

## PRIVACY POLICY, BELGIUM

This privacy policy governs the processing of your personal data by Yours Advisory SRL, a limited liability company with its registered office at Avenue Louise 480/17, B-1050 Brussels, company number 0736.398.462 (hereinafter referred to as 'Yours Advisory SRL').

By entering a contractual relationship with Yours Advisory SRL or by visiting the website ([www.yoursadvisory.be](http://www.yoursadvisory.be)), you declare that you have read our privacy policy and expressly accept its content, the inclusion of your personal data in the files of Yours Advisory SRL and their processing by Yours Advisory SRL.

### **What is personal data?**

When you enter into a relationship with us as a customer, the following data, among others, are considered personal data:

- Identification data such as the customer's first and last name, address, place and date of birth, e-mail address, etc.
- Data relating to the customer's family situation: marriage contract, number of children, etc.
- Data relating to the customer's financial situation and composition: data relating to the nature and extent of the customer's regular income, assets, including cash, investments and property, etc.
- Information on steps already taken in terms of wealth planning: wills, deeds of gift, etc.

### **When is this data collected?**

This data is collected either when you become a customer of Yours Advisory SRL, or when you visit the Yours Advisory SRL website and fill in the contact form.

Data controller

The person responsible for processing personal data is Yours Advisory SRL, a limited liability company with its registered office at Avenue Louise 480/17, B-1050 Brussels, company number 0736.398.462.

The manager is recognized as an independent financial planner by the FSMA.

Any questions relating to the protection of personal data may be submitted in writing to the above address or by e-mail ([info@yoursadvisory.com](mailto:info@yoursadvisory.com)).

For what purpose is the data collected processed?

Your personal data (as a customer) is processed by Yours Advisory SRL for the purpose of providing financial planning advice.

Subject to your prior explicit consent, personal data will also be processed by Yours Advisory SRL:

- to inform the data subject about tax and financial matters by means of newsletters ;
- to approach and inform the customer in a targeted manner, for example following the entry into force of new legislation that has or may have relevant consequences for the customer.

If you do not enter into a relationship with us as a customer and only complete the contact form via our website, personal data will be processed by Yours Advisory SRL:

- to inform you about tax and financial matters by means of newsletters;

### **What is the legal basis for data processing?**

The collection and processing of personal data by Yours Advisory SRL in connection with the provision of financial planning advice is based on :

- the agreement that Yours Advisory SRL has entered into with the customer.
- Article 27 of the Law of April 25, 2014, which provides that before financial planning advice can be given, all necessary information on the customer's personal situation, including information on his financial, family and professional situation, as well as his financial planning objectives and needs, must be collected in writing in order to be able to give him appropriate advice (hereinafter referred to as the "Law of April 25, 2014").
- The Act of September 18, 2017 on the prevention of money laundering and terrorist financing and on limiting the use of cash.

The collection and processing of personal data in connection with the sending of our newsletters and information on legislative changes is based on the explicit consent of the data subject.

### **How long is personal data kept?**

With regard to the provision of financial planning advice, in accordance with Article 31 of the Law of April 25, 2014, the data collected and processed are kept for at least five years after the end of the contractual relationship with the customer.

In accordance with Article 60 of the Act of September 18, 2017 on the prevention of money laundering and terrorist financing and on limiting the use of cash, the identification data referred to in Articles 21 to 34 of the aforementioned Act are kept for a period of 10 years.

The personal data of persons with whom no customer relationship is concluded is kept by Yours Advisory SRL for 5 years.

### **What are your rights regarding your personal data?**

You have the following rights regarding your personal data:

- right to information

This privacy statement informs you about the nature of the personal data we process, the purposes for which we process them, how long we keep your personal data and the rights you have regarding your personal data.

- right of access, inspection and copy

You have the right at any time to inspect, free of charge, the personal data we process, how we use it and who has had access to it.

- right to amend incorrect or incomplete data

You have the right to request correction of the personal data we process.

