
PRIVACY POLICY

The protection of your personal data is of utmost importance to us. We make every effort to safeguard your privacy and ensure that you can entrust your personal data to us securely. We handle personal data in a safe and discreet manner and have implemented appropriate protective measures to prevent loss, alteration, unauthorized access, and/or any other unlawful processing of your personal data.

We aim to be transparent about the way in which your personal data are collected and used. We recommend that you read this privacy statement carefully to be informed about how we handle personal data.

Who are we?

We are RSQ Investors, a division of Quanteus Group, registered under the number 0882.672.878, RLE Brussels (hereafter, '**we** of '**us** of '**our**).

You can contact us using the following contact details:

Email:	Info@rsqinvestors.eu
Phone number:	+32 (0) 2 704 91 60
Address:	Culliganlaan 2C, 1831 Diegem

We process your personal data in strict accordance with the applicable legal provisions for the protection of personal data, including Regulation (EU) 2016/679 of April 27, 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 (hereinafter, the 'GDPR'), as well as the applicable national implementing legislation.

Definitions

For the purposes of this privacy policy, 'personal data' refers to all information concerning an identified or identifiable natural person ('the data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. In essence, it encompasses all information that can be used to identify a person. This includes, for example, your name, first name, date of birth, telephone number, and email address, as well as your IP address, order history, etc.

The term 'processing' is very broad and encompasses, among other things, the collection, recording, organization, storage, updating, modification, retrieval, consultation, use, dissemination, combination, archiving, and deletion of data

Controller of Your Personal Data Processing ('Data Controller')

This privacy statement applies to the processing of personal data described herein, carried out by us as the controller of your personal data processing.

We are, as defined by the GDPR, the 'data controller' of your personal data. This signifies that we, possibly together with others, determine the purpose and means of processing your personal data

Which personal data do we process, why, and based on which legal ground?

In the table below, you will find:

- **Column 1:** the categories of personal data we process (the '**Categories of Personal Data**');;
- **Column 2:** the reasons for this processing (the '**Purposes**');;
- **Column 3:** the legal basis for the processing activity (the '**Legal Ground**');; and
- **Column 4:** the duration for which we process your personal data (the '**Retention Period**').

Each processing activity of your personal data is carried out for one or more specific purposes.

Additionally, there is always a demonstrable legal ground for each processing. The applicable legal ground, which you will find in the third column 'Legal Ground,' has the following meanings

- 'Consent': you have given **consent** for the processing of personal data for one or more specific purposes;
- 'Legitimate Interest': the processing is necessary for the purposes of the **legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;
- 'Contract': the processing is necessary for the performance of a **contract** to which you are a party, or in order to take steps at your request prior to entering into a contract;
- 'Legal Obligation': the processing is necessary for compliance with a **legal obligation** to which we, as the data controller, are subject.

Categories of Personal Data	Purposes	Legal basis	Retention period
Processing during the use of our website			
Identificatiegegevens (telefoonnummer, IP-adres en IMEI-code, sessiegegevens), taalkeuze	To provide you access to our website	Consent	Until the end of your visit to our website

Identification data (phone number, IP address, and IMEI code, session data), language preference, and information about your use of our website	To improve our products, (customer) services, and website experience using Analytics reports	Consent	Until you withdraw consent – read more about this in our cookie policy (Cookiebeleid (EU) - Total Energy Projects)
Identification and contact details (first name, last name, email address, phone number), application data (curriculum vitae, additional information)	To enable you to apply for an open vacancy published on our website	Consent	Until four weeks after the end of the application process, unless you give consent for us to retain the data longer
Identification and contact details (first name, last name, email address, phone number), application data (curriculum vitae, additional information)	To enable you to submit an unsolicited application via the website	Consent	Until four weeks after the end of the application process, unless you give consent for us to retain the data longer
Identification and contact details (customer number, name, phone number, email address) and your query/complaint	Responding to your query or complaint via the contact form on the website or through social media platforms	Consent	For as long as your query or message is being handled by us and potentially up to 10 years thereafter in case of a potential (legal) dispute and as long as necessary to defend our rights in a legal proceeding
Processing when you contact us by phone			
Identification and contact details (customer number, name, phone number) and recording of the phone conversation	To improve the quality of our (telephone) services	Legitimate interest	30 days
Identification and contact details (customer number, name, phone number) and recording of the phone conversation	Evidence collection of commercial transactions via phone	Agreement	During the term of the agreement and potentially up to 10 years thereafter in the event of a

