

Privacy Statement



Introduction

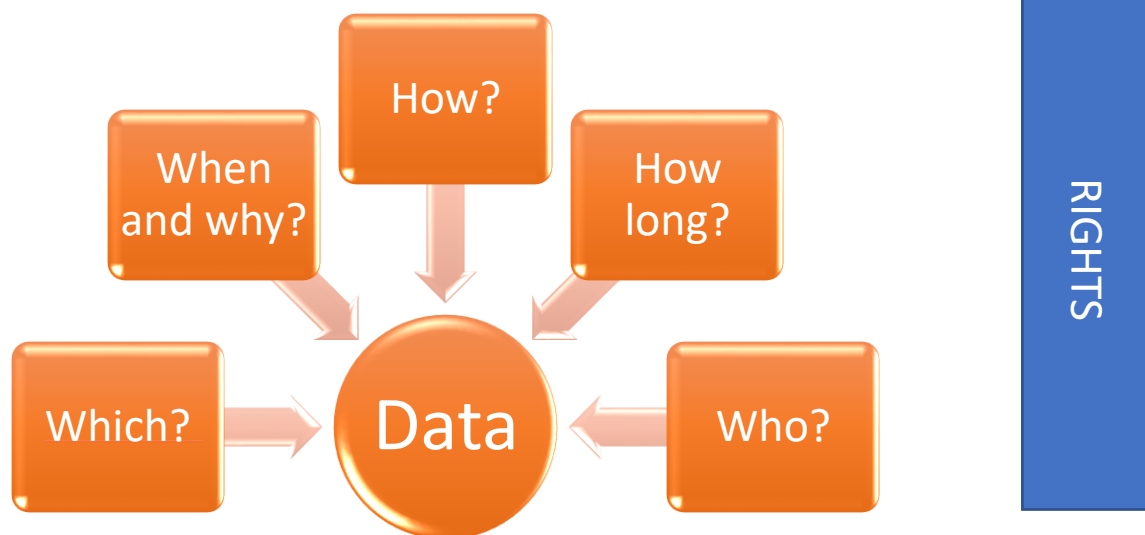
The **Organism for the Financing of Pensions (the OFP)** processes information about you, as a participant, pensioner or beneficiary of a pension plan managed by the OFP, including personal data in order to manage this pension plan and to grant you and eventually your beneficiaries the benefits pursuant this pension plan.

The OFP is responsible for processing your personal data and pays attention to the protection of your privacy. We are committed to protect your personal data and to process it with careful consideration and in complete transparency, and with due observance of the legislation on the protection of privacy, in particular the General Data Protection Regulation (or "**GDPR**" abbreviated).

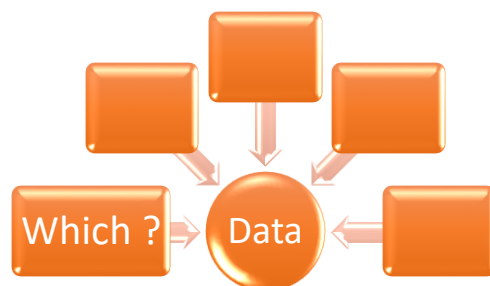
In this respect, we would like to inform you in this Privacy statement about:

- which type of data the OFP collects;
- why and how the OFP collects, uses and stores your personal data;
- what your rights and our obligations are regarding this processing.

You can also find information on the website of the Data Protection Authority by following this link: <https://www.privacycommission.be/nl>.



1. Which type of personal data do we collect?



In light of our activities (management and execution of the pension plan), we collect the following information about active participants, sleepers and pensioners:

- identification and contact details (such as your name, first name, date of birth, address; national registry number...);
- personal details (such as your nationality, sex, language...);
- the composition of your family (for example your civil state and the number of children you have);
- information related to your partner and children;
- employment information (for example the duration of your employment, your employment percentage, periods of suspension, your staff number, your function...);
- financial information (for example the number of your bank account, your tax residence, your salary, your bonuses, your commissions...);
- information related to the pension plan (for example the date of your affiliation with the pension plan, reserves with insurers included in your entitlement...);
- information related to reimbursements;
- payment history and listing of the annual payments due in the context of management of the pension plan;
- content of complaints and questions;
- formal complaints in the context of the Governance Complaint Management of the OFP;
- in the exceptional case that the OFP manages the risks of invalidity itself: details related to health (for example: begin and end date of the illness...)

Besides, in the context of management of death benefit coverage, we also collect the following information related to the beneficiaries:

- identification and contact details (such as name, first name, date of birth, address...);
- financial information (such as bank account number...).

