

PRIVACY DECLARATION

In accordance with the European Data Protection Regulation for Personal Data (GDPR)

Table of contents

PRIVACY DECLARATION	1
Table of contents	1
1 General information.....	2
2 Why do we process personal data?	3
3 What data do we process?	4
4 Transfer to third parties (receivers)	5
5 Cookies.....	5
6 Children.....	6
7 Retention period	6
8 Security of the data.....	6
9 Your rights regarding your data	6
10 Complaints	6
11 Changes to this privacy statement	7

1 General information

This privacy statement applies to all websites, domains and applications managed or operated by GLORiant BELGIUM BVBA, with registered office at Coremansstraat 34, 2600 Berchem, Belgium, Crossroads Databank for Enterprises number 0464.168.358, and to all websites, domains and applications managed or operated by XPOfleet BV, with registered office at Riviumboulevard 301-320, 2909LK Capelle aan den IJssel, the Netherlands, Chamber of Commerce number 64218295 (both or separately hereinafter also referred to as "we" or "us") and on websites and domains of our subsidiaries and affiliated companies. In this document, both companies are further described as GLORiant GROUP.

GLORiant GROUP places great value on your privacy and the protection of your personal data.

This privacy statement applies where GLORiant GROUP is designated as Controller for the processing of personal data. However, GLORiant GROUP is also a Processor, in which role it makes its applications available to its clients (the Controller). As a Processor, we refer to our disclaimer at <http://www.gloriantgroup.com/disclaimer>

The aim of this privacy statement is to provide clear and transparent information about how we handle personal data. We make every effort to protect your privacy, so we handle personal data with care.

GLORiant GROUP complies in all cases with applicable laws and regulations, including the General Data Protection Regulation (GDPR).

This in any case implies that

- we process your personal data in accordance with the purpose for which it was provided. These purposes and type of personal data are described in this Privacy Statement;
- the processing of your personal data is limited to the data necessary for the purposes for which it is processed;
- we request your express consent if we need it for the processing of your personal data;
- we have taken appropriate technical and organisational measures to ensure the security of your personal data;
- we do not pass on personal data to third parties, unless this is necessary for the purposes for which it was provided;
- we are aware of and want to respect your rights regarding your personal data, and we want to make you aware of them.

As GLORiant GROUP, we act as Controllers for the processing of your personal data. If you have questions about the privacy statement after reading it, or any more general questions, please contact us using the details below:

GLORiant BELGIUM BVBA: Coremansstraat 34, 2600 Berchem, Belgium

- GDPR Controller
- E-mail: privacy@xpofleet.com
- Phone number in Belgium: +32 (0)3 2301812
- Phone number in The Netherlands: +31 (0)85 7732177

2 Why do we process personal data?

Your personal data is processed by GLORANT GROUP for the purposes and under the legal grounds described below:

Situation	Description	Purpose	Legal ground
Personnel management	Recruitment and selection	Recruitment and selection	Justified interest
Internal operations	- General accounting, processing of incoming and outgoing invoices	General accounting	Legal obligation
Commercial activity	- Processing data from customers and prospects concerning commercial activity within the organisation (CRM) - Processing and structuring all kinds of requests (ticket/helpdesk/registration)	- Supporting the organisation's operations in connection with sales, contract management, quotations etc, of our products. - Insight into the activities related to the helpdesk, phone or written contacts, recordings of performances and evaluation of services and products	Justified interest
Commercial activity	- Processing visitor data on GLORANT GROUP websites (see Point 5, Cookies)	This information is only collected for statistical purposes and for the further improvement of the website	Justified interest
Product-related processing	- Processing customer data related to applications provided by GLORANT GROUP	To be able to demonstrate in disputes that the person was indeed in agreement. To monitor the operation of our applications, and detect and adjust any errors as quickly as possible.	Justified interest
Commercial activity	- Processing data related to the 'Fiscal tools' app and the free XPOfleet app download	To be able to contact potential customers/users via e-mail for feedback on the app, and possibly for commercial purposes	Justified interest
Protection	- Data processing related to security	Security of the office. Control of access to servers and software	Justified interest

3 What data do we process?

We process the following data obtained from you:

