

PRIVACY POLICY OF REPOS PRODUCTION AND SOMBREROS PRODUCTION

This Personal Data Protection Policy (hereinafter the "Policy") contains the minimum rules that Repos Production and Sombreros Production (hereinafter "Repos Production", "Sombreros Production", "we", "our") have set with respect to the protection of Personal Data, for ensuring that the collection, use, storage and communication of Personal Data is carried out in a fair, transparent and secure way.

It meets and in some cases exceeds the main requirements of applicable laws and regulations. This Policy is also aligned with other specific policies of Repos Production and Sombreros Production relating to the collection and use of Personal Data implemented by each entity to cover the specific Personal Data Processing purposes needed for the day to day activity (e.g. cookies policy, specific policies such as B2C and B2B privacy policies).

In the event of a conflict between this Policy and specific privacy policies or applicable legislations, or in the event that the provisions of this Policy cannot be applied, the specific policy and applicable legislation shall prevail.

For your convenience, some useful definitions are provided in Section 2 of this Policy.

1. What is the scope of this Policy?

- 1.1 This Policy covers all Personal Data in any form, such as electronic data, paper or disk documents, as well as any type of Processing, manual or automated, owned or controlled by Repos Production and Sombreros Production, in all countries where Repos Production and Sombreros Production are present. This includes information about members of Repos Production and Sombreros Productions, their partners, employees, consultants, clients, consumers, suppliers, business contacts and any third parties.
- 1.2 The protection of minors is at the heart of our concerns and we have implemented various reasonable measures to prevent the Processing of Personal Data concerning them. Therefore, we do not process Personal Data relating to children without first checking their numerical majority, which may vary from country to country, or without obtaining on their behalf the consent of the person exercising parental authority if they are under the minimum age required to provide us with their Personal Data.
- 1.3 This Policy also applies to any Third Party who provides services for or on behalf of Repos Production and/or Sombreros Production. Such Third Parties must comply with standards of conduct consistent with the principles of this Policy.

2. Definitions of the terms

- 2.1 **Repos Production and Sombreros Production:** shall mean the **private limited liability company Repos Production** whose registered office is located at Rue des Comédiens, 22, 1000 Brussels, and registered with the Crossroads Bank for Enterprises under number 0863.606.935 and the **private limited liability company Sombreros**

Production whose registered office is located at Rue des Comédiens, 22, 1000 Brussels and registered with the Crossroads Bank for Enterprises under number 0535.709.224, represented by Mr Thomas PROVOOST, as joint data controllers.

- 2.2 **Third Party:** shall mean a third party or business partner who is entrusted with Personal Data by Repos Production and/or Sombreros Production or on behalf of Repos Production and/or Sombreros Production, such as suppliers, first level subcontractors or more or other service providers.
- 2.3 **Data Subject:** shall mean an identified or identifiable person whose Personal Data are being processed by Repos Production and Sombreros Production.
- 2.4 **Informed Consent:** shall mean any freely given specific and informed indication of the Data Subject's agreement to the Processing of his/her Personal Data.
- 2.5 **Personal Data or Personal Data:** shall mean any information that allows a natural person to be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity. Personal data are considered to be personal data when they allow anyone to link information to a specific person, even if the person or entity holding the data cannot make that link.
- 2.6 **Sensitive Data (or special categories of data which include** data revealing the ethnic or racial origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sexual life or sexual orientation) and **Personal Data relating to criminal convictions or offences** constitute a sub-category of Personal Data, which, by their nature, have been classified by law or by an applicable policy as requiring additional privacy and security protection measures.
- 2.7 **Data Process or Processing:** shall mean any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, access, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (and Process shall be interpreted accordingly).

3. **How do we ensure the lawfulness, fairness and transparency of our Personal Data Processing?**

Personal Data are processed (i) on the basis of legal grounds (ii) with informed knowledge of the Data Subjects.

