

Privacy policy

Last updated on 26 September 2023

1. Parties and purpose

Willy Braillard SRL (hereinafter "Willy Braillard" or the "Data Controller") :
Chaussée de Louvain 435, 1380 Lasne
ECB / VAT : BE 0423.100.241
Email : info@braillard.be
Telephone: +32 (0)477 292689

SRL Willy Braillard has drawn up this Privacy Policy, the purpose of which is to provide transparent information to Users of the website hosted at the following address: www.braillard.be, (hereinafter the "Site"), about the way in which personal data is collected and processed by Willy Braillard.

The term "User" refers to any user, i.e. any natural or legal person, who visits or interacts in any way with the Site.

In this respect, Willy Braillard determines all the technical, legal and organisational means and purposes of processing Users' personal data. To this end, Willy Braillard undertakes to take all necessary measures to ensure that personal data is processed in accordance with the Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data (hereinafter "the Act") and the European Regulation of 26 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "the Regulation").

Willy Braillard is free to choose any natural or legal person who processes users' personal data at its request and on its behalf (hereinafter the "Processor"). Where applicable, Willy Braillard undertakes to select a Sub-processor offering sufficient guarantees as to the technical and organisational security measures for the processing of personal data, with regard to the Law and the Regulations.

2. Processing of personal data

Use of the Site by Users may result in the communication of personal data. The processing of such data by Willy Braillard, in its capacity as Data Controller, or by service providers acting in the name of and on behalf of Willy Braillard, shall comply with the Law and the Regulation. Personal data will be processed by Willy Braillard, in accordance with the purposes set out below, via :

- forms (contact forms, application forms, appointment forms) ;
- exchanges by email or post;
- the use of cookies.

3. Purpose of processing personal data

In accordance with Article 13 of the Regulation, the purposes of the processing of personal data are communicated to the User and are as follows:

- to provide you with advice and targeting services ;

- to develop our activities and to develop new product or service offers;
- to improve the quality of our services;
- personalise our services according to your preferences;
- to adapt our website and our content on the basis of your centres of interest and preferences.

4. Personal data likely to be processed

When visiting and using the Site, the User consents to Willy Braillard collecting and processing the following personal data in accordance with the terms and principles described in this Privacy Policy:

- surname, first name
- contact data, such as your telephone number, your e-mail address, your social network profiles;

5. Consent

By accessing and using the Site, the User declares that he/she is aware of and gives his/her free, specific, informed and unequivocal consent to the processing of his/her personal data. This agreement relates to the content of this Privacy Policy.

Consent is given by the positive act whereby the User ticks the box offering the Privacy Policy as a hypertext link. This consent is an indispensable condition for carrying out certain operations on the Site or for enabling the User to enter into a contractual relationship with Willy Braillard. Any contract between Willy Braillard and a User relating to the services and goods offered on the Site is subject to the User's acceptance of the Privacy Policy.

The User consents to the Data Controller processing and collecting, in accordance with the terms and principles set out in this Privacy Policy, his/her personal data that he/she communicates on the Site or in connection with the services offered by Willy Braillard, for the purposes indicated above.

The User has the right to withdraw his/her consent at any time. Withdrawal of consent does not compromise the lawfulness of processing based on consent previously given.

6. Retention period for Users' personal data

In accordance with article 13 §2 of the Regulation and the Law, the Data Controller only keeps personal data for as long as is reasonably necessary for the purposes for which it is processed.

This period is in any case less than : (i) 5 years for our customers (after the end of our commercial relationship, from the date of our last invoice or the last significant contact); (ii) 2 years for candidates (from the date of our last significant contact with you).

7. Recipients of data and disclosure to third parties

Personal data may be transmitted to Willy Braillard's employees, collaborators, subcontractors or suppliers who offer adequate data security guarantees and who collaborate with Willy Braillard in the marketing of products or the provision of services.

They act under the direct authority of Willy Braillard, and are in particular responsible for collecting, processing or sub-contracting this data.

In all cases, the recipients of the data and those to whom the data has been disclosed shall comply with the content of this Confidentiality Policy. Willy Braillard assures you that they will process this data solely for the intended purposes, in a discreet and secure manner.

