

PRIVACY POLICY

Version dated 1/4/2022, read the version history to see what has been changed recently.

As your trust in From Waste 2 Profit is paramount, your privacy is essential to us. Among other things, this Privacy Policy (Hereinafter: "**Privacy Policy**") applies to: **(i)** our website <https://fromwaste2profit.be> (hereinafter referred to as the "**Website**"), **(ii)** the From Waste 2 Profit platform and **(iii)** all relationships between From Waste 2 Profit and its contacts and partners.

This Privacy Policy contains information on the personal data that From Waste 2 Profit collects and how From Waste 2 Profit uses and processes these personal data.

From Waste 2 Profit wishes to emphasize that it always tries to act in accordance with the 'Privacy Legislation', namely: **(i)** the Belgian Act of July 30, 2018 on the protection of individuals with regard to the processing of personal data; **(ii)** 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; and **(iii)** other applicable special provisions on data protection.

The act of (i) visiting the Website, (ii) creating an account, (iii) applying for a grant, (iv) filling out the contact form, (v) engaging in any communication with From Waste 2 Profit and (vi) subscribing to From Waste 2 Profit's newsletter implies your explicit consent to the Privacy Policy (through communicating your personal data or opt-in) and thus to how From Waste 2 Profit collects, uses, and processes your personal data.

Read this Privacy Policy in conjunction with its version history, the legal disclaimer, general terms and conditions and cookie policy of From Waste 2 Profit.

I. Who processes your data?

The joint controllers of your personal data collected on this Website are:

1. **PROVINCIALE ONTWIKKELINGSMAATSCHAPPIJ LIMBURG**, public-law entity with legal personality recognized by the Flemish Government, having its registered office at 3500 Hasselt, Kempische Steenweg 303/101, Belgium, and with enterprise number 0881.704.066 (hereinafter referred to as "**POM Limburg**");
2. **VOKA – KAMER VAN KOOPHANDEL LIMBURG VZW**, with registered office at Gouverneur Roppesingel 51, 3500 Hasselt, Belgium, and with enterprise number 0407.589.842;
3. **NV LIMBURGS INSTITUUT VOOR ONTWIKKELING EN FINANCIERING (LIOF)**, with registered office at Wim Duisenbergplantsoen 27, 6221 SE Maastricht, The Netherlands, and with enterprise number 14604604;
4. **EFFICIENZ-AGENTUR**, with registered office at Dr.-Hammacher-Str. 49, 47119 Duisburg, Germany, and with enterprise number 170748833;
5. **ZENTRUM FÜR INNOVATION UND TECHNIK IN NRW**, with registered office at Bismarckstraße 28, 45470 Mülheim an der Ruhr, Germany, and with enterprise number 999725457;
6. **UC LIMBURG VZW**, with registered office at Agoralaan, Building B, bus 1, 3590 Diepenbeek, Belgium, and with enterprise number 0417.195.515;
7. **Z33 HUIS VOOR ACTUELE KUNST**, with registered office at Kempische Steenweg 303-101, 3500 Hasselt, Belgium, and with enterprise number 0881.704.066;
8. **STICHTING MUSEUMPLEIN LIMBURG, MUSEA VOOR AARDE, DESIGN & WETENSCHAP**, with registered office at Museumplein 2, 6461 MA Kerkrade, The Netherlands;
9. **WALLONIE DESIGN**, with registered office at 78 Rue Paradis, 4000 Liège, Belgium, and with enterprise number 0875.955.035;
10. **DIGITAL HUB AACHEN**, with registered office at Pascalstraesse 6, 50276 Aachen, Germany, and with enterprise number 307.327.768;
11. **EKLO**, with registered office at Rue Lambert Lombard 3, 4000 Liège, Belgium, and with enterprise number 0876.745.287;
12. **CHEMELOT INNOVATION AND LEARNING LABS**, with registered office at Urmonderbaan 22, 6167RD Geleen, The Netherlands, and with enterprise number 56636113;

Hereinafter jointly referred to as the "**Partners**", "**we**", or "**us**".

The Partners have appointed POM Limburg (hereinafter referred to as the "SPOC") as the general point of contact for questions or requests from data subjects. The contact details of the SPOC are included in Title XIII.

II. What types of personal data does From Waste 2 Profit process?

Personal data is that data which allows us to identify you as a person. From Waste 2 Profit processes personal data only for the purposes for which it is collected.

