concerning you, i.e. all the information enabling you to be identified directly or indirectly as a natural person.

The processing of your data is subject to compliance with the Belgian laws and Regulation (EU) 2016/679 of 27 April 2016 on data protection, known as the "GDPR", or any other legislative act amending them (below "the current regulations").

This document on data protection describes the uses made of these data and all the rights at your disposal. The contractual conditions applicable remain unchanged. The contractual provisions referring to this document concern and apply to natural persons only, in accordance with the law, even where these provisions refer to a legal person.

We invite you to read this document carefully to understand the practices in this respect. It is updated regularly. The most recent version is available at all times free of charge on our websites.

Any general information on personal data protection is obtainable from the Data Protection Authority. Any questions relating to our processing of your data can be addressed to us by e-mail to : guest@thepodcastfactory.org .

2. Controller of your data

We are responsible for the processing of your data. As a result, with regard to your data, we are your contact and are accountable to the supervisory authorities for compliance with the current regulations. We determine the purposes for which your data are processed, the means used and all the characteristics of the processing, as explained in this document.

It is possible that we may intervene as processor and process your data in the context of provision of services on behalf of other enterprises or organisations, by following their instructions and conforming to their own guidelines. In such cases, these partners are solely responsible for the processing of your data.

3. Rights

You have the rights listed below with respect to all the purposes described in this document.

You may exercise your rights by written request, signed and dated, to be communicated either by post to: The podcast Factory Org, Jules Bordetlaan 13, 1140 Evere or by email to guest@thepodcastfactory.org .

We reserve the right to contact the person who has sent the request to verify that person's identity.

When we act as processor, the request must be addressed to our partner, which is the sole controller of the personal data.

3.1. *Right of access*

The right of access implies in particular the possibility to ask us if we are processing your data; for what purposes these data are processed; the categories of data processed; the recipients to whom they are communicated.

This right of access may be subject to certain special procedures, namely where your data contain information relating to other persons.

3.2. *Right to rectification*

If you find that your data are inaccurate or incomplete, we make every endeavour to rectify or supplement these data as soon as possible.

3.3. *Right to erasure ("right to be forgotten")*

Under the right to erasure, you can ask us to erase your data.

In certain cases, in particular to comply with a legal obligation, and in accordance with this document, we may however store data which are necessary, for example, for us to pursue our activities.

3.4. Right to portability of your data

Pursuant to this right, you can ask us to transmit your data to you or directly to another controller, where this is technically feasible.

3.5. Right to object

You have the right to object to the use of your data where these are processed in particular for the purposes of enabling us to pursue a legitimate interest, of profiling based on a legitimate interest, of statistics or of marketing.

In the context of market surveys and direct marketing, we ask your consent to use your data in order to send you commercial information, advertising or personalised proposals (through direct marketing actions or electronic newsletters). You are entitled, if you no longer wish to receive communications, to object to the processing of your data, where appropriate, for certain types of communication, by deleting the options selected.

You are not able under any circumstances to prevent the processing of your data where this is necessary, in particular, to conclude or perform a contract or if the processing has been imposed by law or regulation.

3.6. Right to restriction of processing

In accordance with the current regulations, you have the right to obtain the restriction of the processing of your data, in particular:

- Where you have contested the accuracy of your data and we have to verify it;
- Where the processing is unlawful and you oppose their erasure and request the restriction of their use instead;
- Where we no longer need your data for the purposes of processing, but they are still required for the establishment, exercise or defence of legal claims;
- Where you have objected to processing based on a legitimate interest and we have to verify whether the grounds of the legitimate interest we are pursuing override yours.

Where processing has been restricted, such data, with the exception of storage, may be processed only with your consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person.

4. Use of the data collected

We may process data and information of any kind, provided by you or by third parties, in so far as is necessary or helpful for the pursuit of our activities.