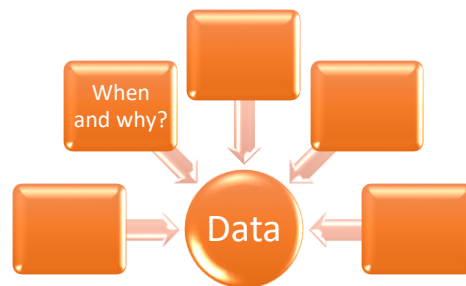
If you as a participant or pensioner provide us with contact details of your beneficiary, you acknowledge that you informed this person of this Privacy statement and, if necessary, that you were authorised by this person to provide this data.

The above mentioned information can either be provided directly by you or be communicated to us by your (former) employer or be obtained from public sources (such as the database containing

pension rights operated by SIGEDIS) or insurers involved in the management or execution of the pension plan.

In principle, we do not process any sensitive data ("Special Categories"), such as health related data. The OFP will only do this if strictly necessary for appropriate purposes, listed below or to comply with the legal obligations. In this case, the data will be processed under modified organisational and technical security, such as being only available and processed under the responsibility of a representative of the OFP, subject to a confidentiality obligation and with special prudence.

2. When and why do we process your personal data?



We will only process your personal data:

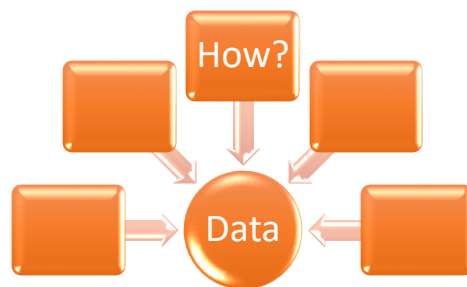
- for the correct execution of the pension plan or our contractual obligations towards you under your (former) employment contract or to take the appropriate precontractual measures on your request;
- to comply with an obligation pursuant to a law, a decree, an ordinance (for example tax obligations...);
- to protect our legitimate interest, in other words by the nature of our activity, to manage your pension plan in the best interest. In this respect, we aim for an equitable balance between our legitimate interest and respect of your privacy. It concerns situations in which we will process your personal data to operate as good as possible (for example: safety of our systems, networks and IT-systems, taking care of a cost-efficient service,...)

Your personal data will always be processed in respect of a specific and well-defined objective, using only those data that are necessary to achieve that goal. In particular, we will process personal data in respect of the following objectives:

- management of the pension plan governed by the OFP (depending on the plan, the risks covered are:
 - administration of the affiliations and withdrawals;
 - calculation of the acquired reserves and performances;
 - payment of the pensions and/or benefits
 - drawn up and communication of the annual benefit statements, as well as other overviews and calculations;
 - calculation of the contributions of the company;
 - follow up on the payments due by employees (if applicable);
 - implementation of the notifications to Sigedis.
- compliance checks;

- online tool related to the pension plan (if applicable);
- management of the underlying assets;
- provision of information to the (former) employer, the (re)insurer and the authorities;
- management and follow-up of the relation between the OFP and the participant, pensioner and of the beneficiary whose personal data are being processed.
- management of our IT, including management of the infrastructure and business continuity;
- protection of the economic interests of the OFP and supervision on compliance and reporting;
- compliance with the legislative requirements imposed to the OFP in respect of its activities;
- responding to official question of an authority or court that is mandated;
- archiving and storage of information, and
- any other objective imposed by law and/or an authority.

3. How do we protect your personal data?



Access to your personal data is permitted only to persons who need these data for the exercise of their tasks: they must observe strict confidentiality and comply with all technical and organisational provisions in order to ensure confidentiality of the personal data.

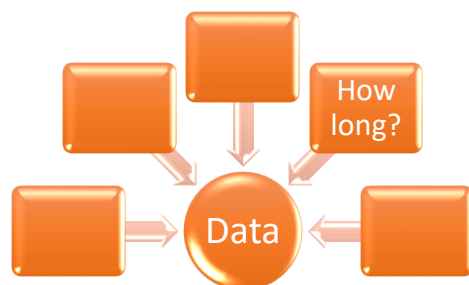
We have taken appropriate and organisational measures in order to offer you a level of security and confidentiality towards your personal data.

The purpose is to protect personal data against accidental and unlawful destruction or modification, unintended loss, unauthorised disclosure or access, or any other form of illegitimate processing.