The following personal data may be collected and processed (non-exhaustive list):

- Contact information: first name, last name, home address, phone number and email address
- Professional information: company name, business address and billing address
- Photos and other visual material
- IP address
- All personal data submitted in the free field of the contact form on the Website
- All other personal data voluntarily transferred to From Waste 2 Profit, for example during any correspondence

From Waste 2 Profit also collects certain user and device data when you use the Website. This information is anonymous when it does not reveal your identity and may not constitute processing of personal data. Examples of this type of user and device data include information collected through cookies, pixel tags and other technologies. More information about the collection of data through cookies can be found in From Waste 2 Profit's Cookie Policy.

III. How does From Waste 2 Profit collect your personal data?

These personal data are collected at or as a result of:

- Visiting the Website and/or filling out the contact form
- Subscribing to the newsletter of From Waste 2 Profit and/or any online communication
- Participation in events
- The request for and the provision of advice by From Waste 2 Profit
- Creating an account
- Using the From Waste 2 Profit platform
- Applying for a grant for a waste stream audit
- Applying for a grant for a waste optimization project

The personal data collected by From Waste 2 Profit are thus explicitly and voluntarily provided by you (this by the notice thereof or by an opt-in).

IV. What is the legal basis for processing your personal data?

Processing is carried out on the following legal grounds, as relevant and as set out in Section V:

- ✓ You have consented to the processing of your personal data for one or more specific purposes
- ✓ The processing is necessary for the performance of the contract with From Waste 2 Profit or in order to take action at your request prior to the conclusion of a contract
- ✓ The processing is necessary for compliance with a legal obligation imposed on From Waste 2 Profit
- ✓ The processing is necessary for the purposes of protecting the legitimate interests of From Waste 2 Profit or of a third party, except where your interests or fundamental rights and your fundamental freedoms which require the protection of personal data outweigh those interests (in particular where you are a minor):
 - B2B marketing activities;
 - Use of necessary and functional cookies on the Website (for more information, see Cookie Policy)
 - Responding to advisory, subsidy and other inquiries (whether or not made via the contact form on the Website)

V. From Waste 2 Profit's processing activities

A. General

Providing certain personal data is sometimes a prerequisite to benefit from certain services (for example, to gain access to certain parts of the Website, to subscribe to newsletters, to participate in certain activities and events, to be able to receive certain goods and services by way of delivery). This policy also specifies which data are mandatory and which are optional.

If From Waste 2 Profit's legitimate interest is the legal basis for processing, as shown in the tables below, From Waste 2 Profit will always:

- (i) assess the necessity of the processing activity in relation to the purpose of the processing (proportionality test); and
- (ii) assess whether you, the data subject, could reasonably expect the specific processing operation to take place, so we can estimate the possible effects of the processing operation on your fundamental rights and freedoms.

From Waste 2 Profit thus always strives to minimize the impact on your fundamental rights and freedoms as much as possible. We warrant that we will process your personal data on the basis of a legitimate interest only if we are absolutely sure that a balance can be found between your rights and freedoms and our interests. If a balance cannot be guaranteed, From Waste 2 Profit:

- (i) will no longer process your personal data in that specific situation (for that specific purpose); or
- (ii) will rely on another legal ground to process your personal data (e.g. consent).

B. Processing activities concerning the use of the Website

COLLECTION METHOD	PERSONAL DATA	PURPOSE	LEGAL BASIS	RETENTION PERIOD
Filling out the contact form	Name, email address, voluntarily provided personal data	Answering questions	Explicit consent	Once the question was addressed and up to 1 year after receipt.
Grant application	Name, first name, email address, phone number of contact person, company	Handling of grant applications and communication	Explicit consent	Throughout the duration of the grant application, as well as the execution of the project for which the grant was awarded and for three years after the completion of the project cf. the Interreg obligations.
Creating an account / using the platform	Name, first name, email address, phone number, company, business address, sector, waste streams	Access to the From Waste 2 Profit platform for mapping and matching waste streams	Explicit consent	As long as account was not cancelled/terminated and up to three years after the completion of the project cf. the obligations of Interreg.
Cookies on the Website (see Cookiepolicy)	IP-address	Optimizing and personalizing your browsing experience	Explicit consent (consent can be withdrawn at any time for non-essential cookies)	Depends on the type of cookie. Session cookies are deleted immediately after the browser session; other cookies are always placed for a specific, proportional period.
Subscription to newsletter	Name, first name, phone/mobile phone number, email address, company	Through the sending of newsletters, invitations or through any other form of online communication, From Waste 2 Profit will inform you of news and activities related to our operation	Explicit consent	1 year

(*) For more information on the use of cookies, we refer to the cookie policy available on our Website.

From Waste 2 Profit also automatically collects anonymous information regarding your use of the Website. For example, From Waste 2 Profit will automatically log which parts of the Website you visit, which web browser you use, and which

website you visited when you accessed the Website. Although we cannot identify you on the basis of these data, they allow From Waste 2 Profit to compile statistics on the use of the Website.