4.1. Types of data

- (i) Personal data

We use the following data in particular for the following purposes:

Type of data	Example of data	Purpose of use
Identification	Surname and first name, address and location	In order to contact you and to send you any documents relating to your contract (examples: contract, equipment, events, etc.), we need to know your identity.
	E-mail address	We use your e-mail address to confirm to you, where appropriate, the participation of a formation or event, to keep you informed of the inscriptions of an event and future activities, to send you satisfaction surveys, but also to inform you of special offers in progress and of the advantages you receive.
	Telephone number	We may need to call you in the context of the performance of a contract but also to know your opinion on the services you have received, inform you of the current special offers, offer you the product most suited to your needs.
	Area of interest	By accepting cookies on our site, we adapt the advertisements on the Internet pages so that they correspond to the interest you have shown through your behaviour on our site.
Profiling	Payment details	For example, when you buy via or directly on the site, your payment details are needed to be able to finalise and confirm your purchase.
	IP address	In order to recognise you on the Internet, we need your IP address. This address enables us to retain your preferences and to offer you a personalised service.

4.2. Purposes of data use

Your data are collected in order to act in your interests (a) or, in certain cases, in our interests (b).

(a) PURSUIT OF YOUR INTERESTS

In general, we use your data in the following cases:

- For taking all the measures necessary for the conclusion and performance of the contract (i);
- For sending electronic communications (ii);

(i) Conclusion and performance of a contract

Before concluding a contract, we have to obtain and process certain data in order, in particular:

- To respond to a request on your part;
- To follow up a request, assess the appropriateness and, for insurance contracts, evaluate the risks associated with a possible contract;
- To follow up a request for information;
- To draw your attention to the fact that you have not finalised the process to conclude a contract;
- To assist you in the process of online registration, in the provision of information and in the conclusion of the contract.

Where we are unable to process applications for membership or requests relating to specific products or services, without first obtaining certain data from you (such as substantiating documents, contact details, etc.), we notify you of this and we reserve the right not to follow up a request before receiving the information requested.

For contracts in progress and the performance of contracts concluded, we implement a certain number of processes and data processing operations, of various kinds, including in order to take account of general administrative and accounting obligations.

In this context, your data can be transmitted in-house through various departments, including those which are not directly entrusted with the relationship with you or the performance of a specific contract. Likewise, exchanges of information with you in the course of performance of the contracts may be carried out by means of different communication channels, notably online services made available to you.

Following the conclusion of a contract, we use your data for:

- Management and delivery of products and services;
- Management of our relations with our customers and members;
 - We offer you several ways of contacting us, such as, for example, by post, e-mail, telephone, Facebook, Instagram, Twitter and LinkedIn. The information concerning you is stored so that we can provide you with optimum service. This takes the form, among others, of improved navigability of our site and the conducting of market surveys;
 - When you call us, your telephone call may be recorded. We always inform you of this at the beginning of the call. The aim is in particular to improve our services and to react in a well-considered manner in the case of complaint;

(ii) Sending of electronic communications

We can process your electronic contact details, i.e. your mobile telephone number and your e-mail address, in order to send you information, where appropriate personalised, through:

- Newsletters;
- Direct marketing or market surveys.

In this case, we request your consent in advance which is then the subject of a specific, unambiguous request, preceded by clear information which is easily understood and you can withdraw at any time. For example, with respect to the sending of newsletters, you can click on the link “Unsubscribe” located at the end of the electronic newsletter sent to you.

(b) **PURSUIT OF OUR INTERESTS**

Your data are also processed in order to enable us to achieve certain objectives which constitute legitimate interests, i.e. in particular:

- Inform you on various subjects relating the development of our products and services when you have been receiving this information for a certain time without having ever objected and, consequently, we can reasonably consider that you expect to receive it and that there is a relevant and appropriate relationship between us;
- Prepare studies, models (risks, marketing, etc.) and statistics, by having recourse to techniques of anonymisation and/or pseudonymisation of the data subjects;
- Monitor the activities (sales measurements, number of telephone calls, number of visitors to the site, etc.);
- Establish, exercise, defend and preserve our rights and those of persons we may represent, for example during recovery proceedings or disputes;
- Analyse the results of the marketing activities and campaigns in order to assess their effectiveness and with a view to offering you relevant solutions.

