

PRIVACY STATEMENT
on basis of Article 12.1 and 12.2 of the GDPR

U&I Learning nv, with its registered office at Industrieweg 78, 9032 Ghent, Belgium and its subsidiaries (hereinafter “**FLOWSPARKS**”, “we” or “us”) are the companies behind the websites www.flowsparks.com and their sub-domains. When you visit one of our websites, we may gather personal data about you. **FLOWSPARKS** is the Data Controller with respect to the processing of these personal data. This Privacy Statement explains which personal data we collect about you, why we do so and on which lawful bases.

Because **FLOWSPARKS** considers “processing your personal data responsibly” to be of the utmost importance, we would like to use this Privacy Statement to explain how and why we process your personal data and on which lawful bases, in full transparency. **FLOWSPARKS** endeavours to adhere to Regulation (EU) 2016/679 of 27 April 2016 (the General Data Protection Regulation which is known as the **GDPR**).

We will explain the following measures in the text below:

- Why we process personal data about you
- Which personal data we process about you
- Who has access to your personal data
- On which lawful bases we process your personal data
- How long we retain your personal data
- What rights you have

Please read this information through carefully so that you understand how and why we process your personal data and what rights you have accordingly.

Why do we process your personal data?

FLOWSPARKS does its best to offer every visitor a smooth, user-friendly, secure and personalised experience on our website. This is facilitated by cookies, i.e. small text files that are sent by your computer when you visit our website, or other techniques that are similar to cookies. When you visit one of our websites, these cookies collect information about your activities. These techniques enable us to recognise you, save your language preferences and settings, and load them more quickly so that we can offer you the best possible experience on our websites. Certain data is also collected for statistical purposes.

In all other cases, we clearly ask you for your contact details. This personal data may only be used to contact you with additional information or to provide with you with further information about the products and services you have requested from **FLOWSPARKS**.

In short, we process your personal data for the following purposes:

- Contact and management of the customer relationship;
- Protection against fraud and breaches. If you behave in a manner that could constitute a breach of a legal provision or that is not consistent with the normal use of a website, we may be obliged to take legal measures;
- Sending personalised communication with information and promotional offers;
- Statistical purposes for gauging the surfing behaviour of our visitors and being able to offer a better visitor experience.

Personal data we process about you

Typically, we only collect and store personal data that is strictly necessary for the purposes that we detail in the Privacy Statement. **In general, we only retain information on our websites from cookies, such as IP address, location, the browser you use to visit the site, click behaviour, pages visited, language preferences and information about your device.**

In all other cases, we clearly ask you to provide your personal data yourself. Depending on the campaign, this will usually be contact details such as **your surname, first name, telephone number, email address and the company you represent.** The information that you provide when we contact you may also contain personal data and may be processed.

Apart from you, who sees your personal data?

FLOWSPARKS may engage processors in order to offer its services. Processors are persons or companies that process personal data on demand or on behalf of the Data Controller, **FLOWSPARKS**. We engage the following categories of processors:

- Processors that are only responsible for hosting our databases;
- Processors that are only responsible for marketing and communication.

Under the GDPR, all of the aforementioned processors are obliged to guarantee the security and confidentiality of your personal data. **FLOWSPARKS** only works with parties that apply a privacy policy that is in line with the GDPR. To this end, we conclude a Processing Agreement with every processor.

Your personal data will not be exchanged or shared with third parties without your explicit and informed permission.

On which lawful bases do we process your personal data?

Article 6 of the GDPR sets out a number of lawful bases on which your personal data must be processed. **FLOWSPARKS** processes your personal data on the following lawful bases:

- Processing is necessary in order to execute the agreement between you and **FLOWSPARKS**, or pre-dates the conclusion of such an agreement (e.g. requesting a demonstration of our services).
- Processing is necessary in the context of legal provisions in relation to the management of the contractual relationship (e.g. invoicing).
- We have asked for your express permission to send promotions and newsletters.

How long do we retain your personal data?

We retain your personal data as long as it is required for the purposes set out in this Privacy Statement. We then delete this personal data. You also have a right to request deletion, if you believe that we are not processing your personal data lawfully.

What rights do you have?

According to privacy legislation, all persons whose personal data is processed have specific rights in relation to this processing. These rights are summarised as follows:

- You have a right to view your personal data on the condition that you can provide proof of identity.
- You have the right to have your personal data corrected if it is incorrect or incomplete.
- You can also ask for your personal data to be deleted. This may be done in the following circumstances:
 - When we no longer require your personal data for the aforementioned purposes;

- If you withdraw your consent for your personal data to be processed and there are no further lawful bases for processing your data;
 - If you lawfully submitted an objection to the processing of your personal data;
 - If your personal data is being processed in an unlawful manner;
 - If your personal data must be deleted on the basis of a legal obligation.
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- You can submit an objection to the processing of your personal data, specifically if it is processed for marketing purposes.
 - You may ask for the processing of your personal data to be restricted.
 - You have the right to receive a digital copy of your personal data so that you can transfer your data to another service provider. This concerns basic text computer files that can be read into other computers.
 - You have the right to withdraw your consent at any time.

We will work with you to establish how your rights can be most effectively exercised. Any questions and comments can be sent by email to privacy@flowsparks.com and will be processed within a period of 30 days.

What can you do if you are not happy with our response?

If you have any comments or complaints regarding the way in which we handle your personal data, we kindly ask you to let us know. This will allow us to work with you to find an amicable solution.

If you do so but are not satisfied with the processing of your personal data by **FLOWSPARKS**, you have the right to submit a complaint to the competent supervisory authority. The contact details for these bodies can be found here:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.