C. From Waste 2 Profit's other processing activities

COLLECTION METHOD	PERSONAL DATA	PURPOSE	LEGAL BASIS	RETENTION PERIOD
CRM	Name, first name, email address and phone number contact person, company, address, billing information	Manage relationships with participating parties and partners.	Execution of the agreement	Up to three years after the completion of the Project cf. the obligations of Interreg.
Communication with (future) partners	Name, first name, email address, phone number of contact person	Correspondence via phone or email, whether to answer questions or not.	Execution of the agreement with From Waste 2 Profit or to respond to a question/request prior to the conclusion of an agreement	As long as From Waste 2 Profit and the partner have a business relationship + 1 year after its termination and 1 year if no relationship has been established
Invoicing	Name, first name, email address and phone number contact person, company, address	Invoicing	Execution of the agreement	7 years (minimum statutory retention period)
Photo and visual material	Photos, audiovisual images	<p>On occasions/activities, From Waste 2 Profit may take visual material, such as photographs and films. We use these photos and films for promotional purposes in order to make our operation more widely known.</p> <p>In addition, photo and image material can be provided to other local authorities and partners, but this is done under strict conditions and only for purposes of our own promotion to make our operation better known.</p>	Explicit consent	Until the end of the From Waste 2 Profit project or until the consent is withdrawn
Events	Name, first name, email address, phone number of contact person, company/organization	<p>From Waste 2 Profit regularly organizes events such as information sessions, and networking events. In order to organize these events, we need your data.</p> <p>We use your personal data in this context to invite you to these activities, usually via your e-mail address but possibly also in writing.</p>	Explicit consent	Up to 1 month after the end of the event

VI. Transfer to third parties

From Waste 2 Profit will not disclose your personal data to third parties, except when necessary for the implementation of the purposes described above. In this context, your personal data may be disclosed to other government agencies, project partners and external IT providers.

If From Waste 2 Profit has to disclose your personal data to third parties for this purpose, the third party concerned must use your personal data in accordance with the provisions of this Privacy Policy and the data processing or transfer agreement that will be concluded with this party, if applicable.

As an interregional project, From Waste 2 Profit may disclose your personal data to project partners as well as to public authorities or administrations, where we are required to do so. Partners of From Waste 2 Profit are also part of the European Union which means that they will also apply the GDPR in accordance with the joint controller agreement of the partners.

Notwithstanding the foregoing, From Waste 2 Profit may disclose your personal data to the competent authorities **(i)** when From Waste 2 Profit is required to do so by law or in the context of a current or future judicial proceeding and **(ii)** in order to safeguard and defend its rights.

In all other cases, From Waste 2 Profit will not sell, rent or transfer your personal data to third parties, unless it **(i)** has obtained your consent and **(ii)** has entered into a data processing/data transfer agreement with the relevant third party, which contains the necessary guarantees regarding confidentiality and privacy compliant handling of your personal data.

VII. Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to a recipient residing or having its corporate domicile in a country not covered by an adequacy decision issued by the European Commission will be governed by the provisions of a data transfer agreement, which will contain:

- (i)** the standard contractual clauses as stipulated in the European Commission Decision of June 4, 2021 (Decision 2021/915) or any amended version thereof; and/or
- (ii)** binding corporate rules. If the standard contractual clauses are used in this case, the recipient of the personal data/From Waste 2 Profit's processor in the third country must guarantee to From Waste 2 Profit that an adequate level of privacy compliance is ensured in the third party's country; and/or
- (iii)** provide appropriate guarantees by any other mechanism under the Privacy Legislation or any other regulation governing the processing of personal data.

VIII. Retention of personal data

Unless a longer retention period is required or justified (i) by law or (ii) through complying with any other statutory obligation, From Waste 2 Profit will retain your personal data only for the period needed to achieve and fulfill the purposes as described in this Privacy Statement under Title V.