- 3.1 We only use Personal Data:
- If necessary to perform a contract entered into by a Data Subject (examples: our employees, subcontractors, customers, suppliers, etc.); or
 - to comply with a legal obligation; or
 - where we have a legitimate business need or legitimate business reason to use Personal Data as part of our business activities (example: when carrying out a Processing of Personal Data to better know our customers); or

- where we have obtained the Data Subject's Informed Consent where such consent is specifically required. For instance, where required by law (example: to send commercial information through electronic communication means) or by specific applicable personal data protection policy, Repos Production and Sombreros Production may obtain the consent of the Data Subjects in order to collect, use, retain or disclose their Personal Data. This may also be the case where no other valid grounds described above is applicable, and to the extent permitted under applicable law.
- 3.2 We consider that it is important to assess the privacy risks before collecting, using, retaining or disclosing Personal Data, for example for the implementation of a new system or as part of a project.
- 3.3 Repos Production and Sombreros Production process Personal Data only in accordance with what is stated in their specific privacy policies and in accordance with any Informed Consent they have obtained from the Data Subject.
- 3.4 Repos Production and Sombreros Production do not carry out profiling operations on the basis of automated decision-making, unless legally grounded on a requirement of applicable law, or to meet the performance needs of a contract, or subject to the consent of the Data Subject, and provided that appropriate safeguards are implemented to protect the Data Subjects rights.
- 3.5 We use cookies to evaluate and improve the functionality of our websites. We also use cookies for advertising or analytics purposes, subject to your consent and depending on the choice you make using our cookie control tools. For more information on Repos Production and their use of cookies, please consult their online Cookie Policy on each of their websites.
- 3.6 Where legally required, we ensure that Data Subjects have access to relevant information on the Processing of their Personal Data, unless this is impossible or requires disproportionate effort. Such information includes in particular the purposes of the Processing of Personal Data, the types of Personal Data collected in the event that they do not come directly from the Data Subject, the categories of recipients, the list of rights that may be exercised by the Data Subjects, the consequences of a failure to reply, the conditions for the transfer of Personal Data outside the European Union (hereinafter "EU"), if any, and the mechanisms used to protect Personal Data in the event of transfer, etc. We comply with this request by providing the Data Subject with an information notice relating to the protection of Personal Data when collecting his/her Personal Data. Information notices relating to the protection of Personal Data shall be written in language which provides Data Subjects with a clear understanding as to how their Personal Data will be used.

4. How do we process Personal Data for specific and legitimate purpose and how do we verify that Personal Data is minimised and accurate?

Personal Data will only be collected and processed for legitimate purposes, complying with the Personal Data minimisation principle and ensuring the accuracy of the Personal Data processed.

- 4.1 They are collected for one or more specified, explicit and legitimate purposes. They

shall not be processed beyond these purposes or in a manner that is incompatible with those purposes.

- 4.2 We carefully evaluate and define the purposes of Personal Data Processing before launching a project (for example, recruitment data management, payroll, accounting and financial management, employee risk and safety management, IT tool allocation, and any other digital solution and collaborative platform, IT support management, health and safety management, information security, customer relationship, bids, sales and marketing, procurement, internal and external communication and event management, compliance with anti-money laundering anti-bribery obligations or any other legal requirements, in particular with regard to the fight against corruption, implementation of compliance processes, management of mergers and acquisitions, etc).
- 4.3 We ensure that the Personal Data we collect is relevant, adequate and not excessive with in relation to the purpose of the Data Processing and its possible use (consumer insights, marketing, promotions, etc.). This means that only the data necessary and relevant to the purpose sought can be collected and processed.
- 4.4 When collecting Sensitive Data or Personal Data relating to criminal convictions or offences, the principle of proportionality is fundamental. We do not collect Sensitive Data or Data relating to criminal convictions or offences, unless required by applicable law or when allowed by applicable law with the Data Subject's prior express consent.
- 4.5 All reasonable measures are taken to ensure that Personal Data are accurate and kept up to date at each stage of their Processing, i.e. during collection, transfer, storage and retrieval.
- 4.6 We encourage the Data Subjects to help us maintaining their Personal Data up to date by exercising their rights, including their rights of access and rectification.

5. What security and personal data protection measures do we implement?

Since employees, customers, suppliers, consumers and business partners put their trust in Repos Production and Sombreros Production when they provide them with their Personal Data, Repos Production and Sombreros Production **ensure the security and protection of said data during their Processing.**

- 5.1 We protect all Personal Data that we collect, use, store and disclose in the course of our business in accordance with usage policies, technical and organisational policies, standards and procedures.
- 5.2 The standard technical and organisational measures of the sector are implemented to prevent accidental or unlawful destruction or loss, alteration, unauthorised disclosure or access, or any other unlawful or unauthorised form of Processing of Personal Data.
- 5.3 Where Processing is to be carried out on its behalf by a Third Party, Repos Production and Sombreros Production select service providers offering sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the Processing of Personal Data complies with the provisions of the applicable laws and ensures the protection of the Data Subject's rights.