In all cases, we check that the data processing is always necessary for the purposes of the legitimate interests we pursue and ensure that the right balance is maintained between the needs to process these data and the respect of your rights and freedoms, including the protection of privacy.

4.3. Data communication

In connection with the purposes mentioned in this document, we may sometimes communicate your data within (a) or outside the The Podcast Factory Org (b).

(a) **WITHIN THE PODCAST FACTORY ORG**

We process your data with the greatest care and we share them within the The Podcast Factory Org only with a view to offering you the best services in the context of the performance of your contract.

(b) **OUTSIDE THE PODCAST FACTORY ORG**

When we act on behalf of commercial partners, for example as intermediary for an insurance undertaking, we may transfer data to these partners, in accordance with their instructions.

Moreover, we can call on specialised enterprises which assist us in:

- The design and maintenance of Internet tools and applications;
- The marketing of our activities, the organisation of events and the management of customer communications;
- The preparation of reports and statistics, the printing of documents and product design;
- The performance, management and monitoring of operations, including the reporting, support and IT security or the supply of specific services and products.

In the cases listed above, we ensure that third parties have only limited access to the data which are strictly necessary to complete the specific tasks required. We also ensure that third parties undertake to use the data in a secure and confidential manner and use them in accordance with our instructions.

Apart from in these cases, all the data collected will never be communicated to third parties without your explicit authorisation.

5. Data storage

In general, we make sure to store your data for a period no longer than is necessary to achieve the purposes for which they were obtained or for which they are subsequently processed.

We distinguish a holding period and an archiving period beyond which your personal data are either erased or anonymised.

5.1. Retention period

The retention period is the maximum period of use of your data for processing for specific purposes.

In general, all the data are retained throughout the contractual relationship or where it exists, as stipulated in this document, a consent for specified purposes or a legitimate interest.

In certain cases, to enable us to pursue our profession of insurer, we retain certain data once the contractual relationship has ended, such as, for example, to establish the risk profile, in accordance with the specifications in this document.

5.2. Archiving period

The archiving period complies with the statutory and tax obligations and the legal necessity to store your data beyond the retention period, for purposes of proof or to meet requests for information from the competent authorities.

6. Security

We implement the necessary technical and organisational measures to ensure confidentiality of the processing relating to the data concerning you.

Exchanges relating to data including financial information (credit card number, for example) are transmitted via a secure channel using encryption mechanisms. These mechanisms are based on the issuing of a certificate by an internationally recognised body.

Technical and organisational protection measures, such as in particular anti-virus, firewalls, access controls, rigorous selection of staff and suppliers, have been put in place with a view to preventing and detecting access, losses or inappropriate disclosures of your data.

In the unlikely and unfortunate event of your data under our control being compromised through a breach of information security, we shall act rapidly to identify the cause of this breach and shall take the appropriate remedial actions. If necessary, in accordance with the current law, we shall inform you of this incident.

7. Submission of a complaint concerning the processing of your data

In the event of a conflict concerning the processing of your data, you may contact us through the following channels:

- By post: The podcast Factory Org, Jules Bordetlaan 13, 1140 Evere
- By e-mail at the address [quest@thepodcastfactory.org](mailto:guest@thepodcastfactory.org);

- Via our contact pages of our websites

You can also submit a complaint to the Data Protection Authority either by post to rue de la Presse 35, 1000 Brussels, or by e-mail to **commission@privacycommission.be**, or by telephone at +32 2 274 48 00.

8. Use of cookies

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If you do not wish our sites to place cookies on your computer disk, you can modify the settings of your computer. In this case, it is possible that certain functionalities of our sites are less easily accessible.