IX. Your privacy rights

You have these privacy rights in relation to the processing of your personal data:

- ✓ **Right to access your personal data**
You may always access and inspect your personal data that From Waste 2 Profit has processed. From Waste 2 Profit will provide a copy of these personal data on your request.
- ✓ **Right to rectify, supplement, or update your personal data**
You may always have incorrect, incomplete, inappropriate, or outdated personal data removed or rectified.
- ✓ **Right to erasure of your personal data ('right to be forgotten')**
In this context, From Waste 2 Profit wishes to point out that certain services will no longer be accessible or can no longer be provided if you delete or have certain necessary personal data deleted.
- ✓ **Right to restrict the processing of your personal data**
You may restrict the processing of your personal data if:
 - you dispute the accuracy of the data, for a period that allows From Waste 2 Profit to verify the accuracy;

- the processing is unlawful, and you oppose the erasure of your personal data and request the restriction of their use instead;
 - From Waste 2 Profit no longer needs your personal data for processing purposes, but still needs them to institute, exercise, or substantiate legal claims;
 - you have objected to a processing operation and are waiting for an answer on whether your objection is well-founded.
- ✓ **Right to portability of your personal data**
You may obtain the personal data that From Waste 2 Profit has processed in a structured, commonly used, and digital format so they can be saved for personal use or reuse, or to send them directly to another controller. This right applies insofar as it is technically possible for the controller to do this.
- ✓ **Right to object to/oppose the further processing of personal data**
- You may always object to the processing of your personal data for reasons relating to your specific situation.
 - The controller will immediately cease processing your personal data, unless it puts forward compelling legitimate grounds for the processing that override your interests, rights, and freedoms or that relate to instituting, exercising, or substantiating legal claims.

If you wish to exercise your privacy rights, please contact privacy@pomlimburg.be (see SPOC contact information under Title XIII).

If there is reasonable doubt about your identity, From Waste 2 Profit has the right to request the front of your identity card for identification before being able to answer your question or request. However, From Waste 2 Profit explicitly acknowledges that it will not systematically request the identity card of the data subject within this framework and that it only uses the evidence to establish whether you are actually the data subject whose personal data are being processed. As soon as both parties are satisfied with the answer to your question, From Waste 2 Profit will destroy the evidence.

In principle, you can exercise these rights free of charge using the above form, except when the controller considers the request to be manifestly unfounded or excessive (for example, if you make repeated requests).

If and insofar as permitted under the applicable law, From Waste 2 Profit may process your contact data for direct marketing purposes. If you no longer wish to receive newsletters or information about From Waste 2 Profit's products or services, you can always unsubscribe by clicking the 'unsubscribe' button at the bottom of each email.

For photos and footage, please contact the organizer or photographer at that time and express your desire not to be filmed or photographed. If a photo or film is published on which you are recognizable and you wish to cancel this publication, please send your request by e-mail to privacy@pomlimburg.be.

X. Security of personal data

From Waste 2 Profit undertakes to implement appropriate and reasonable physical, technological, and organizational security measures to prevent (i) unauthorized or unlawful access to your personal data, and (ii) the loss, misuse, or alteration of your personal data.

From Waste 2 Profit will keep all personal data collected on-site and in the cloud with data centers in the EU. Despite (i) From Waste 2 Profit's security policy, (ii) the controls it performs, and (iii) the actions it takes in this regard, an infallible level of security cannot be guaranteed. As no method of transmission or transfer via the internet or any electronic storage method is 100% secure, From Waste 2 Profit cannot guarantee absolute security in this context.

XI. Updates to Privacy Policy

From Waste 2 Profit may update this Privacy Policy by posting a new version on the Website. We therefore strongly recommend that you regularly consult the Website and the relevant page of the Privacy Policy to ensure that you are aware of any amendments.

The most recent version of the Privacy Statement is always available on the Website. Any update and in accordance with the moment of change will be explained and displayed in the version history of the Privacy Statement.

XII. Links to other websites

The Website may contain hyperlinks to other websites. When you click on one of these links, you could be directed to another website or internet source that might collect information about you intentionally or through cookies or other technologies. From Waste 2 Profit has no responsibility, liability, or ability to control these other websites or internet sources, or their collection, use, and dissemination of your personal data. You should check the privacy policies of these other websites and internet resources to determine whether they comply with the Privacy Legislation.

XIII. Contacting From Waste 2 Profit

If you have questions about the Privacy Policy or about how From Waste 2 Profits collects, uses, or processes your personal data, contact us:

- Via e-mail: privacy@pomlimburg.be
- By post: POM Limburg, Corda Campus, Building 6B, Kempische Steenweg 303/bus 101, 3500 Hasselt, Belgium

If you are dissatisfied with how From Waste 2 Profit deals with these questions or comments, or if you have concerns about how From Waste 2 Profits collects, uses, or processes your data, you may lodge a complaint with the competent supervisory authority. This may be the supervisory authority of (i) your usual place of residence, (ii) your place of work, or (iii) the location of the alleged breach of the Privacy Legislation.

Contact details of the Belgian Data Protection Authority:
Data Protection Authority
Rue de la Presse/Drukpersstraat 35, 1000 Brussels, Belgium
Tel.: +32 (0)2/ 274 48 00
Email: contact@apd-gba.be