			potential (legal) dispute, and for as long as necessary to defend our rights in legal proceedings
Identification and contact details (customer number, name, phone number) and recording of the phone conversation	Evidence collection in cases of verbal aggression towards employees	Legitimate interest	5 years or as long as necessary for the case to be handled by a judicial authority.
Identification and contact details (customer number, name, phone number) and recording of the phone conversation	For appraisal of employees and co-workers	Agreement	During the term of the employment relationship and up to 5 years thereafter (in the event of legal proceedings: for as long as necessary to defend our rights in the legal proceedings)
Processing when you request a quote or visit our company			
Identification and contact details (name, phone number, email address, address)	To provide you with a non-binding quote	Consent	For up to a maximum of 2 years after you have given consent.
Identification and contact details (name, phone number, email address, address)	Processing your request to schedule an appointment with one of our advisors.	Consent	For up to a maximum of 2 years after you have given consent.
Identification and contact details (name, phone number, email address, position)	or the registration of visitors (e.g., potential business partners, prospects, etc.) to our company.	Consent	For up to a maximum of 2 years after you have given consent.
Processing when you place an order or enter into an agreement with us.			
Identification and contact details (customer number, name, phone number, address, possibly delivery address), payment and credit information, order history, language	For the conclusion and execution of our sales and/or maintenance agreement (including but not limited to invoicing and service provision).	Agreement	During the term of the agreement and potentially up to 10 years thereafter in the event of a potential (legal) dispute, and for as

preference, national registration number (if legally required), information relevant to the delivery (e.g., when you are available)			long as necessary to defend our rights in legal proceedings.
Identification and contact details (company name, name of contact person, phone number, address), correspondence, and other relevant information in the context of our collaboration."	For the conclusion and execution of our collaboration agreement.	Agreement	During the term of the agreement and potentially up to 10 years thereafter in the event of a potential (legal) dispute, and for as long as necessary to defend our rights in legal proceedings
Identification and contact details (customer number, name, phone number, address), order history.	To send you suitable offers and newsletters as a customer.	Legitimate interest	During the term of the customer relationship and up to 2 years thereafter (unless you unsubscribe from newsletters).
Identification and contact details (name, email address, address).)	To enable you to participate in an organized event.	Agreement	During the event and potentially up to 10 years thereafter in the event of a potential (legal) dispute, and for as long as necessary to defend our rights in legal proceedings.
Identificatie- en contactgegevens (klantnummer, naam, telefoonnummer, adres), betalings- en kredietinformatie, orderhistoriek en correspondentie	To manage accounts and communicate about any recalls.	Legitimate interest	During the term of the customer relationship and up to 2 years thereafter, and potentially up to 10 years in the event of a potential (legal) dispute, and for as long as necessary to defend our rights

			in legal proceedings.
Processing if you subscribe to offers, information about products and services, or invitations to events.			
Identification and contact details (name, phone number, email address, and postal code)	To keep you informed about interesting information, products, and services.	Consent	Until you withdraw your consent
Identification and contact details (name, email address, address), optionally (if you provide it) information about your current energy consumption.	To send you promotions, offers, and invitations to events.	Consent	Until you unsubscribe from the communication or for up to a maximum of 2 years after you have given consent.
Processing to gain market insights to improve our products and/or services.			
Aggregated data related to orders, location data, purchasing behavior.	For the development, execution, and analysis of market research, market strategies, and management reports.	Legitimate interest	During the term of the market research and for up to 5 years thereafter
Aggregated data related to orders, location data, purchasing behavior.	To create statistics.	Legitimate interest	The statistics will be retained for up to 5 years after their creation.
Processing for compliance purposes			
Identification and contact details (customer number, name, phone number, address), payment and credit information, order history, correspondence, and any other data necessary for the management of our customer relationships.	For the management of our customer relationships (CRM).	Legitimate interest	During the customer relationship and for up to 2 years after its termination, unless in the event of a (legal) dispute where the relevant data may be retained for up to 10 years or as long as necessary to defend our rights during legal proceedings.