Situation	Description	Category
Personnel management	Recruitment and selection	Personal identification data (name, address, e-mail, phone number), identification data issued by government services
Internal operations	- General accounting, processing of incoming and outgoing invoices	Personal identification data (name, address, e-mail, phone number), identification data issued by government services, financial identification data
Commercial activity	- Processing data from customers and prospects concerning commercial activity within the organisation (CRM) - Processing and structuring all kinds of requests (ticket/helpdesk/registration)	Personal identification data (name, address, e-mail, phone number), identification data issued by government services, financial identification data, current employment, experience, position, etc., contracts and arrangements
Commercial activity	-Process visitor data on GLORANT GROUP websites (see point 5 Cookies)	Electronic identification data
Product-related processing	- Processing customer data relating to applications provided by GLORANT GROUP	Electronic identification data
Commercial activity	- Processing data related to the 'Fiscal tools' app and the free XPOfleet app download	Personal identification data (name, address, e-mail, phone number), identification data issued by the government services, electronic identification data
Protection	- Data processing related to security	Camera recordings, photographic recordings

4 Transfer to third parties (receivers)

If necessary for the processing purposes described above, GLORANT GROUP will hand over the data to third parties (receivers).

GLORANT GROUP cannot be held liable if the legitimate recipients of data have to submit personal data concerning contacts, customers or legal entities to local authorities, or handle them in an unsafe manner (e.g. legal obligations applicable in other countries).

The following categories of recipients are applicable for the processing as performed by GLORANT GROUP:

Situation	Description	Receivers
Personnel management	Recruitment and selection	
Internal operations	- General accounting, processing of incoming and outgoing invoices	Government services
Commercial activity	- Processing data from customers and prospects concerning commercial activity within the organisation (CRM) - Processing and structuring all kinds of requests (ticket/helpdesk/registration)	
Commercial activity	- Process visitor data on GLORANT GROUP websites (see Point 5, Cookies)	
Product-related processing	- Processing customer data relating to applications provided by GLORANT GROUP	
Commercial activity	- Processing data related to the 'Fiscal tools' app and the free XPOfleet app download	
Protection	- Data processing related to security	Government services

5 Cookies

GLORANT GROUP's websites (www.gloriant.be, www.xpofleet.com, www.xfmd.be, and www.xfmd.nl) use three types of cookies. A cookie is a small piece of information that is stored on your computer by your browser:

The first type of cookie is only temporary, and is erased as soon as you close your browser. These cookies are only used to let you navigate on the website.

A second type is used for our services, to identify you when you next visit.

A third type is used by Google Analytics to compile statistics about visits to this website. These cookies are managed by Google under the terms of the Google Privacy Statement, which can be consulted at <http://www.google.com/privacy.html>.

You can disable the use of cookies by adjusting the setting of your web browser, but this may prevent the website from functioning correctly.

6 Children

We only process personal data of minors younger than 16 years if written permission is given by the parent or legal representative.

7 Retention period

GLORIAN GROUP does not retain personal data for longer than is necessary for the purpose for which it was provided or as required by law. In addition to any applicable legal retention periods, GLORIAN GROUP undertakes not to keep the data for longer than 5 years after the last contact.

8 Security of the data

The following appropriate technical and organisational measures have been taken to protect personal data against unlawful processing:

- all persons who may become aware of your data on behalf of GLORIAN GROUP are obliged to maintain its confidentiality;
- we use technical measures to protect our ICT resources and the data processed on them;
- we pseudonymise/anonymise and encrypt personal data if there is reason to do so;
- we make back-ups of personal data in order to be able to recover it in case of physical or technical incidents;
- we regularly evaluate the technical and organisational measures taken;
- our employees have been informed about the importance of the protection of personal data.

9 Your rights regarding your data

You have the right to access, copy, change/rectify and erase your personal data received by us, for which you can contact us via our previously mentioned contact details.

You may also object to the processing of your personal data, or a part of it, by us or by one of our processors.

In addition, you have the right to receive your personal data held by us, and the right to have it transmitted directly from us to a different controller. We may ask you to identify yourself before we comply with the aforementioned requests.

10 Complaints

If you have a complaint about the processing of your personal data, please contact us directly via our contact details and the contact persons described earlier in this document (see section 1: General information)

You may always file a complaint with the supervisory authority in your country. For informative purposes: The contact details for Belgium and the Netherlands are as follows:

Belgium

- Commission for the Protection of Privacy (*Commissie voor de bescherming van de persoonlijke levenssfeer*)
- Drukpersstraat 35
- 1000 Brussels

- <https://www.privacycommission.be>
- commission@privacycommission.be
- +32 (0) 2 274 48 78

The Netherlands

- Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*)
- Bezuidenhoutseweg 30
- 2594 AV The Hague
- <https://autoriteitpersoonsgegevens.nl>
- +31 (0) 88 1805 250

11 Changes to this privacy statement

GLORIAN GROUP can change the privacy statement at any time. The last change was made on 23 May 2018.