

PRIVACY & DATA PROTECTION POLICY

1. INTRODUCTION

Opteco BV, a company governed by Belgian law, having its registered office at 3520 Zonhoven, Senator A. Jeurissenlaan 1020 registered under the number 0500.511.189) (hereinafter: "Opteco" or "We") as Data Controller, will only collect, keep, process and transfer (hereinafter: "Processing") your Personal Data (as indicated below) in accordance with the applicable Belgian and EU privacy legislation including but not limited to the EU Regulation 2016/676 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), (hereinafter: "GDPR").

In this privacy and data protection policy (hereinafter: "Policy"), we describe how we collect, for what purpose, on which legal grounds and how long we store any information relating to you or allowing your direct or indirect identification (hereinafter: "Personal Data"). We will also inform you with whom your Personal Data may be shared, what your rights are and how we protect your Personal Data.

This Policy shall apply to all your visits and use of the website (www.opteco.be), as well as all communications in relation to agreements that are (to be) signed with Opteco relating to the delivery of the products and/or services of Opteco (hereinafter: "Contract").

If you accept the provisions of this Policy, this means that you agree with the way we are processing your Personal Data as set out in this Policy and that you acknowledge that this is necessary for the products/services rendered in execution of the Contract and/or for the purpose of our legitimate interest.

2. WHEN WILL YOUR PERSONAL DATA BE COLLECTED?

We will collect your personal data when you:

- Visit our website (www.opteco.be);
- Fill in our registration forms;
- Request an offer on our website;
- Contact us and hand over your Personal Data, for example by e-mail or telephone;
- Sign and fill in an offer/contract regarding the purchase/use of our products and/or services;
- Apply for a job with us.

3. WHICH OF YOUR PERSONAL DATA WILL BE COLLECTED?

Below you can find an overview of the (categories of) Personal Data which we process, the purpose of the Processing, the legal grounds for the Processing, and the applicable retention periods:

A. Categories of Personal data:

1. Personal Data you provide to us:

- Identification & contact details: Name, surname, address, e-mail address, phone number;
- Location: Your postal, home address, professional address and/or other location where the

products/services will be delivered/performed;

- Payment details: Bank account number,...

2. Data regarding the installed Opteco product(s):

- Electricity consumption; Pictures before and after installation;
- (Storage) Device ID and the ID of the control unit;
- EAN Number and/or MPAN number (of the electricity supply meter at the property where the product(s) of Opteco is/are located);

3. Data that is provided to us automatically when you visit our website:

- Technical data: such as IP address;
- Data Processed by Cookies (see our Cookie Policy);

4. Legal Grounds:

When we process your Personal Data, we will always rely on one of the following legal grounds:

- The Processing is necessary for the performance of a contract you are a party to or in order to take the steps at your request to enter into the Contract.
- Processing is necessary for the purposes of our legitimate interest except where our interests are overridden by your fundamental rights and freedoms:

a. To provide you with information on our similar products and services and to respond to your questions/complaints/inquiries;

b. To compile anonymized statistical data;

c. ...

- We may occasionally ask you for your specific permission to process some of your Personal Data, and we will only do so if you give your permission. Please note that you can withdraw your consent at any time by sending an e-mail to info@opteco.be.

- When processing your Personal Data is required to comply with a legal obligation:

a. Tax purposes

b. Providing information to a public body or law enforcement agency

c. Following a court order;

d. Etc.

5. Purposes of processing:

We will only process your Personal Data for specific purposes. Please note that we do not intend to further process your Personal Data for a purpose other than described below.

We will process your Personal Data:

- To be able to provide you with our products/services for ex. the installation of solar panels, heat pump boilers; home batteries etc.;
- To be able to provide you with an account after registration on our website and/or mobile application, and provide you all necessary log-in details for all subsequent access to and use of your

user profile;

- For all interactions you have with us regarding our products/services. This includes but is not limited to, enter into an agreement with us, to place an order, administrative or technical purposes to ensure the functionality of our products, etc.;
- For other interactions we may have with you. For ex. if you contact us with questions, remarks, complaints or other enquiries, we use your Personal Data to respond to your enquiry;
- To maintain accuracy and relevance of your Personal Data;
- For marketing purposes such as the registration for a newsletter;
- To improve the quality of our service and website;
- General and financial administration;
- To process and evaluate your application for a job at Opteco;
- To better understand how you use our digital platform and to gain insight in the statistical reports of overall website activity.

6. Retention period

We will only store your Personal Data as long as necessary while ensuring appropriate protection of your Personal Data. How long we keep your Personal Data depends on the purpose we use it for as described in this Policy.

