

PRIVACY POLICY AND PROTECTION OF PERSONAL DATA

SOFICO considers the protection of your privacy to be of great importance. That is why we collect and process your personal data in accordance with the legal provisions in effect, in particular, the Law of 30 July 2018, which protects individuals with respect to the processing of their personal data, and the European Regulation of 27 April 2016, which concerns the protection of individuals with respect to the processing of personal data and the free transfer of said data ('General Data Protection Regulation', or 'GDPR').

This privacy policy informs you of the processing operations for your personal data and your rights in this respect. It aims to inform you about the following points:

1. Who processes your personal data
2. The categories of personal data processed
3. How and why is your data processed
4. What are your rights
5. How to exercise your rights
6. How long your data is stored
7. What security measures are taken to protect your data
8. Who has access to your data
9. Amendment of the privacy policy

1. Who processes your personal data?

SOFICO acts as the 'data controller'. The terms 'SOFICO', 'we' or 'our' that we use in this privacy policy refer to Société Wallonne de Financement Complémentaire des Infrastructures.

Contact information:

Société Wallonne de Financement Complémentaire des Infrastructures (SOFICO)

Rue du Canal de l'Ourthe, 9/3

4031 Angleur

Corporation number (TVA-BE) : 0252.151.302

Email: edwige@sofico.org

Telephone: +32 (0)4 231 67 00

2. What personal data is collected by SOFICO?

The processing of your personal data is limited to what is strictly necessary to achieve the aims pursued by SOFICO. The categories of data processed are outlined below.

- Identifying data
- Location data
- Data concerning your vehicle (optional)
- Any other data that you provide on a voluntary basis

3. How and why is your data processed?

SOFICO collects your personal data in various ways, with a view to providing you with an optimal, personalised and safe user experience on the Edwige application.

Processing your personal data, therefore, is essential for the Edwige application to work correctly and for the provision of our services.

You control the data that you provide us. When we collect your data, we indicate the mandatory fields with an asterisk. Some of the data that we request from you is essential for:

- the execution of the contract we have concluded with you;
- the supply of the service you have requested from us;
- compliance with legal obligations.

When said data is incomplete or erroneous, SOFICO reserves the right to interrupt or suspend certain operations, either temporarily or permanently.

The table below includes additional information about the following elements:

1. Cases in which your data is provided or collected;
2. The types of data we are likely to process;
3. Why we collect this data;
4. The legal basis for the processing of your data.

Under what circumstances may your personal data be provided or collected?	What personal data do we process?	For what purposes do we process your data?	What is the legal basis for the processing of your personal data?
Creation of a user account	Depending on the frequency of your interactions with us or our Edwige application, this personal data may include: <ul style="list-style-type: none"> • Your surname* • Your first name* • Your email address* • Your phone number • The phone number of the organisation with which they have concluded an assistance contract • Your registration number • The make, model and colour of your vehicle 	We use this data: <ul style="list-style-type: none"> • to allow you to create, access and manage your account • to identify you 	<ul style="list-style-type: none"> • for contractual requirements (Article 6, Section 1, b) GDPR) to provide you with the service you have requested
Call for assistance	Depending on the frequency of your interactions with us or our Edwige application, this personal data may include: <ul style="list-style-type: none"> • your geolocation data (this feature may be activated by pressing one of the assistance buttons) • any additional data that you wish to provide to us 	We use this data: <ul style="list-style-type: none"> • to allow you to report an incident and access our assistance service 	<ul style="list-style-type: none"> • for contractual requirements (Article 6, Section 1, b) GDPR) to record incidents and provide you with help and assistance
Emergency call (112)	Depending on the frequency of your interactions with us or our Edwige application, this personal data may include: <ul style="list-style-type: none"> • your geolocation data (this feature may be activated by pressing the '112' button) • any additional data that you wish to provide 	We use this data: <ul style="list-style-type: none"> • to allow you to report an incident and access an assistance service 	<ul style="list-style-type: none"> • for contractual requirements (Article 6, Section 1, b) GDPR) to record incidents and provide you with help and assistance