Identification and contact details (customer number, name, phone number, address), payment and credit information, order history, correspondence, and any other data necessary to monitor compliance.	To monitor and investigate compliance with our guidelines and regulations.	Legitimate interest	During the term of the agreement and potentially for up to 10 years thereafter in the event of a potential (legal) dispute and as long as necessary to defend our rights in legal proceedings.
Identification and contact details (first name, last name, email address) and the front side of the identity card (excluding the national register number and photograph).	To handle your request to exercise your rights.	Legitimate interest (to facilitate the exercise of your rights)	As long as necessary to handle your request (in the event of legal proceedings: until their conclusion).
Identification and contact details (customer number, name, phone number, address), payment and credit information, order history, invoicing, VAT and tax information, and relevant correspondence.	To comply with our accounting and tax obligations	Wettelijke verplichting	During the applicable statute of limitations (typically 7 years) and potentially for up to 10 years thereafter in the event of a potential (legal) dispute and as long as necessary to defend our rights in legal proceedings.
Identification details (customer number, first name, last name, and address), payment and credit information, order history, invoicing, and other information about you necessary to defend our rights.	To defend our rights.	Legitimate interest	During the applicable statute of limitations (typically 10 years) and as long as necessary to defend our rights in legal proceedings.
Identification details (customer number, first name, last name, and address), payment and credit information, order history, consumption data, invoicing, and other	To prevent and detect abuse or fraud.	Legitimate interest	During the customer relationship and potentially for up to 10 years in the event of a potential (legal) dispute and as long as

information necessary to prevent or detect abuse or fraud.			necessary to defend our rights in legal proceedings.
Identification details (customer number, first name, last name, and address).	To check your data against publicly available government or law enforcement sanction lists.	Legitimate interest	During the customer relationship and potentially for up to 10 years in the event of a potential (legal) dispute and as long as necessary to defend our rights in legal proceedings.

Minors

We do not intend to collect personal data from individuals under the age of 18. Visiting our website and using our products and services is reserved for individuals over the age of 18. Therefore, minors are not permitted to provide us with personal data or to submit a consent declaration.

Privacy Rights

To grant you enhanced control over the processing of your personal data, you are vested with several rights. These rights are, inter alia, enshrined in Articles 15-22 of the GDPR.

You are entitled to the following rights:

- **The right to access the personal data we process about you** (Article 15 GDPR):

You are entitled to inquire at any time whether we are processing your personal data. If we are processing your data, you have the right to access this personal data and receive additional information regarding:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients (particularly recipients in third countries);
- d) the retention period or, if that is not possible, the criteria used to determine that period;
- e) the existence of your privacy rights;
- f) the right to lodge a complaint with the supervisory authority;
- g) the source of the personal data if we obtain personal data via a third party;
- h) the existence of automated decision-making.

If we are unable to grant you access to your personal data (for example, due to legal obligations), we will provide a detailed explanation for this.

You are also entitled to obtain a free copy of the processed personal data in an understandable format. Please note that we may charge a reasonable fee to cover our administrative costs for any additional copies you request.

- **Right to Data erasure ('right to be forgotten') (Article 17 GDPR):**

In certain circumstances, you may request that we erase your personal data. Please note that your right to be forgotten is not absolute. We are entitled to retain your personal data when necessary for, among other things, the performance of the contract, compliance with a legal obligation, or the establishment, exercise, or defense of legal claims. We will provide you with further information regarding this in our response to your request.

- **Right to rectification and supplementation (Article 16 GDPR):**

If your personal data is incorrect, outdated, or incomplete, you may request that we correct these inaccuracies or incomplete data.

- **Right to data portability (Article 20 GDPR):**

You also have the right, under certain conditions, to request that the personal data you have provided to us for the performance of the contract or for which you have given consent be transferred to another data controller. To the extent technically feasible, we will transfer your personal data directly to the new controller.

- **Right to restriction of processing (Article 18 GDPR):**

If one of the following conditions applies, you may request that we restrict the processing of your personal data:

- a) you contest the accuracy of the personal data (in this case, the use of your data will be restricted for a period that allows us to verify the accuracy of the personal data);
- b) the processing of your personal data is unlawful;
- c) we no longer need your personal data for the original processing purposes, but you require it for the establishment, exercise, or defense of legal claims;
- d) pending the verification of whether our legitimate grounds override yours, you may request that the use of your personal data be restricted.

- **Right to object (Article 21 GDPR):**

You may object, on grounds relating to your particular situation, to the processing of your personal data if such processing is based on our legitimate interest or the performance of a task carried out in the public interest. In such cases, we will cease processing your personal data

unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

- **Right not to be subject to automated decision-making** (Article 22 GDPR):

You have the right not to be subject to a decision based solely on automated processing that significantly affects you or has legal consequences and is made without substantial human intervention.

There are three situations in which you cannot invoke this right:

- a) if a law permits it (for example, to prevent tax fraud);
 - b) if the decision-making is based on the explicit consent of the data subject; or
 - c) if it is necessary for the conclusion or performance of a contract (note that we always assess on a case-by-case basis whether less privacy-invasive methods exist to conclude or perform the contract).
- **Right to withdraw consent** (Article 7 GDPR):

When your personal data is processed based on your consent, you may withdraw this consent at any time upon simple request.

Exercising Your Rights

To exercise these rights, you can contact us using the contact details provided under the title "Contact."

