

**PRIVACY STATEMENT**

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## 1. Who are we?

### 1.1. PXL as the controller

With this statement (hereinafter referred to as the '**Statement**'), we wish to inform you about the reasons why and the manner in which your personal data are collected and processed by Hogeschool PXL, a Flemish public-law institution of a sui generis nature with its registered office at Elfde Liniestraat 24, 3500 Hasselt, and company number 0535.878.874 (hereinafter referred to as '**we**' or '**PXL**').

We are responsible for processing the personal data that we request and use. As the controller, we take measures to ensure that you:

- remain informed of how we process your personal data;
- retain control of the personal data that we process;
- can exercise your rights in relation to your personal data.

### 1.2. Data protection officer

We have also appointed a data protection officer. This is an expert in protecting data, who provides additional safeguards to ensure that we process your personal data correctly.

You can contact the officer through the channels set out in section 11 of this Statement.

## 2. Scope of this statement

This statement does not apply to the processing of data of our students, our (prospective) employees and the participants in our studies. The aforementioned processing is governed by separate, specific privacy statements. You will be informed of these when applicable.

## 3. What data do we collect about you?

By 'personal data', we mean all information referring to a specific living natural person. Dependent on the purpose of the processing, we will process different types of personal data.

We do not intend to process sensitive personal data, such as personal data revealing racial or ethnic origin, religious or philosophical beliefs or health-related data.

## 4. Why do we need your personal data?

### 4.1. For information and commercial communication

- What does this purpose mean?

We want to be able to inform you about our activities, events, services or relevant news items. This may be at your explicit request, or if we believe that it may be of interest or benefit to you.

If you already have an existing relationship with us, you do not need to give us consent to receive direct marketing communications. We base this on our legitimate interest. If you do not have a relationship with us already, you will receive our direct marketing communications if you have given us your explicit consent to do so.

If you do not wish to receive any communications at all, you can exercise your right to object to direct marketing, as set out in section 10.2 and 10.3 below in this statement.

- What personal data do we process for this purpose?

We collect and process your name, email address, telephone number and postal address, as well as data relating to your areas of interest.

#### **4.2. Service delivery, customer relation and supplier policy**

- What does this purpose mean?

We can use your personal details to create your account as a contact, participant in events, customer or supplier in our systems and in order to fulfil our commitments to you and/or agreements with you.

- What personal data do we process for this purpose?

For this purpose, we collect and process your name, email address, phone number and postal address.

#### **4.3. Because it is necessary for us to function as an organisation**

- What does this purpose mean?

This purpose amounts to what is referred to as a 'legitimate interest'. It is indeed true that we have a few legitimate interests that form the basis for processing personal data. When processing for this purpose, we will always ensure that the balance between our legitimate interests and the impact on your privacy is not disrupted in any event.

If you nevertheless object to the processing, you can exercise your right to oppose it, as set out in section 10.3 of this statement.

Personal data is processed in several different circumstances:

- Personal data can serve as evidence (archives);
- Personal data can be used to establish, exercise, defend and safeguard our rights and those of the persons that may represent us, for example, in litigation;
- Personal data can be used for the control, (risk) management and monitoring of our organisation, such as compliance (e.g. for the prevention and investigation of money laundering and fraud, and for privacy), risk management, risk-related functions and inspection, complaint handling, internal and external audit;

- Personal data can be used to support and simplify the purchase, use and termination of services by and of our partners (customers, suppliers, etc.), to avoid you having to resubmit any data that you already completed on an earlier occasion.
- What personal data do we process for this purpose?

For this purpose, we collect and process your name, email address, phone number and postal address.

#### **4.4. Legal obligations**

We will also collect and process the personal data required in order to comply with our legal obligations.

#### **4.5. Profiling**

Your personal data will not be used for the purpose of profiling.

#### **4.6. Cookies on our website**

Our websites use cookies. Cookies are small text files that are stored on your device (for example a computer, smartphone, tablet or similar device). More information about this can be found in our cookie statement, which can be found on the websites concerned.

## **5. Do we require your consent to process your data?**

Your consent is only one possible legal ground for legitimately processing your personal data. We can only legitimately use and process your personal data if one of the following conditions is met:

- We have your explicit and voluntary consent for us to use your personal data for a specific purpose. For example, we may request your consent to contact you for direct marketing purposes, as set out in section 4.1 of this statement.
- The use of your personal data is necessary to fulfil an agreement that you entered into with us, or in order to take the necessary steps, at your request, for you to conclude an agreement with us. The processing objectives, set out in section 4.2 of this statement, are also based on the same foundation.
- The use of your personal data is necessary for the pursuit of our legitimate interests, to the extent that it outweighs your interests and rights. We base the processing that is necessary for us to work as a company on our legitimate interest, as set out in section 4.3 of this statement.
- We may be legally obliged to process specific data, and particularly to forward it to the relevant authorities.

