



**BLUEIT**

# PRIVACY NOTICE

**POLICY**

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# INTRODUCTION

Welcome @ BlueIT. We take your privacy seriously and are committed to protecting your personal information. This privacy notice explains how we collect, use and protect your data.

BlueIT wants to focus on the protection of personal data in accordance with the rules elaborated in the GDPR (General Data Protection Regulation) or – in Dutch – the GDPR (General Data Protection Regulation) in accordance with European Regulation 2016/679 that applies from 25 May 2018 and the other applicable legislation relating to the protection of personal data.

## POLICY

### PURPOSE

The purpose of a privacy notice is to provide transparency to users about how their personal data is handled by an organization. Specifically, a privacy notice has the following purposes:

- “ **Inform:** To make it clear to users what data is being collected, why this data is being collected, and how it is being used.
- “ **Protect:** Reassure users that their data is kept safe and protected from unauthorized access.
- “ **Explain Rights:** Inform Users of their rights regarding their personal data, such as the right to access, rectification, deletion, and objection.
- “ **Compliance:** Comply with legal requirements and regulations, such as the General Data Protection Regulation (GDPR) in the EU.

### SCOPE

The scope of a privacy notice covers all aspects of data processing within an organisation. This means that the privacy notice must clarify what types of personal data are collected, how and why this data is processed, and what measures are taken to protect the data.

Specifically, the scope includes:

- “ Data collection: What data is collected (e.g. name, email address, IP address).
- “ Purposes of processing: Why the data is collected and how it is used (e.g. for marketing, customer service, legal obligations).
- “ Storage and security: How the data is stored and what security measures are taken to protect it.
- “ Data sharing:
  - With whom the data is shared (e.g. third parties, partners) and under what conditions.
  - Sub-processor = Visma IonProjects: the data that is put into the ERP system used by BlueIT and processed by them in an aggregated and anonymized format.  
Goal: analyses of their services.
- “ Users' rights: What rights users have in relation to their data (e.g. right of access, rectification, deletion).
- “ Contact Information: How users can contact the organization with questions or to exercise their rights.

## PROCEDURE

The policy includes the following topics:

- “ We take good care of your personal data
- “ We knowingly process your personal data
- “ Purpose and lawfulness
- “ Retention periods
- “ Additional information regarding recipients of personal data
- “ Security of personal data
- “ Our business card with all the necessary information
- “ We listen to your questions

## WE TAKE GOOD CARE OF YOUR PERSONAL DATA

BlueIT is committed to treating your personal data according to the basic principles of processing.

- “ Clarity
- “ Purpose limitation
- “ Correctness
- “ Confidentiality, Integrity, and Availability (CIA)

## WE PROCESS YOUR PERSONAL DATA CONSCIOUSLY

Your personal data will only be processed if this is done in a lawful manner. On the one hand, processing is necessary for one of the following reasons:

- “ Contract execution
- “ Legal notice
- “ Legitimate interest

On the other hand, this can be done after your consent. You always have the right to withdraw this consent.

For each purpose, BlueIT indicates which basis applies.

## PURPOSE AND LEGALITY

BlueIT will only process the necessary personal data in the context of the following purposes:

- “ **Customer management**, e.g.:
  - Managing a customer relationship, drawing up quotations and executing one or more agreements (e.g. a purchase, etc.): contractual necessity
  - Accounting processing, etc.: legal obligation
  - Newsletter and other marketing: legitimate interest
- “ **Supplier management**, e.g.:
  - Managing a supplier relationship, processing quotations and executing one or more agreements: contractual necessity
  - Accounting processing, etc.: legal obligation
- “ **Compliance with legal obligations on our part**, e.g. tax and social law obligations: legal obligation
- “ **Dispute management**: Legitimate interest i.e. the safeguarding of financial interests

“ **Direct marketing**, i.e. BlueIT likes to keep you informed and sends a mailing to customers (legitimate interest, i.e. the freedom of enterprise) and prospects (consent) at regular intervals.

“ **Prospects / suspects**, e.g.:

The collection and processing of contact details and other relevant information of prospects with the purpose of offering BlueIT's services and/or products, establishing a potential customer relationship, and carrying out targeted marketing and sales activities.

“ **Former employees**

The retention and processing of personal data of former employees for the purpose of complying with legal obligations, maintaining accurate employment records, handling post-employment matters such as references or pension administration, and, where applicable, maintaining alumni relations.

“ **Applicants:**

The collection and processing of personal data of applicants for the purpose of assessing their suitability for a position within BlueIT, conducting correspondence related to the recruitment process, and, where applicable, retaining data for future job opportunities with the applicant's consent.

If the basis is a contractual necessity or legal obligation, the personal data must be provided to enable the performance of the agreement, or to comply with a legal obligation. In the absence of the required information, the relationship cannot be continued.

BlueIT secures all data appropriately. As a result, we have taken the necessary technical and organizational measures: BlueIT operates according to the ISO 27001 standard. (= the international standard for Information Security), and the Statement of Applicability (mandatory checklist regarding Information Security for the ISO 27001 standard) and provides, among other things, the following to achieve this:

- “ The necessary physical safeguards
- “ Regular hardware and software updates
- “ Backups
- “ Comprehensive usage management including adequate password management
- “ Secure Internet Connections
- “ Use of antivirus software, firewall,...

