

PRIVACY STATEMENT

Identification

The BETWEENPROS website is managed by the S.P.R.L. NEOS COSMOS (hereafter NEOS COSMOS), a company specialised in the operation and management of a Platform dedicated to real estate professionals.

NEWS COSMOS

Registered office: Rue Royale 163, 1210 Brussels

VAT : BE 0458 043 304

Phone : 0475 41 36 15

E-mail: info@betweenpros.com

Within the framework of its activities, NEOS COSMOS processes personal data. As responsible for the processing of these data, NEOS COSMOS undertakes to respect the Privacy Charter below. It is completed by the General Conditions of Use of the BETWEENPROS Platform.

Table of Contents :

CHARTRE VIE PRIVÉE	1
Identification	1
Table des matières :	1
Article 1.	2
Why do we process your data ?	2
Article 2.	2
Article 3.	3
Article 4.	4
Article 5. What are your rights ?	4
Article 6.	5
Article 7.	5
Article 8.	5
Article 9.	6

Article 1. Definitions

- " Autorité de protection des données (APD) ": Belgian independent supervisory authority, created by the law of 3 December 2017 and defined by Article 4. 22) of the RGPD.
- " Donnée à caractère personnel ": Any information as defined in Article 4. 1) of the GDMP.
- " Nous ": References to " nous ", " nos " or " notre " in this Privacy Policy refer to NEOS COSMOS.
- " Règlement European Commission on the protection of données (RGPD) ": Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable from 25 May 2018.
- " Responsable from traitement ": The natural or legal person, public authority, service or other body as defined in Article 4(7) of the RGPD.
- " Sous-traitant ": The natural or legal person, public authority, service or other body as defined in Article 4(8) of the GDMP.
- " Traitement ": Any operation or set of operations as defined by article 4 2) of the GDMP.
- " Vous ": References to " vous ", " vos " or " votre ", in this Privacy Policy refer to any person concerned by the processing of personal data for which NEOS COSMOS is responsible.

Why do we treat your données ?

Article 2. Essentially in order to manage our contractual relationship and meet our legal obligations

The data you provide us with will be processed for the following **purposes**:

- Carry out our contractual mission and communicate with you about it.
- Proceed with billing (contact and financial data), or notification of a change in the Contract or the Privacy Policy (including new purposes).

These data are therefore **indispensable for the** execution of our contract. Without them, we cannot carry out our mission. Your data may also be collected and stored in order to meet **our** legal, tax and accounting **obligations**.

Data belonging to the following **categories** may be collected and processed:

- Identity data (gender, surname, first name, e-mail address, address, telephone number, mobile phone number, bank details, VAT number)
- Computer identity data (IP address and geolocation, host name, web browser)
- Online personal account identifiers (login, password)
- Identifications of your computer servers (IP address, host name)

Their communication of data to our employees, subsidiaries, suppliers, external service providers or consultants may be necessary for the execution of our mission.

These data are transmitted to the tax and social administration, our social secretariat and our accountant. They could be passed on to our council or to a bailiff in the event of legal recovery.

The data you entrust us with is **kept for 10 years** after the end of the contract, mainly for tax and accounting purposes, but also for liability purposes. In general, the data will be kept for a period of time in accordance with our legal and regulatory obligations.

You agree to the possible transfer of data outside the European Union.

In such cases of transfers, we naturally ensure that the recipients are obliged to comply with the same data protection standards as in the EU, either by means of appropriate contractual clauses or by their adherence to the principles of [Privacy Shield](#). You can obtain a copy of these guarantees on request.

Article 3. We also process certain data in order to provide you with relevant commercial information.

NEOS COSMOS has a **legitimate interest in** promoting the products and services it offers to its Users. As a result, you may receive emails, announcements or notifications with marketing information about new products and services that we or our partners offer. Your contact data may be forwarded to an electronic mailing service. We keep your data for this purpose until you ask us to stop.

Data belonging to the following categories may be collected and processed:

- Identity data (gender, surname, first name, e-mail address, address, telephone number, bank details, VAT number)
- Computer identity data (IP address and geolocation, host name, web browser)
- Online personal account identifiers (login, password)

Identifications of your computer servers (IP address, host name)

Their communication to our employees, subsidiaries, suppliers, external service providers or consultants may be necessary for this purpose.

The data you entrust us with for this purpose is **kept for 5 years** after the end of the contract. Data necessary for the execution of the contract may be kept longer, but will not be used for direct marketing purposes beyond 5 years. You can inform us at any time that you **no longer wish to receive an announcement**. Just send us an email at info@betweenpros.com.

You agree to the possible transfer of data **outside the European Union**. In such cases of transfers, we naturally ensure that the recipients are obliged to comply with the same data protection standards as in the EU, either by means of appropriate contractual clauses or by their adherence to the principles of [Privacy Shield](#). You can obtain a copy of these guarantees on request.