## 6. With what other entities do we share your personal data?

Your personal data is not forwarded to other people or entities, except in the following situations:

- Only our employees who actually need access to your data to perform their work will be granted access. Those persons act under our supervision and our responsibility.
- In addition, we also engage specialist external suppliers that perform specific transactions for us, such as ICT services, solicitors and court bailiffs. Since these third parties have access to personal data in the context of the services we request of them, we have taken technical, organisational and contractual measures to guarantee that your personal data is solely processed and used for the purposes set out in point 3 of this statement.
- Your personal data will only be released to the police, intelligence services and the court if we are under a legal obligation to do so.
- If you take part in specific events that receive government funding, we are obliged to share lists of participants - which may contain personal data - with the grant channels. This is only done to provide evidence of the number of participants in the event.

## 7. Where are data stored and processed?

Your data will not normally be processed outside the EU and we will in any case ensure at all times that the legal minimum requirements and security standards are complied with.

If we anticipate that your data may be stored and processed outside the EU, we will explicitly indicate this and ensure that the same security level is used as that applicable within the EU.

## 8. For how long do we retain your personal data?

### 8.1. In general

We will retain your data only for as long as necessary for the purposes for which the data is used, as indicated in section 4 of this statement.

Since the reason for storing data can vary per type of data, the actual storage times can also vary significantly depending on the type of data, as well as depending on the processing purpose. We observe the following criteria, among others, to determine the retention periods:

- For how long is the personal data needed to provide the requested services?
- Did we establish and announce a specific retention period?
- Have we been granted consent for an extended retention period?
- Are we under a legal, contractual or comparable obligation to retain the data?

As soon as your data is no longer needed, provided we are not under a legal obligation to retain the data, we will permanently delete it, or if that is impossible, anonymise it in our systems.

Your personal data will be retained and used for as long as necessary to fulfil our legal obligations, to resolve disputes or to enforce our agreements.

## **9. How do we secure your personal data?**

Your personal data is considered strictly confidential. We will take suitable technical and organisational measures to protect the personal data provided and collected against destruction, loss, unintended changes, damage, casual or illegal access, or any other unauthorised processing of personal data.

## **10. What are your rights and how can you exercise them?**

### **10.1. Right of access, rectification, erasure, transfer of data and right to object**

#### ***10.1.1. Right to access your personal data***

You have the right to access your data at all times and to view the data of yours that we process. In that case, we will provide you with a free copy of that personal data if you request it.

#### ***10.1.2. Right to rectify your personal data***

You retain the right at all times to ask for incorrect, incomplete, inappropriate or obsolete personal data to be erased or rectified.

#### ***10.1.3. Right to withdraw your consent***

When the processing is based on your consent, you have the right to withdraw it any time.

#### ***10.1.4. Right to object to specific processing transactions***

When your personal data is processed based on a legitimate interest, you have the right to object against the processing of your personal data, in the event of reasons related to your specific circumstances.

#### ***10.1.5. Right to erasure of personal data***

You have the right to have personal data erased. On that basis, you can ask us to stop using your personal data when you no longer want a relationship with us. However, we can retain personal data required for evidentiary purposes.

Pursuant to this right to erasure, you also have the right to ask us to stop using your personal data that is processed based on your consent or our legitimate interest. On the basis of

legitimate interests, we can nevertheless continue processing your personal data after weighing your interests against ours, unless you decide to terminate your relationship with us.

#### **10.1.6. Right to transfer of personal data**

In relation to the processing of your personal data based on your consent or because it is necessary to supply the requested products or services, you can ask us to send you your personal data - in a structured, standard commonly used and machine-readable format - in order for you to store it for personal (re)use, or to forward the personal data directly to another controller, insofar this is technically feasible for us.

#### **10.1.7. Right not to be subjected to automated decision-making**

We do not subject your data to automated individual decision-making, including profiling.

### **10.2. Right to object to direct marketing**

You have the right to object to your data being processed for direct marketing purposes if you do not (or no longer) want to receive such communications from us. In that case, we will not process your data for direct marketing purposes. Your request will be carried out as soon as possible.

We draw your attention to the fact that you exercising your right to object does not prevent us from potentially contacting you for any other purpose, including for the fulfilment of any contract, in accordance with this statement.

### **10.3. How can you exercise your rights?**

In order to exercise the aforementioned rights, you can send us a written request in the following manner:

- by email: [privacy@pxl.be](mailto:privacy@pxl.be);
- in writing to the following postal address: Elfde Liniestraat 24, 3500 Hasselt, for the attention of the Data Protection Officer.

When exercising your right, please clearly indicate which right you wish to exercise and what processing activity you object to, if applicable, or which consent you wish to withdraw.

## **11. How can you submit questions or complaints?**

You can contact us using one of the following channels, if you have a question or complaint about our processing of personal data:

- by email: [privacy@pxl.be](mailto:privacy@pxl.be);
- in writing to the following postal address: Elfde Liniestraat 24, 3500 Hasselt, for the attention of the Data Protection Officer.

If you are not satisfied with our response, if you have comments on exercising your rights, or if you are of the opinion that the way we process your personal data is not in conformity with the law, you are entitled to lodge a complaint about it with the Data Protection Authority. All the relevant information can be found at <https://www.gegevensbeschermingsautoriteit.be/>.

## **12. Revisions to our statement**

We reserve the right to revise, change or add to this statement if we consider it necessary.

If this statement undergoes significant changes, the date and version number will be changed and we will also make you aware of it through the usual channels.