8. Users' rights

Users may exercise their rights at any time by sending a message by e-mail to the following address: info@braillard.be or a letter by post, enclosing a copy of their identity card, to the following address Chaussée de Louvain 435, 1380 Lasne.

a. Right of access

In accordance with Article 15 of the Regulation, Willy Braillard guarantees the User the right of access to his/her personal data. The User has the right to obtain access to said personal data as well as the following information:

- the purposes of the processing ;
- the categories of personal data concerned
- the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular recipients established in third countries or international organisations;
- where possible, the length of time for which the personal data will be kept or, where this is not possible, the criteria used to determine this length of time;
- the existence of automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the Regulation, and, at least in such cases, useful information concerning the underlying logic, as well as the significance and expected consequences of such processing for the data subject.

The Controller may require payment of a reasonable fee based on administrative costs for any additional copies requested by the User.

Where the User submits this request electronically (via the e-mail address, for example), the information will be provided in a commonly used electronic form, unless the User requests otherwise.

The User will be sent a copy of his/her data no later than one month after receipt of the request.

b. Right of rectification

Willy Braillard guarantees the User the right to rectify and delete personal data.

In accordance with Article 16 of the Regulation, incorrect, inaccurate or irrelevant data may be corrected or deleted at any time. The User shall first make the necessary changes himself/herself from his/her user/other account, unless they cannot be made autonomously, in which case a request may be made to Willy Braillard.

In accordance with Article 19 of the Regulation, the Data Controller shall notify each recipient to whom personal data has been disclosed of any rectification of personal data, unless such disclosure proves impossible or would require disproportionate effort. The data controller shall provide the data subject with information about such recipients if he or she so requests.

c. Right to erasure

The User has the right to obtain the erasure of his/her personal data as soon as possible in the cases listed in Article 17 of the Regulation.

Where the Controller has made the personal data public and is required to erase it pursuant to the previous paragraph, the Controller shall, taking into account available technology and the costs of implementation, take reasonable steps, including technical steps, to inform other Controllers who process such personal data that the Data Subject has requested the erasure by such Controllers of any link to such personal data, or any copy or reproduction thereof.

The two preceding paragraphs shall not apply insofar as such processing is necessary:

- to exercise the right to freedom of expression and information;
- to comply with a legal obligation which requires processing and which is laid down by Union law or by the law of the Member State to which the controller is subject, or to perform a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for the establishment, exercise or defence of legal claims.

In accordance with Article 19 of the Regulation, the Controller shall notify each recipient to whom personal data has been disclosed of any erasure of personal data or any restriction on the processing carried out, unless such disclosure proves impossible or would involve a disproportionate effort. The controller shall provide the data subject with information on these recipients if he or she so requests.

d. Right to limit processing

The User has the right to obtain a restriction on the processing of his/her personal data in the cases listed in Article 19 of the Regulation.

In accordance with Article 19 of the Regulation, the Data Controller shall notify each recipient to whom the personal data has been disclosed of any restriction on the processing carried out, unless such disclosure proves impossible or would require disproportionate efforts. The data controller shall provide the data subject with information on these recipients if he or she so requests.

e. Right to data portability

In accordance with Article 20 of the Regulation, Users have the right to receive from Willy Braillard their personal data in a structured, commonly used and machine-readable format. Users have the right to transmit such data to another data controller without Willy Braillard being prevented from doing so in the cases provided for by the Regulation.

When Users exercise their right to data portability pursuant to the previous paragraph, they have the right to have their personal data transmitted directly from one data controller to another, where this is technically possible.

The exercise of the right to data portability is without prejudice to the right to erasure. This right does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability does not affect the rights and freedoms of third parties.

f. Right to object and automated individual decision-making

The User has the right at any time to object to the processing of his or her personal data due to his or her particular situation, including the automated processing of data by Willy Braillard. In accordance with Article 21 of the Regulation, Willy Braillard will no longer process personal data unless there are compelling legitimate grounds for the processing which override the interests and rights and freedoms of the User, or for the establishment, exercise or defence of legal claims.

Where personal data is processed for canvassing purposes, the User has the right to object at any time to the processing of personal data concerning him or her for such canvassing purposes, including profiling insofar as it is linked to such canvassing.

If the data subject objects to the processing for canvassing purposes, the personal data will no longer be processed for such purposes.

g. Right of complaint

Users have the right to lodge a complaint concerning the processing of their personal data by Willy Braillard with the Data Protection Authority, which is competent for Belgian territory.