Unless otherwise required by law or specified by Opteco, your Personal Data will be deleted or anonymized after 5 years at the latest.

4. HOW DO WE PROTECT YOUR PERSONAL DATA?

We have a set of technical and organizational security measures in place to protect your Personal Data against unlawful or unauthorized access or use, as well as against accidental loss or damage to their integrity. These measures have been designed, taking into account our IT infrastructure, the potential impact on your privacy and the costs involved and in accordance with current industry standards and practices.

Your Personal Data will only be processed by a third party if that third party agrees to comply with those technical and organizational data security measures.

5. WHAT ABOUT COOKIES?

We use so-called 'cookies'. Cookies may be considered as pieces of data that are sent by the webserver to your browser who writes these data to the hard disk of your computer or mobile device. By using cookies, we may offer you a quicker and more efficient entry to our website. You can turn off the use of cookies in your browser settings. If you disable the use of cookies, Opteco is still accessible, but you may not have access to all of its functionalities.

For further information about our use of cookies and on how to avoid them, please consult our cookie policy.

[View our Cookie Policy \(/cookies\)](#)

6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Depending on the purposes for which we collect your Personal Data, we may share your Personal Data with another affiliate or subsidiary of Opteco. An up-to-date list of current affiliates and subsidiaries can be found here <https://www.opteco.be/affiliates>.

Furthermore, for the purpose of providing our services, we may share your Personal Data with other third parties who are our trusted partners in ensuring our operability and the continuity of our services. You can find an up-to-date list of the recipients and/or categories of recipients and their respective privacy policies here: <https://www.opteco.be/affiliates>. By signing this Policy, you agree with how our trusted partners are Processing your Personal Data and you acknowledge that transferring the Personal Data to our trusted partners and their Processing of the Personal Data, is necessary for the performance of the Contract and/or the purpose of our legitimate interest.

7. DO WE TRANSFER YOUR PERSONAL DATA INTERNATIONALLY?

For the purposes of providing our services it is possible that we transfer your Personal Data with third parties in other countries within the European Economic Area (EEA) who deliver an adequate level of protection in accordance with the GDPR.

It is possible that your Personal Data may be transferred to a partner of Opteco outside the European Economic Area (EEA). Any transfer to a recipient who has his domicile or registered office in a country which is not covered by an adequacy decision ([link](#)), issued by the European Commission, will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses ([link](#)).

8. WHAT ARE YOUR RIGHTS?

Please note that you have the following rights in relation to our processing of your Personal Data:

- Right to access and correction: you have the right to access your Personal Data. Before providing access, we may ask for proof of identity and the necessary information about your interactions with us for security purposes. If we agree that we are obliged to grant you access, we will do so free of charge but only for your first request. If the Personal Data we hold about you is incorrect, you may always ask us to correct any inaccuracies;
- Right to restrict processing: you have the right to request a restriction of processing if we are not entitled to use your Personal Data (anymore) or if you contest its accuracy;
- Right to object processing: where applicable, you have the right to object to us processing your Personal Data for certain purposes. In particular, you have the right to object to direct marketing (e.g. e-mails) free of charge and without any justification;
- Right to erasure: you have the right to have any of your Personal Data erased (except in some cases, for example, to prove a transaction or when required by law);
- Right to data portability: under certain conditions, you have the right to receive your Personal Data, which you have provided to us, in a commonly used, structured machine readable format and to transmit your Personal Data to any third party of your choice.
- Right to withdraw consent: Where your Personal Data is processed based on your consent, you may withdraw this consent at any time without justification;

You can make a request or exercise these rights by contacting us (see art. 9 for our contact details) and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards. However please be aware of the fact that the Personal

Data (and the Processing) is necessary for the performance of the Contract and/or the purposes of our legitimate interest. This implies that that any adjustment to your initial consent, may result in a termination of the Contract.

We will endeavor to respond within 4 weeks to your request.

9. HOW CAN YOU LODGE A COMPLAINT?

If you do not agree with the way we process your Personal Data, you can always file a complaint with us by e-mail info@opteco.be.

If you are not satisfied with our response/solution you – in any case – have the right to lodge a complaint with the Belgian Data Protection Authority acting as the supervisory authority:

Drukpersstraat 35

1000 Brussels (BELGIUM)

Tel: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

Mail: contact@apd-gba.be

10. CHANGES TO OUR POLICY

We may modify this Policy from time to time to reflect our current privacy practices. We encourage you to periodically review this Policy to be informed on how we process and protect your Personal Data.

This Policy was last updated on August 9, 2021

Opteco - Senator A. Jeurissenlaan 1020, 3520 Zonhoven

011/36 04 36 - info@opteco.be - BE 0500.511.189