Article 4. Location of data

Your data may be stored on servers located within or outside the EU. They will not be transferred to a country that does not offer an adequate level of protection.

Article 5. What is your droits ?

- **Right to Information:** This right is exercised through the information provided in this document. If among the data processed are the data of your staff, you are strongly advised to make them aware of this document. If you have any questions, please contact info@betweenpros.com.
- **Right of access and rectification:** you have the right to access your data and to have them rectified if necessary.
- **Right of opposition:** you may object to the processing of your data that we carry out and that we justify by our legitimate interest (e.g. direct marketing).
- **Right to withdraw your consent :** Where data is processed with your consent, you may at any time reconsider this decision and withdraw your consent. However, treatments that have already been carried out in the past with your consent cannot be questioned. You won't be able to challenge them anymore.
- **Right of deletion :** You may obtain the erasure of your data or the restriction of the processing under the conditions laid down in Articles 17 and 18 of the General Data Protection Regulation.
- **Right to portability of your data :** The data you have provided us with may be communicated to you or passed on to another controller in electronic format.

Article 6. Responsibility

Our responsibility for the processing of your data is regulated in the General Conditions of Use of the BETWEENPROS Platform.

These Terms and Conditions of Use are accessible through this [link](#).

Article 7. Contact data

The person responsible for processing your NEOS COSMOS data is at your disposal for any questions and, with proof of your identity, for any request relating to the rights set out above. Please contact info@betweenpros.com or 0475 41 36 15 during opening hours.

If you require further information, or if you wish to lodge a complaint, you can contact the Data Protection Authority (Rue de la Presse, 35 - 1000 Brussels, Belgium Tel + 32 2 274 48 00 - contact@apd-gba.be).

Article 8. You entrust us with certain data for processing

It may happen that you entrust us with certain data for processing, in particular when you use features of the platform that involve the encoding of personal data of your own customers, for example addresses or information about a property. In this case, we act as a processor and you as the data controller within the meaning of the privacy regulations. You undertake never to encode sensitive data, relating to health, criminal record, etc... You define yourself in your contractual documents and your privacy policy the duration and purposes of the processing as well as the categories of data processed.

We will only process these data on your instructions, as manifested by your use of the platform. Our employees and subcontractors are bound by an obligation of confidentiality. We ensure information security in accordance with section 32 of the DPMR that is appropriate to the state of knowledge, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of individuals.

We will pass on to you any request to exercise a right on the part of a person concerned for instruction and will help you to comply with Articles 32 to 36 of the RGPD, subject to a prior estimate if necessary.

At the end of the agreement, you will have one month to request the return of the data or its deletion. Unless you instruct us otherwise, we will proceed to delete this data without any instructions from you.

We hold at your disposal the information necessary to provide proof of compliance with the obligations laid down in Article 28 of the RGPD as well as the "processor" processing register referred to in Article 30 §2 of the RGPD.

We can use a second-tier subcontractor of our choice, which you agree to. We will inform you regularly about changes in these subcontractors.

Article 9. Use of Cookies

Cookies are small text files that are stored on the hard disk of the computer of visitors to the site. They contain information such as the user's language preference, so that the user does not have to enter this information again on a subsequent visit to the same website. For technical reasons, we use cookies for :

- memorize the language you have chosen,
- access your Account,
- use the Platform Features,
- allow subscription to our newsletters,
- allow sharing,
- protect our Platform,
- and manage the usage statistics of our Platform.

WHO INSTALLS THE COOKIES?

- First party cookie: these cookies are installed and managed by BETWEENPROS. They are specific to the BETWEENPROS Platform.
- Third party cookie: these cookies are installed and managed by a third party. They are installed during your navigation on the BETWEENPROS Platform and they allow certain data to be sent to third parties during your navigation on the BETWEENPROS Platform.

WHY DO WE USE COOKIES?

BETWEENPROS uses on <https://betweenpros.com/> three types of cookies:

- technically essential cookies with functional purposes;
- cookies for sharing on social networks;
- cookies for analytical purposes.

1. BETWEENPROS uses PHP to manage its website and its content. This software uses technically essential cookies. This means that these cookies are necessary for the proper functioning of this website. It is not possible to refuse these cookies if you want to visit our website.

2. BETWEENPROS also uses AddThis to allow the sharing of the pages of its site on social networks. These are therefore third party cookies. This means that we do not control the information that is collected via these cookies.

The use of these third party cookies is subject to your prior consent. You can therefore refuse to allow these cookies to be installed on your device. Access to our site will not, however, be denied. However, some features may not be available.

3. BETWEENPROS uses Google Analytics for analytical purposes. This analysis tool installs cookies that we use to quantify visits (traffic) to the website. Among other things, this allows us to know how many times a particular page has been read.