Further information can be found on the website:

<https://www.autoriteprotectiondonnees.be>

Complaints can be submitted to the following addresses:

Data Protection Authority

Rue de la Presse 35, 1000 Brussels

Phone + 32 2 274 48 00

Fax: + 32 2 274 48 35

E-mail: contact@apd-gba.be

The User may also lodge a complaint with the court of first instance in his/her place of residence.

9. Cookies

The Site uses cookies to distinguish between Users of the Site. This makes it possible to provide Users with a better browsing experience and to improve the Site and its content. The purposes and methods of cookies are set out in this section.

a. General principles

A "Cookie" is a file deposited temporarily or permanently on the User's hard disk when consulting the Website, with a view to subsequent connection. Cookies enable the server to recognise the User's computer.

Cookies may also be installed by third parties with whom Willy Braillard collaborates.

Some of the cookies used by Willy Braillard are necessary for the Site to function properly, while others are used to improve the User's experience.

The User may personalise or deactivate cookies by configuring his/her browser.

By using the Website, the User expressly agrees to the management of cookies as described in this article.

b. Type of cookies and purpose

Willy Braillard uses different types of cookies on the Website:

- Technical cookies: these are necessary for the operation of the Website, allow the communication of data entered and are intended to facilitate the User's browsing;

- Statistical and audience measurement cookies: these cookies enable the User to be recognised and are used to count the number of Users of the Website over a certain period. Since they also indicate browsing behaviour, they are an effective means of improving the User's browsing experience by displaying proposals and offers likely to be of interest. They also enable Willy Braillard to identify possible bugs on the Website and to correct them.
- Functional cookies: these cookies facilitate use of the Website by retaining certain choices made (for example, user name or language);

c. Cookie retention period

Cookies are stored for the time required to achieve the intended purpose. The cookies likely to be stored on the User's hard disk and their retention period are as follows:

1 year maximum.

d. Cookie management

If the User does not want the Website to place cookies on their hard drive, they can easily manage or delete them by modifying their browser settings. Browser programming also allows the User to receive a notice or notification as soon as a Website uses cookies and thus decide whether to accept or refuse them.

If the User deactivates certain cookies, he accepts that the Website may not function optimally. Certain parts of the Website may not be usable, or may only be partially usable. If the User wishes to manage and/or delete certain cookies, they may do so by using the following link(s):

For Users with :

- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Microsoft Edge: <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=fr>
- Firefox: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>
- Safari: https://support.apple.com/kb/ph21411?locale=fr_CA

10. Limitation of the data controller's liability

The Website may contain links to other websites owned by third parties unrelated to Willy Braillard. Willy Braillard is not responsible for the content of these sites or their compliance with the Law and Regulations.

We pay particular attention to the importance of protecting children's privacy, especially in the context of their online interactions. This Site is not designed for persons under the age of 18 and does not intentionally target or solicit them. Under no circumstances will personal data be processed by the Data Controller if the User specifies that he/she is under 16 years of age.

The Data Controller may not be held liable for collecting and processing information and personal data from minors under the age of 16 whose consent is not effectively covered by that of their legal parents or for incorrect data - in particular regarding age - entered by minors.

Willy Braillard is not responsible for the loss, corruption or theft of personal data caused in particular by the presence of viruses or following computer attacks.

11. Security

The Data Controller implements organisational and technical measures to guarantee a level of security appropriate to the processing and collection of data. These security measures depend on the costs of implementation with regard to the nature, context and purposes of the processing of personal data.

The Data Controller uses standard encryption technologies within the IT sector when transferring or collecting data on the Site.

12. Modification of the Privacy Policy

Willy Brillard reserves the right to modify this Privacy Policy in order to comply with legal obligations in this area.

The user is therefore invited to consult the Confidentiality Policy regularly in order to be aware of any changes and adaptations. Any such modification will be posted on the Site or sent by e-mail for purposes of enforceability.

13. Applicable law and competent jurisdiction

This Privacy Policy is governed exclusively by Belgian law. Any dispute shall be brought before the courts of the judicial district of Willy Brillard's registered office.

14. Contact

For any questions or complaints relating to this Privacy Policy, the User may contact the Data Controller at the following address: info@brillard.be .