

GENERAL PRIVACY POLICY

This General Privacy Policy (the "**Policy**") applies to all present and future members of the Belgian Venture Capital & Private Equity Association VZW/ASBL ("**BVA**") and all present and future attendees of events, workshops and courses organized by BVA or external events promoted by the BVA.

Please make sure you communicate this and make it available to all your employees and other representatives, where relevant.

The purpose of the Policy is to describe (i) the conditions under which BVA as data controller (i.e. the legal entity that decides on the purposes and means of personal data processing) processes personal data (i.e. data relating to an identified or identifiable individual, such as yourself and your relevant employees and other representatives) and (ii) your rights and obligations in relation to such processing.

The above processing is subject to EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of data and repealing Directive 95/46/EC (the "**GDPR**").

1. Which information does the BVA collect?

In general, the BVA collects general identification information about all individuals with whom the BVA interacts, such as the name, title, position, company name, professional and/or private email and/or postal address, fixed and/or mobile phone number as well as any information provided directly by such persons (e.g. by email or through providing business cards).

In addition, the BVA collects the following information about the specific categories of individuals listed below.

If you are a member of the BVA or an attendee at an event or meeting organised by the BVA, the BVA will collect the following categories of personal data relating to you, as part of its activities:

- your identification data (as listed above and supplemented by your IP address, as the case may be);
- your education and experience;
- your profession and function;
- your photograph;
- your membership status;
- your participation in our events; and
- where applicable, your participation in our working groups and committees (including the fact of your attendance at related meetings and any personal information required by public or official authorities (e.g. date of birth) to facilitate such attendance) and your involvement in any document they produce.

The BVA may also process so-called sensitive personal data about yourself (i.e. your dietary requirements which may infer health-related and/or religious data).

Such processing shall be made in compliance with the applicable data protection law and include the information you voluntarily provide when answering questions in our registration form or otherwise as well as any information we receive or purchase from third parties.

If you provide the BVA with the contact details of another person in your organisation, you acknowledge having informed this person beforehand of this Policy and, where required, having obtained the consent of this person for this communication.

2. Logs and Cookies

The BVA is collecting and processing information regarding the browsing by visitors on its site www.bva.be (the "Site") via its logging system.

In addition, the BVA uses cookies on the Site. A cookie is a text file which may be placed on the computer of the user when visiting the Site. It contains information that is collected from such computer and sent back to the Site on each subsequent visit so as to remember actions and preferences of the user over time.

The BVA uses the following types of cookies:

- Strictly necessary cookies - Some of the cookies on the Site are essential in order to enable you to move around the Site and use its features. This includes accessing secured areas of the Site (relying on your user ID and password upon login to our Site).
- Performance cookies - Some of the cookies on the Site collect information about how visitors use the Site, for instance which pages visitors go to most often, and if they get error messages from webpages. This is the case for third party analytics cookies (provided by Google), including the User-ID feature which enables the BVA to generate a unique ID assigned to a visitor of the Sites.

You may block, delete or disable cookies by (de)activating the relevant settings on your browser. In doing so however, you may no longer be able to access all or parts of the Site. If you use multiple devices or browsers, you will need to reproduce the above process on each of them.

The BVA only uses this information for specific purposes based on its legitimate interest, which consists in administering its website and in preventing fraud and abuse thereof, and in particular: to compile statistical data on the use of the Site;

(i) to track how users navigate through the Site;

(ii) to enable the BVA to evaluate and improve the Site and tailor it to the visitors' needs;

and

(iii) to monitor and prevent fraud, infringement and other potential misuse of our website

3. What does the BVA do with this information?

3.1. Present and future members

The BVA only handles personal data relating to its members (present and future) for specific purposes based on your consent or our legitimate interest, which is to manage the relationship with you, and in particular for:

- Membership administration (including sending you requests for information for research purposes);
- Networking and sharing the information with other members or official and public bodies;
- Making these data available on the BVA website; and
- Direct marketing purposes (including emailing of information about our activities).

3.2. Events, workshops and courses in the framework of BVA's activities

The BVA only handles personal data relating to present and future attendees of events, workshops and courses, provided for specific purposes based on your consent or our legitimate interest, and in particular for:

- The organisation of these events, workshops and courses;
- Attendees' administration;
- Networking;
- Administration of mobile applications; and
- Direct marketing purposes (including emailing of information about our activities).

4. BVA's undertaking when handling your personal data

Taking into account the state of the art of the technology, the costs of its implementation and the nature of the personal data it processes about you, the BVA has implemented appropriate technical and organisational measures to ensure a level of security and confidentiality to your personal data so as to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, the BVA:

- Only collects and processes personal data which is adequate, relevant and not excessive as required to meet the above purposes;
- Ensures your personal data is not kept longer than necessary; unless otherwise legally required, your personal data will be stored for a period not exceeding 5 years

from the end of your membership or your latest participation to one of our events, workshops or courses;

- Ensures that your personal data remains up to date and accurate. For that purpose, BVA may request you to review and update the personal data it holds about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances to ensure your personal data are kept up-to-date; and
- May process any sensitive data about yourself (including dietary requirements which may infer health-related and religious data) you voluntarily provide in compliance with applicable data protection rules and strictly as required for the relevant purposes listed under section 2 above, the data being accessed and processed solely by the personnel in charge of these events, workshops and courses, under the responsibility of the Secretary-General of BVA who is subject to an obligation of confidentiality.

5. Access and transfer of personal data

The BVA may disclose your personal data only to the following specific categories of recipients: our IT and personal assistance service providers, event organisers and sponsors. Whenever required, such data may also have to be communicated to relevant public authorities in Belgium and abroad as they would so require.

By registering to an event, workshop or course organised by the BVA, you agree that the BVA shares your contact details with the other attendees.

6. Your rights in respect to your personal data

You may exercise the following rights with respect to your personal data under the conditions and within the limits set forth in the applicable data protection law:

- To access it and if you believe that any information relating to you is incorrect, incomplete or not up to date, to request its correction;
- To request its erasure or the restriction of its processing, or to object to such processing; and
- To request its portability, i.e. by obtaining that the personal data you have provided to BVA to be returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format.

You also have the right to withdraw your consent at any time regarding any of the above data processing, without affecting the lawfulness of our processing based on your consent before such withdrawal.

You can exercise the above rights by sending an email to BVA at info@bva.be or by sending a dated and signed letter addressed to Pierre Demaerel (Secretary-General – BVA, Havenlaan 86, 1000 Brussels) with a scan of your identity card for identification purpose.

If you are not satisfied with the way we process your personal data, please let us know and we will investigate your concern using the above communication means. If you are not satisfied with our response, you have the right to make a complaint to the competent data protection authority, the Belgian Privacy Commission (<https://www.Privacycommission.be>).

Changes or additions to the processing of your personal data as described in this Policy, such as other purposes for processing your personal data or new recipients of such data, may be notified to you through amendments to this Policy or through individual notice.