- 5.4 Repos Production and Sombreros Production shall endeavour to take all reasonable measures based on the principles of "Privacy by Design" and "Privacy by Default", as specified below, in order to implement the necessary safeguards when Processing Personal Data. Repos Production and Sombreros Production therefore adopt technical and organisational measures, at the earliest stages of the design of the processing operations, in order to preserve privacy and the principles of personal data protection right from the beginning of the process ("Personal Data Protection from the Design of the Processing" or "Privacy by Design"). By default, Repos Production and Sombreros Production ensure that Personal Data are processed in complete confidentiality (for example, only the necessary Personal Data are processed, short storage period, limited accessibility) so that by default such data are not accessible to an undetermined number of people ("Default Personal Data Protection" or "Privacy by Default").
- 5.5 When a Personal Data Processing is likely to result in a high risk to the rights and freedoms of the Data Subjects, we will carry out a privacy impact assessment prior to its implementation.
- 5.6 Any invasion of privacy, however small, will result in action. We will investigate all claims in connection with any potential or actual breach of this Policy or applicable laws, that are brought to our attention or of which we have become aware. We take all reasonable measures to limit the impact of such breaches.
- 5.7 You will find more information on the IT security measures in the security program of Repos Production and Sombreros Production. This program includes the IT Charter and any other security measures available within Repos Production and Sombreros Production.

6. How long do we keep your Personal Data?

- 6.1 Any person processing Personal Data on behalf of Repos Production and/or Sombreros Production shall keep it only for as long as it is necessary for the purpose for which it has been collected and processed (as well as for any other compatible purposes), which may include :
- to meet the needs of or support a business activity; or
 - to comply with a legal or regulatory provision and comply with the conditions of the applicable statute of limitations;
 - to defend against an action based on the breach of a legal or contractual obligation (in which case, Personal Data may be retained until the end of the corresponding statute of limitation period or in accordance with any applicable retention policy in the context of legal proceedings).
- 6.2 Personal Data are stored and destroyed in accordance with current legislation and any retention policy applicable to Repos Production and Sombreros Production.

7. What are your rights as a Data Subject?

We are attentive to any request, question or request from Data Subjects regarding their Personal Data. Where required by law, we allow Data Subjects to access, rectify, limit or delete their Personal Data as provided by applicable law. We also allow them to oppose the

Processing of their Personal Data and to exercise their right to portability.

- 7.1 **Right of access:** as required by law, we give the Data Subjects access to all their Personal Data as well as to the categories of data processed and recipients, the storage period, the rights of rectification, erasure or restriction of Personal Data where applicable.
- 7.2 **Right to Data portability:** we are also able to provide a copy of any Personal Data that we keep in our files in a compatible and structured format in order to allow the exercise of the right to portability of Personal Data within the limits of current legislation.
- 7.3 **Right to rectification:** the Data Subjects may request that any incomplete, obsolete or inaccurate Data be rectified, modified or deleted.
- 7.4 **Right to erasure:** the Data Subjects may request that their Personal Data be erased when one of the following reasons applies: (i) the Personal Data are no longer necessary for the purposes for which they were processed; (ii) the Data Subject withdraws his/her consent on which the Processing of his Personal Data is based; (iii) the Data Subject objects to the Processing of his or her Personal Data; (iv) the Personal Data are unlawfully processed; (v) the Personal Data must be deleted to comply with a legal obligation applicable to Repos Production and/or Sombreros Production.
- 7.5 **Right to limitation:** in cases where: (i) the accuracy of the Personal Data is contested, to allow Repos Production and Sombreros Production to verify it; (ii) the Data Subject wishes to limit his Personal Data rather than delete them, despite the fact that they are subject to unlawful processing; (iii) the Data Subject wishes Repos Production and Sombreros Production to keep his or her Personal Data, as the latter are necessary for the defence of his legal rights; (iv) the Data Subject objects to the Processing, but Repos Production and Sombreros Production verify the legitimate grounds for the Processing. These grounds are likely to prevail over the rights of the Data Subject.
- 7.6 **Right to withdraw consent:** where the Processing of Personal Data is based on the consent of the Data Subject, the Data Subject may withdraw his or her consent at any time without compromising the lawfulness of the processing operation based on consent before such withdrawal.
- 7.7 **Right to object: the Data Subject may at any time object to the** Processing of his/her Personal Data:
- when the Personal Data is processed for the purposes of direct marketing or profiling and direct mailings or,
 - to object to the communication of its Personal Data to Third Parties or,
 - where the Processing is based on the legitimate interests of Repos Production and Sombreros Production, unless the latter demonstrate that there are compelling legitimate grounds for the Processing which override the interests, rights and freedoms of the Data Subject or that the Processing is necessary for the establishment, exercise or defence of legal claims.