Under what circumstances may your personal data be provided or collected?	What personal data do we process?	For what purposes do we process your data?	What is the legal basis for the processing of your personal data?
Use of the application's text-communication interface ('Chat')	<p>Depending on the frequency of your interactions with us or our Edwige application, this personal data may include:</p> <ul style="list-style-type: none"> • your geolocation data (this feature may be activated by pressing the 'Chat' button) • any additional data that you wish to provide to us 	<p>We use this data:</p> <p>to allow you to report an incident and access our assistance service, if use of the 'Chat' feature is easier for you than a phone call.</p> <p>Instant translation of messages is one of the advantages of the 'Chat' feature.</p>	<ul style="list-style-type: none"> • for contractual requirements (Article 6, Section 1, b) GDPR) <p>to record incidents and provide you with help and assistance</p>
Sending traffic information	<ul style="list-style-type: none"> • Your email address 	<p>We use this data:</p> <p>to send you information about traffic (accidents, etc.)</p>	<ul style="list-style-type: none"> • to get your consent (Article 6, Section 1, b) GDPR)

4. What are your rights and how can you exercise them?

4.1. A guarantee of fair and lawful processing

Your personal data is always processed for the legitimate purposes outlined in the previous point. It is collected and processed in an appropriate, relevant and non-excessive manner and is stored only for the length of time necessary for achieving the intended purposes.

4.2. Right to access

If you are able to prove your identity, you have the right to obtain information about the processing of your data. As a result, you have the right to know the purposes of the processing, the categories of data concerned, the types of recipients to whom the data shall be transmitted, the criteria used to determine the data-retention period and the rights that you can exercise concerning your data.

4.3. Right of rectification

Inaccurate or incomplete personal data may be corrected. The User is primarily responsible for making the necessary changes in their 'User account', but you may also make a written request to us.

4.4. Right to deletion of data (or “right to be forgotten”)

You also have the right to delete your personal data in the following situations:

- Your personal data is no longer necessary for the purposes of the processing;
- You withdraw your consent to the processing and there is no other legal basis for the processing;
- You have exercised your right to object in a legitimate manner;
- Your data has been processed illegally;
- Your data must be deleted to fulfil a legal obligation.

SOFICO decides, on its own initiative, on the existence of the aforementioned criteria.

4.5. Right to restrict processing

In certain cases, you have the right to request the restriction of the processing of your personal data, in particular, in cases where the accuracy of the data is contested, your data has been processed illegally, the data is needed for legal reasons or for the time needed for SOFICO to verify that you may legitimately exercise your right to deletion of data.

4.6. Right to object

You also have the right to object to the processing of your personal data at any time. SOFICO shall cease processing your personal data, unless it is able to demonstrate that there is a compelling legal reason for said processing, which supersedes your right to object.

4.7. Right to data transfer or portability

You have the right to obtain all of the personal data that you have provided to us in a structured, commonly used format that can be read by a machine. This data may be transmitted to another party at your request, unless it is technically impossible to do so.

4.8. Right to withdraw consent

None of the aforementioned processing of your data is based on your consent.

5. How to exercise your rights

To exercise your rights, you can contact our data-protection officer by registered letter at Société Wallonne de Financement Complémentaire des Infrastructures, Rue du Canal de l'Ourthe, 9/3, 4030 Angleur, or by email to dpo@sofico.org. We will reply in a timely manner, within a month of receiving the request at the latest.

If you are unsatisfied with the processing of your personal data by SOFICO, you have the right to file a complaint with the Data Protection Authority:

Rue de la Presse, 35, 1000 Brussels

 +32 (0)2 274 48 00

 +32 (0)2 274 48 35

 contact@apd-gba.be

6. How long is your data stored?

The personal data processed by SOFICO is retained for the duration of the User's registration on the Application.

In the event that the User unsubscribes from the Application, SOFICO shall only retain their data in the event that said data is communicated following the occurrence of an incident that the User may have reported or in which they may have been involved. In this case, the data may be retained for a maximum period of ten years, a duration that corresponds to the statute of limitations for contractual-liability actions. Pressing one of the assistance buttons is considered to be a sign of a possible incident.

7. What security measures are taken to protect your data?

All technical and security measures have been taken to minimise the risk of unlawful or unauthorised access to, or processing of, your personal data. In the event of a breach of its IT systems, SOFICO shall immediately take the necessary measures to minimise the damages.

8. Who has access to your data?

Your data is only communicated to members of our staff and the Wallonia Public Service assigned to monitor the execution of contractual relations and the use of the Edwige application, as well as any competent administrative or legal authority that requires us to do so, where necessary.

9. Amendment of the privacy policy

We reserve the right to amend our Privacy Policy at any time. Any substantial amendment shall always be clearly communicated via our Edwige application. However, we encourage you to consult this document regularly.