

# Privacy policy

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ALBATROS

THE COMPLIANCE BOUTIQUE FIRM

(Last update: May 13, 2024)

## 1. Introduction

Albatros Compliance SRL (herein after “Albatros”) values your privacy and cares about the way in which your personal information is treated. Our firm makes all possible efforts to guarantee full compliance with privacy legislation.

This privacy policy is intended to inform you, in a transparent manner, about the data we collect, the purpose for collecting it, the way we use it and the rights you have regarding the processing of such data.

We draw your attention to the need to read this privacy policy carefully. If you have any other questions, do not hesitate to contact us at the following address: [privacy@albatros-compliance.com](mailto:privacy@albatros-compliance.com).

Please note that we may make changes to this privacy policy from time to time, for example, to comply with new legal obligations. We encourage you to review this privacy policy periodically to be informed of how we use your personal information.

## 2. Data controller

Albatros is the controller of your personal data:

*Avenue de Boetendael 70/3, 1180, Uccle  
Belgium  
Belgian business registry (BCE) number: 0804.019.934*

If you have any questions about this privacy policy or want to exercise your rights set out in it, you can contact us:

Mail	Albatros Compliance SRL, Avenue de Boetendael 70/3, 1180 Uccle. (Belgium)
E-mail	<a href="mailto:privacy@albatros-compliance.com">privacy@albatros-compliance.com</a>

## 3. Data collected

We collect personal data including:

- identifying information, such as name, job title/position, company you work for, postal address, telephone number, mobile phone number, fax number and email address;
- financial information, such as payment-related information;

- Further business information necessarily processed in a project or client contractual relationship;
- any other data that you would voluntarily communicate to us;
- information provided by candidates when applying for a job;
- identification and background information on employees or suppliers provided by them or collected as part of our business acceptance process.

## 4. Purposes and legal basis of processing the data

We may collect personal data from you during our business, when you contact or request information from us, when you engage our services or because of your relationship with one or more of our staff and clients.

We process your data for various purposes. For each purpose, only the data relevant to the pursuit of the purpose in question are processed. Your personal data may be processed for the following purposes:

- to establish, carry out and conduct the contractual relationship with the client;
- to provide the Services;
- to manage and administrate business relationships, including processing payments, accounting, billing and collection, support services and evaluation of service providers and suppliers;
- to inform on relevant developments in European Regulations, on service offerings or on events and trainings organized by Albatros;
- to evaluate job applications;
- to perform training, performance review, employee suppliers;
- to respond to requests for information;
- for any other purpose to which you had expressly consented.

Personal data can be processed on one or more of the following legal basis:

- performance of a contract: Albatros need to collect some of your data to answer any of your requests. If you choose not to share this data with Albatros, it may render the performance of the contract impossible;
- your consent;
- compliance with legal and regulatory obligations (record keeping obligations, anti-money laundering regulations, payroll administration, etc.);
- Albatros 's legitimate interest: Albatros has a legitimate interest in interacting with you, to respond to your requests and especially to improve the Services, prevent abuse and fraud, control the regularity of the operations, exercise, defend and preserve Albatros 's rights, unless such interests are supplanted by your interests or your fundamental rights and freedoms requiring the protection of your personal data.

If the legal basis of the processing is your consent, you have the right to withdraw it at any time without prejudice to the lawfulness of the processing performed prior to withdrawal.

## 5. Recipients

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- our professional advisers and auditors including the prudential authorities and regulators;
- external third-party service providers to whom we outsource certain support services (IT service providers, accountant...).

These recipients are subject to a strict obligation of confidentiality. Please note that the aforementioned list is presented in a non-exhaustive manner and there may be other examples of situations where we need to share/transfer your personal data with/to other parties to provide our services as effectively as we can.

Your personal information will only be communicated to third parties to the extent that such information is necessary for the performance of a contract. In this case, the third parties will only communicate this information to other third parties if this is necessary for the performance of the contract or if they are obliged to do so by law and regulations.

## 6. Period of storage

We will keep your personal data no longer than necessary for the purposes for which we collected the data (see point 4).

Albatros will retain personal data where required to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled. Once this goal is achieved, all personal data is deleted or anonymised.

## 7. Security

Albatros has in place appropriate technical and organizational measures to protect your personal data from destruction, loss, modification, or any un-authorized processing. These measures for protecting personal data will regularly be adjusted to the technical developments and organizational changes.

In this respect, our partners, employees, consultants, workers, and data processors, who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

## 8. Rights / complaint

In compliance with privacy regulations and within the limits of these regulations, data subjects have the following rights regarding data processing activities by Albatros:

### — Right of access

You are entitled to request details of the information we hold about you and how we process it.

### — Right to rectification

You are entitled to have your personal data corrected if it is incomplete or inaccurate.

### — Right to erasure

You are entitled to obtain the deletion of personal data, except those which Albatros has a legal obligation to keep on record.

### — Right to limitation of processing

You are entitled to obtain limitation of processing of your personal data and, in case of restriction have the processing limited to mere storage. You may obtain a limitation of processing when you object to the processing, when you contest the accuracy of the data, when you consider that the processing is illegal.

### — Right of portability

You are entitled to receive personal data you've provided us with, in a structured, commonly used, and machine-readable format and are entitled to ask us to send this data to another data controller.

### — Right to withdraw consent

Where processing is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. We may be able to continue to process your personal information to the extent required or otherwise permitted by law.

### — Right to object

You have the right to object, on certain grounds relating to your situation, to the processing of your personal data at any time.

Any request should be addressed to Albatros:

Mail	Albatros Compliance SRL, Avenue de Boetendael 70/3, 1180 Uccle. (Belgium)
E-mail	<a href="mailto:privacy@albatros-compliance.com">privacy@albatros-compliance.com</a>

Each request should contain sufficient proof of identity. Albatros commits to examine any requests or complaints and to reply in a timely manner and in any case within one month of receipt of the application. If necessary, this period can be extended by one month, given the complexity and the number of requests.

### — Right to lodge a complaint with a supervisory authority

In any case, you are entitled to lodge a complaint with the Data Protection Authority:

Mail	Data Protection Authority, Rue de la Presse 35, 1000 Bruxelles. (Belgium)
E-mail	<a href="mailto:contact@apd-gba.be">contact@apd-gba.be</a>
Phone	+32 (0)2 274 48 00

## 9. Transfer

We generally do not transfer your personal data to third countries. We only transfer your data to a non-EU country if it provides a level of protection equivalent to what you can find in your country of residence (for more information, please consult the following [link](#)).

## 10. Minors

Our website and our services are not targeted to children under the age of 18. If you learn that your minor child has provided us with their personal data without your consent, contact us at the following address: [privacy@albatros-compliance.com](mailto:privacy@albatros-compliance.com)

## 11. Dispute

In the event of a dispute between us, Albatros commits to give priority to dialogue and openness in search of an amicable solution. You can also contact the Data Protection Authority.

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