- right to object

You also have the right to object to the processing of your personal data for reasons relating to your particular situation. In addition, you have the right at any time (without giving specific reasons) to object to the use of your personal data for direct marketing purposes, to be informed by means of a periodic newsletter and/or to be approached and informed of changes in the law that may have relevant consequences for you.

- The right to be forgotten (deletion of data)

You may indicate at any time that you wish Yours Advisory SRL to delete all or part of your personal data from its files, unless the processing is necessary to establish, exercise or defend a legal obligation.

If this is the case, Yours Advisory SRL is no longer authorized to provide the customer with financial planning advice, in accordance with Article 27 of the Law of April 25, 2014.

- right to limit processing for specific purposes

You may request to limit the processing of your personal data.

- right to withdraw consent

Insofar as the processing of your personal data is based on your prior consent, you have the right to revoke that consent.

- right to transfer to another responsibility

You have the right to have your personal data processed by us in a structured, common and electronic form and/or to have it transferred to other responsible parties.

- the right not to be subject to automated decision-making processes, such as profiling.

The processing of your personal data includes profiling. This means that Yours Advisory SRL may send you personalized communications and advertising based on your personal situation. You always have the right to object to such profiling free of charge.

You can easily exercise your rights by writing to Yours Advisory SRL (Avenue Louise, 480/17, 1050 Brussels) or by sending an e-mail to [info@yoursadvisory.com](mailto:info@yoursadvisory.com), enclosing a copy (both sides) of your identity card.

If you enter into a relationship with us as a customer, we must draw your attention to Article 65 of the Law of September 18, 2017 on the prevention of money laundering and terrorist financing and the restriction of the use of cash, which reads as follows:

“Article 65. The person concerned by the processing of personal data in application of the present law does not benefit from the right of access and rectification of his/her data, nor from the right to oblivion, to the portability of said data, or to object, nor from the right not to be profiled or to be notified of security breaches.

The data subject's right of access to personal data concerning him or her is exercised indirectly, under article 13 of the afore mentioned law of December 8, 1992, with the Commission for the Protection of Privacy instituted by article 23 of the aforementioned law.

*The Commission de la protection de la vie privée will only inform the applicant that the necessary checks have been carried out, and of the result, with regard to the lawfulness of the processing in question. These data may be communicated to the applicant if the Commission de la protection de la vie privée, in agreement with CTIF and after consulting the data controller, establishes that their communication is not likely to reveal the existence of a suspicious transaction report as referred to in articles 47 and 54, the follow-up given to it or the exercise by CTIF of its right to request additional information pursuant to Article 81, nor jeopardize the purpose of the fight against BC/FT, and, secondly, that the data concerned relates to the applicant and is held by the reporting entities, CTIF or the supervisory authorities for the purposes of the application of this law. ”*

To exercise your rights concerning your personal data, you should contact the Data Protection Authority (rue de la Presse 35, 1000 Brussels).

If you feel that your personal data has been processed incorrectly, you can lodge a complaint with the Data Protection Authority (rue des Pétitions de la République 35, 1000 Brussels).

**What are Yours Advisory SRL's obligations with regard to the personal data collected?**

Yours Advisory SRL, as well as its appointed agent(s) or representative(s), are bound by professional secrecy, subject however to the application of the provisions of the legislation and regulations relating to the prevention of money laundering and the financing of terrorism.

Yours Advisory SRL will not pass on the personal data collected to third parties. Only persons working for Yours Advisory SRL have access to the customer's personal data in the course of their duties.

However, your personal data will be communicated to external service providers (third-party service providers) that Yours Advisory SRL calls upon to assist the customer in the context of financial planning assignments (notary, lawyer, auditors, chartered accountants, social secretariat, etc.), after informing you in advance. This communication of personal data is limited to what is strictly necessary to achieve the intended purpose and takes place under the control of the person responsible.

In the event of a request for access, correction or deletion of personal data by a customer, Yours Advisory SRL is obliged to comply with the request within 30 days.

In the event of a security incident (data leakage) that poses a risk to the rights and freedoms of the customer - an individual - Yours Advisory SRL is obliged to report it to the data protection authority within 72 hours, unless the leakage does not constitute a danger to the personal data collected.