To verify your identity, we request that you include a copy of the front side of your identity card. We ask that you make your national register number and the image on your identity card illegible. In any case, we will process your identity card details solely to verify your identity and will not store or record them in our systems.

You can exercise all these rights free of charge, unless your request is manifestly unfounded or excessive (for example, due to its repetitive nature). In such cases, we reserve the right to charge you a reasonable fee or refuse to comply with your request.

Retention of Your Personal Data

We retain your personal data for as long as necessary to achieve the intended purpose. Please note that numerous (legal) retention periods may require that personal data be stored. Where no retention obligation exists, the data is routinely deleted once the purpose for which it was collected has been achieved.

Additionally, we may retain personal data if you have given us consent or if it is possible that we

may need this data in the context of a legal claim. In the latter case, we need to use certain personal data as evidence. For this purpose, we retain certain personal data in accordance with the statutory limitation period, which can be up to thirty years; the usual limitation period for personal legal claims is ten years.

Immediately after the applicable retention period has expired, the data will be:

1. securely deleted or destroyed;
2. anonymized;
3. transferred to an archive (unless prohibited by law or an applicable records retention schedule).

Sources of Personal Data

We process personal data that you voluntarily provide to us. If additional personal data is required, you will be informed whether you are obliged to provide this data and the consequences of not providing it. Failure to provide personal data may result in our inability to deliver our products and services to you.

In particular, we may receive your personal data from the following sources:

- (i) Our affiliated companies, as defined in Article 1:20 of the Code of Companies;
- (ii) External service providers who provide us with information about the processing of your personal data through cookies on the website.

Categories of Recipients

Within our organization, we ensure that your personal data is only accessible to individuals who need it to fulfill contractual and legal obligations. For example, our employees can only access personal data to the extent necessary for the applicable purpose and the performance of their duties.

We will only disclose your personal data to third parties in accordance with legal provisions, when you have given consent, or if it is compatible with the purpose for which the data was collected. In certain cases, our employees are supported by external service providers in the performance of their tasks.

Furthermore, we do not disclose personal data to third parties unless we are required to do so by legal provisions (e.g., disclosure to government authorities such as supervisory or law enforcement agencies).

In particular, we identify the following categories of recipients:

- (i) Government or regulatory authorities when they request it in the context of compliance with a judgment or order, legislation, regulation, standard, or legal process.

- (ii) Our affiliated companies, as defined in Article 1:20 of the Code of Companies
- (iii) External service providers who provide us with information about the processing of your personal data through cookies on the website.
- (iv) External service providers who maintain our facilities.
- (v) Insurance companies.
- (vi) Credit institutions or payment service providers.
- (vii) External service providers who support us in marketing activities.
- (viii) External sales partners.
- (ix) External IT suppliers and cloud service providers.
- (x) Legal service providers.
- (xi) Accountants.
- (xii) Contact centers.
- (xiii) Forensic specialists.
- (xiv) Any other consultants.

Transfers to Third Countries Outside the European Economic Area ("EEA")

We are part of an international organization. We ensure that we only transfer your personal data to processors or controllers in third countries if we are legally authorized or obliged to do so, or if it is necessary to guarantee our services.

To the extent such transfers are necessary, we take the necessary measures to ensure that your personal data is highly protected and that all transfers of personal data outside the EEA are lawful.

Security of Your Personal Data

The security of your personal data is important to us. We have implemented reasonable and appropriate technical and organizational security measures to protect your personal data as best as possible against accidental or intentional manipulation, loss, destruction, or access by unauthorized persons. We always store your personal data in a secure location so that third parties do not have access to your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us via the internet. Any transmission of personal data is at your own risk. However, when we transfer or receive your data on our website, we always use encryption technologies that are recognized as proven standards.

Complaints?

We do our utmost to protect your personal data. If you have a complaint about the way we process your personal data, you can report it to us using our contact details provided under the title "Contact," so that we can address it as quickly as possible.

You can also lodge a complaint with the supervisory authority for data protection. The authority overseeing our organization is the Data Protection Authority, with the following contact details:

Website:

<https://www.dataprotectionauthority.be>

Contact details:

Data Protection Authority
Drukpersstraat 35, 1000 Brussels



+32 (0)2 274 48 00



+32 (0)2 274 48 35



contact@apd-gba.be

Do you have any questions?

Should you have any inquiries, please feel free to contact us via telephone, email, or postal mail using the contact details provided under the title "Contact." We will be pleased to address your questions.

Changes

To accommodate feedback or to reflect changes in our processing activities, we may amend this privacy policy occasionally. Please refer to the most recent version on our website for the latest information.