To exercise these rights, please use the contact information provided below in section 10 of this Policy.

The Data Subject also has the right to lodge a complaint with the competent supervisory authority.

8. When and how do we share your Personal Data with Third Parties?

Personal Data are shared with Third Parties only when permitted by law.

- 8.1 Personal Data may only be disclosed to persons (natural or legal) who need to have access to them, on a strictly limited 'need to know' basis and when the transfer of Personal Data is clearly justified: either because the Data Subject has consented to the transfer or because the disclosure of the Personal Data is necessary for the proper performance of a contract to which the Data Subject is a party, or for a legitimate purpose that does not infringe on the fundamental rights of the Data Subject, including his/her right to privacy (for example, disclosure of the Personal Data in connection with a merger or acquisition, etc.). In each case, the Data Subject must be informed of the likely disclosure of his or her Personal Data. The recipient will also be required to ensure that he/she will only use the Personal Data for legitimate / authorised purposes and will keep them secure.
- 8.2 If a particular disclosure is necessary to meet a legal obligation (for example, for the benefit of a government agency, law enforcement or security service, or in the context of legal proceedings), Personal Data may in principle be disclosed provided that the disclosure remains limited to what is legally required and, if permitted by law, that the Data Subject has been made aware of the situation (example: the Data Subject has been informed of such a possibility through an Informed Consent or is notified at the time of the request for disclosure).

9. How are international transfers of Personal Data from the EU protected?

Personal Data originating from Repos Production and Sombreros Production are not transferred outside the EU to a third country which does not ensure an adequate level of protection, unless appropriate safeguards have been implemented in accordance with applicable laws.

- 9.1 The international transfer of Personal Data is a very sensitive topic that we take seriously. We pay full attention before transferring Personal Data from their country of origin within the European Economic Area (hereinafter referred to as "EEA") to another country outside the EEA, whether such transfer is justified for technical reasons (storage, hosting, technical assistance, maintenance, etc.) or for main purposes (human resources management, customer database management, etc.).
- 9.2 We never transfer Personal Data internationally from an EEA country to a non-EEA country without ensuring that appropriate transfer mechanisms as required by applicable data protection laws are in place, to ensure adequate protection of Personal Data when transferred (examples: adequacy decision, Privacy Shield certification, signature of model clauses of the European Commission as appropriate, etc.). In some cases, we may also have notified the regulatory authority or obtain its pre-approval before the transfer is carried out.

10. How do we handle complaints?

- 10.1 Repos Production and Sombreros Production are committed to solving legitimate problems relating to the protection of the Personal Data of their employees, customers and other contacts. In the event that an employee believes that he/she has done something in breach of this Policy, he/she must contact Repos Production at the following address: gdpr@rprod.com and report the problem.
- 10.2 Data Subjects can complain about the protection of their Personal Data by writing an email to Repos Production at the following address: gdpr@rprod.com. They may also file a complaint with a supervisory authority. In particular, these possibilities are explained in the privacy policies accessible by or communicated to the Data Subjects.
- 10.3 In the event that a natural person covered by this Policy files a complaint about the Processing of his or her Personal Data or that of a Third Party, and the complaint has not been satisfactorily resolved through this internal procedure, Repos Production and Sombreros Production will cooperate with the appropriate data protection authorities and comply with their advices to resolve any outstanding complaints. In the event that the Data Protection Officer or the data protection authorities decide that Repos Production and Sombreros Production or one or more of their employees failed to comply with this Policy or the Personal Data protection laws, upon recommendation issued by the officer or the authorities, Repos Production and Sombreros Production will take appropriate measures to address any adverse effects and to promote future compliance.

11. Updating this Policy

As our business and regulatory environment are constantly evolving, this Policy is subject to change. You are therefore invited to consult it on a regular basis.

This Policy was implemented on January 31, 2019 and became effective on that date.

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