# Privacy Policy

Preamble :

This Privacy Policy is intended to comply strictly with the GDPR regulations that came into effect in May 2018

## 1. Responsibility

Michel Lecrombs SA is responsible for the processing of the personal data (the "**Personal Information**") that we collect about you on the Website www.carsys.be (the "**Website**").

This Personal Information is intended for Michel Lecrombs SA and will be collected, processed and stored in accordance with Belgian law.

## 2. Personal Information

2.1. The only Personal Information to which Michel Lecrombs will have access will be the Personal Information that you freely provide or that is specified in this Privacy Policy. As such, it is essential that you be aware that, in order to subscribe to certain services offered through the Website, you will be asked to provide Personal Information. Failure to provide such Personal Information will prevent you from accessing or using the services concerned.

2.2. We collect Personal Information about you, particularly when you:

• Open an account on carsys.be

• Make an online purchase

• Subscribe to the newsletter / email alerts

• Contact Michel Lecrombs S.A. via the Website

2.3 Michel Lecrombs SA informs you that the collection of certain data required for registration on the carsys.be platform and the provision of services offered through the Website is mandatory, with the exception of fields in which it is indicated that this information is optional.

2.4. Failure to provide this data may prevent Michel Lecrombs SA from providing you with all the services related to this data.

2.5. In any event, you are solely responsible for the accuracy of the data provided and Michel Lecrombs S.A. reserves the right to exclude any user who has provided false data from the subscribed services, without prejudice to any other measure that may be taken in accordance with applicable law.

2.6. In the event of communication of third party data, you warrant that you have obtained the express consent of the third parties concerned to communicate their data to Michel Lecrombs SA for processing purposes as described above. In the event of a change in your Personal Information, Michel Lecrombs SA asks you to provide the amended data concerned in order to update them. As such, you undertake to provide sincere and accurate Personal Information and to ensure that all Personal Information provided to Michel Lecrombs SA is up to date.

## 3. Use of the system

3.1 We collect and process your Personal Information in order to provide you with the services ordered.

3.2 In particular, Michel Lecrombs SA may use this information for the following purposes

• Send email notifications for special promotions, unless you have opted out of receiving these communications;

• Send alerts for the vehicles you are following;

• Answer your questions or suggestions;

• Improve the quality of your visit to our Website;

• Send you our newsletter, unless you have waived your right to receive these communications;

• Contact you when purchasing a vehicle.

3.3 Michel Lecrombs SA informs you, and you agree, that it includes Personal Information communicated through the Website in a file held by Michel Lecrombs SA for the purpose of managing reservations and purchases made via the Website, the relationship with users, the development and improvement of the services offered and commercial purposes, including keeping you informed of all offers, products and promotions likely to interest you, whether by email or by any other equivalent means.

3.4. In the case of commercial communications by e-mail or any equivalent means, you expressly consent to the sending of advertisements through this means.

3.5. This consent may be revoked at any time via the unsubscribe link in your personal space.

## 4. Sharing

4.1. Michel Lecrombs SA has also contracted with third party service providers for the purpose of managing our database and providing technical or other assistance to the Website. Your Personal Information may be disclosed and transferred to these third party service providers and other providers when it is deemed necessary to communicate to them for the provision of these services.

4.2. If we need to share your Personal Information with a third party, we will only do so after we have entered into a contract with that third party whereby that third party undertakes to protect such Personal Information with appropriate security measures and refrains from using it for its own purposes.

4.3. We may also disclose your Personal Information to third parties:

• In the event of a transfer of our business or assets, in which case we may disclose your Personal Information to the transferor or potential transferee of such business or assets.

• If we are required to disclose or share your Personal Information in order to comply with any legal obligation or to enforce or apply our General Terms and Conditions of Sale or our General Terms and Conditions of Use of the Site and other contracts; or in order to protect the rights, property or safety of Michel Lecrombs SA, our customers or third parties. This sharing includes the exchange of information with other companies and organizations for the purpose of combating fraud and reducing credit risk.

## 5. Storage

5.1. We want our links and visitors to our Website to have confidence in its use. In this way, we are committed to protecting the information we collect.

5.2. We will only retain your Personal Information as necessary under applicable law for the purposes described in this Privacy Policy. Michel Lecrombs SA and its third party service providers will take all necessary physical, technical and organisational measures to prevent any unauthorised or unlawful processing, as well as any accidental loss, destruction or damage to your Personal Information.

5.3. We will take all necessary physical, technical and organisational measures to maintain the required level of security by taking into account the personal data processed and to prevent any unauthorised or unlawful processing, as well as any accidental loss, destruction or damage to your Personal Information.

## 6. Amendments to the Regulations

6.1. We make reasonable efforts to ensure that the personal data we hold about you are accurate, up-to-date and complete, to the extent necessary for the purposes for which we collect the data.

6.2. Under Belgian data protection law, you have the right to access and object, at any time, for legitimate reasons, to the processing of your Personal Information, as well as the right to update, correct or delete any Personal Information collected by us that is incomplete, inaccurate, obsolete or prohibited by law. You can do this directly online, once you have logged into your account or by contacting our services.

6.3. In order to protect your privacy and security, we will take all reasonable steps to verify your identity before granting access or making corrections.

## 7. Correspondence

7.1. As a carsys.be customer, you will receive, by email, information about our services, updates to our Website, personalized advertisements and promotions that are intended for your exclusive attention, such as offers, promotions, and other offers available on the Website as well as alerts regarding the entry into stock of vehicles. We provide this information ourselves directly or through third party service providers.

7.2. You will receive these emails regarding our Website unless you have opted out of receiving these communications. At any time, you may decide not to receive any further marketing or promotional emails from us. In this case, you can unsubscribe by clicking on the link provided for this purpose in our emails and other communications.

## 8. Modification of the Privacy Policy

8.1. This Privacy Policy may be updated from time to time. We therefore recommend that you regularly review this document in order to be fully aware of our commitments to the security and protection of your Personal Information.

8.2. A notice will be published on this Website to inform you of any significant changes to the Privacy and Data Protection Policy, which will specify, at the top of this Policy, the date of the last update.

## 9. Contact Information

If you have any questions about our Privacy Policy, please contact Arnaud REINKIN

• Or by e-mail (arno@carsys.be),

• Or by phone 00 32 492 720 720 720

• By mail to Michel Lecrombs SA, 6 rue André Feher, B-6900 AYE

## 10. Remedies

You can also always appeal to the Commission for the Protection of Privacy at commission@privacycommission.be .

Online since: 10.11.2018