The use of these third party cookies is subject to your prior consent. You can therefore refuse to have these cookies installed on your device. Access to our site will not, however, be denied.

WHAT COOKIES DO WE USE?

1. Required

Cookie	Type	Duration	Description
PHPSESSID	Part One	Session (temporary)	This cookie contains the user's session.

2. Sharing

Cookie	Type	Duration	Description
Bku	Third party	6 months	This cookie stores information about users (not personal or sensitive data) for advertising purposes. Opt-out: http://www.addthis.com/privacy/opt-out
na_id	Third party	2 years	This website uses a widget from ShareThis that makes it easy to share the pages/links from this website on various social networks such as Facebook and Twitter. Opt-out: http://www.addthis.com/privacy/opt-out

Uid	Third party	1 year	This cookie creates a unique, machine-generated identifier. AddThis uses the user ID to allow the user to share content on social networks and to provide detailed statistics to the different providers. Opt-out: http://www.addthis.com/privacy/opt-out
uvc	Third party	2 years	This cookie updates the counter of the site's social sharing function. Opt-out: http://www.addthis.com/privacy/opt-out
na_tc	Third party	2 years	This website uses a widget from ShareThis that makes it easy to share the pages/links from this website on various social networks such as Facebook and Twitter. Opt-out: http://www.addthis.com/privacy/opt-out
notice_gdpr_prefs	Third party	N/A	This cookie allows users to share blogs/news articles on the most popular social networks. Opt-out: http://www.addthis.com/privacy/opt-out
preference_book	Third party	N/A	This cookie allows users to share blogs/news articles on the most popular social networks. Opt-out: http://www.addthis.com/privacy/opt-out
oid	Third party	1 year	Unclassified. Opt-out: http://www.addthis.com/privacy/opt-out
km_lv	Third party	5 years	This cookie provides analytical information about how visitors use the site. Opt-out: http://www.addthis.com/privacy/opt-out
loc	Third party	90 days	This cookie is a geolocation cookie, so we know approximately where people who share information are located. Opt-out: http://www.addthis.com/privacy/opt-out
mus	Third party	1 year	Unclassified. Opt-out: http://www.addthis.com/privacy/opt-out

3. Analytics

BETWEENPROS uses Google Analytics for analytical purposes.

Cookie	Type	Duration	Description
__atuvs	Third party	2 years	This cookie is a persistent cookie that is created and read by the social sharing site AddThis to ensure that you see the account updated if you share a page and that you return to it before our sharing account cache is updated. Opt-out: https://tools.google.com/dlpage/gaoptout Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
__utma	Third party	2 years	This cookie is installed by Google Analytics. The cookie is used to distinguish users and sessions and generates statistics on site traffic. Opt-out: https://tools.google.com/dlpage/gaoptout

			Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
umb	Third party	30 minutes	This cookie is installed by Google Analytics. The cookie is used to determine new sessions/visits and generate statistics on site traffic. Opt-out: https://tools.google.com/dlpage/gaoptout Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
__utmt	Third party	10 minutes	This cookie is installed by Google Analytics. The cookie is used to reduce the rate of requests. Opt-out: https://tools.google.com/dlpage/gaoptout Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
__utmc	Third party	End of navigation session	This cookie is installed by Google Analytics. The cookie is not used in ga.js. Configured for interoperability with urchin.js. Historically, this cookie worked in conjunction with the __utmb cookie to determine if the user was in a new session/visit. Opt-out: https://tools.google.com/dlpage/gaoptout Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
__utmz	Third party	6 months	This cookie is installed by Google Analytics. The cookie is used to store the source of traffic or the campaign that explains how the user reached your site. The cookie is created when the javascript library is run and is updated each time data is sent to Google Analytics. Opt-out: https://tools.google.com/dlpage/gaoptout Further information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_ga	Third party	2 years	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session and campaign data and to keep track of site usage for site analysis reporting. Cookies store information anonymously and assign a randomly generated number to identify unique visitors. Opt-out: https://tools.google.com/dlpage/gaoptout/Infor mations additional information: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage

HOW CAN I SEE WHICH COOKIES HAVE BEEN INSTALLED ON MY DEVICE AND HOW CAN I DELETE/MANAGE THEM?

You can configure your browser to inform you each time a cookie is created or to prevent cookies from being created, as follows:

- Internet Explorer:
<https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Chromium:
<http://support.google.com/chrome/bin/answer.py?hl=fr&answer=95647>
- Firefox: <http://support.mozilla.org/fr/kb/activer-desactiver-cookies>
- Safari:
https://support.apple.com/kb/PH21411?viewlocale=fr_FR&locale=fr_FR

Access to our Platform will not, however, be denied. However, some features may not be available.