Furthermore, while processing your personal data:

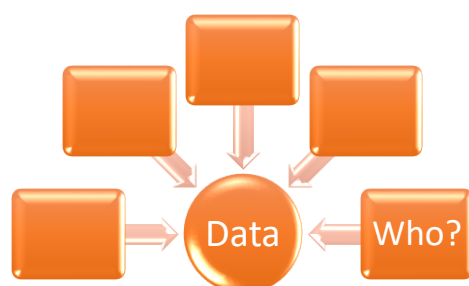
- we collect and process only personal data which is adequate, relevant and not disproportional, and only data that is necessary to achieve the objectives as mentioned above;
- we ensure together with you that your data remain up-to-date and accurate. Therefore, we request periodic updates from you and advise you to spontaneous and immediately report any modification to your data or (family) situation . This will only improve our services towards you.

4. How long do we store your personal data?



Your personal data will be stored as long as necessary to achieve the objective for which it was collected, and in compliance with the legal, regulatory and internal requirements applicable. To this extend, we have prepared a specific Data Retention Policy including all data and every category of data, in accordance with their objective, and moreover conform the statutory retention periods applicable. We can inform you on the relevant data retention period if required.

5. Who has access to your personal data and with whom will it be shared?



Internal Use

The access to your personal data is permitted only to persons involved in management and execution of the pension plan and in light of the objectives, as mentioned above.

External use

Some personal data will be passed on to certain third parties outside the OFP, in accordance with the objective mentioned above, but only if they need the information in the context of instructions given by us. This includes the following:

- third parties who collect personal data, such as your (former) employer, our service providers (e.g. Conac), (re)insurers, social security authorities and consultants...;

- third parties who perform governance tasks or key functions of the OFP, such as the internal and external auditor, the risk manager, the appointed actuary, the compliance officer, the data protection responsible person, ...;
- our advisors and external lawyers, for example in the context of a transfer or takeover of (a part of) the company or our assets;
- elke nationale of internationale overheidsinstantie, rechtbank of verbonden organisaties aan wie wij wettelijk verplicht zijn gegevens door te geven;
- every national or international public authority, court or related organisation towards which we are legally obliged to provide data.

The aforementioned third parties are contractually obliged to guarantee the confidentiality and security of your personal data in accordance with the applicable legislation.

In the context of the management and execution of the pension plan, your personal data can be passed on outside the European Economical Area (EEA). In this case, we shall provide the appropriate safeguards and securities in order to process your personal data in accordance with the provision in the applicable legislation on data protection.

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

Your rights



In accordance with the applicable data protection law, you have the following rights concerning your personal data:

Right to access	You can ask what personal data we have processed.
Right to correction	If you are of the opinion that the information we have is incorrect or incomplete, you can ask for a correction.
Right to be forgotten	In specific circumstances you have the ability to get your personal data erased. This is not an absolute right: we have the right to store your data if deemed necessary (for example to comply with legal obligations).
Right to data minimisation	In specific circumstances you can ask to limit the collection of your personal data or you can object to such collection (for example if the data is no longer necessary in order to achieve the purposes described above).
Right to data portability	In specific circumstances you have the right to receive personal information or have it transferred directly to another data processor.
Right to withdraw your consent	In case you gave explicit consent for the processing of your personal data, you have the right to withdraw such consent at all times. However, this may impact the further correct treatment of your file and other calculations and payments (e.g. health data). We advise to contact us first prior to withdrawal.
Right not to be subject to automated processing	Not applicable. The OFP does not process your data through automated profiling.
Right to notification of a data breach	If and when there is a data breach that is sufficiently serious and large as to impede your rights and freedoms, the OFP will honour its legal obligation to notify the Data Protection Authority in an adequate and timely manner and the OFP might also notify you. We will consider the measures necessary to remedy the data breach and to prevent it happening in the future.

We will examine and respect these requests, withdrawals or objections, in light of the objectives of the OFP and as required in compliance with the applicable legislation on data protection.

Exercise of your rights

In case you have a question or you wish to exercise the aforementioned rights, it is sufficient to send a dated and signed request together with an a one-sided copy (frontside) of your identity card (this allows us to identify you. We use your details only to verify your identity and no copy will be kept after the identification has been carried out) by post or email to:

[Contact details OFP or email of DPO OFP]

If you believe that the processing of your personal data has breach the legislation on data protection, you have the right to file a complaint to the Data protection authorities, having the following contact details:

Data protection authority
Drukpersstraat 35
1000 Brussels
Tel: +32 2 274 48 00
Email: commission@privacycommission.be

7. How will you be kept informed about modifications to this Privacy statement?

We reserve the right to modify this Privacy statement within the limits of the applicable legislation on data protection.

In case of any future amendment or modification to the processing of your personal data as described in this Privacy statement, we will provide you with a modified version of the Privacy statement and/or a website/URL where you can consult the most up-to-date version of the Privacy statement.