## RETENTION PERIODS

The personal data will be kept for the following period:

- “ **Customer management:** 10 years after the end of the contractual relationship
- “ **Supplier management:** 10 years after the end of the contractual relationship
- “ **Compliance with legal obligations in our mind:** legal retention period
- “ **Dispute management:** for the period necessary to settle the dispute definitively
- “ **Prospects / suspects:** 2 years after the last meaningful contact with the data subject
- “ **Former employees:** 5 years after the end of employment
- “ **Applicants:**
  - Rejection of candidates: personal data will be retained during the application process and in any case for up to 2 months after the completion of the recruitment and election process. Up to 2 months after completing the selection
  - Recruitment reserve: For the creation of our recruitment reserve, we keep the applicant's data for 1 year. The applicant gives their consent when they apply for a vacant position.

## ADDITIONAL INFORMATION REGARDING RECIPIENTS OF PERSONAL DATA

BlueIT may share your personal data with the following **recipients**:

- “ You and, as the case may be, (a) your employer or some of your employees and (b) professional advisers appointed by you;
- “ Suppliers, in the context of an agreement to be performed, e.g. direct supply
- “ Banks, insurance companies and brokers, within the context of your relationship with these parties;
- “ Public services in the context of legal obligations;  
Our professional advisers, lawyers and bailiffs to the extent necessary for their assistance;

Technical processors, such as hosting of websites, files and files, subject to implementation of the necessary processing agreements. The list of technical processors will be delivered on demand.

## SECURITY OF PERSONAL DATA

The personal data processed by BlueIT will not be passed on to third parties, with the exception of the recipients as described above. This third party must process the personal data provided to him in accordance with the GDPR legislation (e.g. adequately secure this data,...) BlueIT also wants to make you aware that no system can be 100% secure. Moreover, information security also depends on you. You must also properly secure your own information systems and keep any account details confidential.

## TRANSFER OF PERSONAL DATA

The personal data processed by BlueIT is not transferred to countries outside the European Economic Area.

## OUR BUSINESS CARD WITH ALL THE NECESSARY INFORMATION

BlueIT is the controller for the purposes described above. If you have any questions, please contact us:

Data Controller	BlueIT Development BV	BlueIT Solutions BV	BlueIT Services BV	BlueIT On The Spot BV
<b>Registered office</b>	Pallieterdreef 53 2280 Grobbendonk Belgium	Pallieterdreef 53 2280 Grobbendonk Belgium	Pallieterdreef 53 2280 Grobbendonk Belgium	Pallieterdreef 53 2280 Grobbendonk Belgium
<b>Phone</b>	+32 (0)3 295 17 00	+32 (0)3 295 17 00	+32 (0)3 295 17 00	+32 (0)3 295 17 00
<b>Company nr.</b>	0844.793.091	0817.964.376	0536.687.934	0537.366.736
<b>GDPR Responsible</b>	<a href="mailto:intel@blueit.be">intel@blueit.be</a>	<a href="mailto:intel@blueit.be">intel@blueit.be</a>	<a href="mailto:intel@blueit.be">intel@blueit.be</a>	<a href="mailto:intel@blueit.be">intel@blueit.be</a>

In our case, the supervisory authority is the Belgian data authority. You can always contact them if you wish.

**Supervisory authority:** Gegevensbeschermingsautoriteit – L'Autorité de protection des données

**Address:** Rue de la Presse 35, 1000 Brussels

**Phone:** +32 (0)2 274 48 00

**Email:** [contact@apd-gba.be](mailto:contact@apd-gba.be)

**Website:** [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)

In some cases, BlueIT is also a processor of personal data for which BlueIT customers are the controller. In that case, BlueIT is the processor and carries out assignments in the context of an agreement with that customer. Are you in that case? Please contact us to get our Data Processing Agreement.



## WE LISTEN TO YOUR QUESTIONS

As a controller, you can always contact BlueIT for the following:

- “ Access
- “ Rectification
- “ Erasure
- “ Restriction
- “ Portability
- “ Objection
- “ Refusal of profiling

You have the right to access, correct, erase, restrict processing, transfer your personal data to another controller, object to the processing and refuse automatic decision-making, including profiling.

You also have the right to lodge a complaint with the Belgian data authority. (see above)

In order to enable a quick amicable resolution of disputes, we kindly ask you to contact us first.

The above rights are subject to a number of legal conditions and limitations. If you have any questions about this, please feel free to contact us first.

This Privacy Notice was last amended on 26/06/2025, but may be amended in the future. Therefore, please consult this document on a regular basis. Any significant changes will be indicated on our website.

# VERSION HISTORY

TEMPLATE REFERENCE 003					
VERSION	MODIFIED BY	DATE	SUMMARY	VERIFIED BY	DATE
001	Kimberly Huysman	12-07-'22	NEW DOCUMENT	Thomas Mariën	12-07-'22
002	Kimberly Huysman	23-04-'25	Update in new ISO template	Thomas Mariën	23-04-'25
003	Kimberly Huysman	26-06-'25	Update Purpose & legality + retention periods	Thomas Mariën	26-06-'25