

# Privacy Policy

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## 1. Who are we?

Satellic acts as [Controller](#) as regard to your [Personal data](#). We collect, process and store your personal data using the appropriate security measures and in accordance with the applicable data protection legislation, among which the [General Data Protection Regulation \(GDPR\)](#).

## 2. What is the scope of this Privacy Policy?

The aim of this Privacy Policy is to give you information on how we handle and treat your Personal data. It describes how we use your Personal data, which Personal data we collect, how we collect it, on basis of which legal grounds we collect and process your Personal data, how long we store your Personal data and with whom we share it. Finally, it sets out your rights regarding our processing of your Personal data.

This Privacy Policy covers the processing of the Personal data of:

- Website visitors;
- Persons who receive the Satellic newsletter;
- (Contact persons of the) Users;
- (Contact person of) Any other party with which Satellic does or intends to do business (e.g. prospects, visitors of the Satellic offices, suppliers);
- Applicants.

Satellic was appointed as the “single Service Provider” in the sense of the [Road Pricing Regulations](#) by [Viapass](#). Whenever Satellic acts on behalf of Viapass and processes your Personal data with the purpose of calculating and collecting the [Toll](#) on behalf of Viapass and to assess whether a [Vehicle](#) has paid the appropriate Toll or is eligible for an exemption, Satellic acts as a [Processor](#). This processing by Satellic on behalf of Viapass is subject to a Data Processing Agreement. Notwithstanding, by means of this Privacy Policy, we would like to describe which Personal data we process when we act as a Processor: the corresponding information is written in this Policy in “bold script”.

## 3. Why do we collect your personal data?

### ❖ *I am a Website Visitor*

We collect your Personal data to:

- operate our Website - which is used for informational and commercial purposes;
- measure the effectiveness of the content and use of our Website;
- increase the ease of use of the Website and protect it from attacks;
- deal with enquiries, requests and complaints (e.g. sent via the online contact or request forms).

### ❖ *I receive the Satellic newsletter*

We collect your Personal data to:

- inform you of any event, news, survey or topic that may be interesting for you.

### ❖ *I am a (contact person of the) User*

We collect your Personal data to:

- **calculate and collect the Toll on behalf of Viapass;**
- **enable the Toll Charging Authorities to assess whether a Vehicle has paid the appropriate Toll or is eligible for an exemption;**
- fulfil our contractual obligations as administrator of your User Account, to deliver OBUs and to handle returned OBUs;
- fulfil our legal obligations (e.g. to respond to the requests from governmental authorities, such as supervisory agencies, fiscal authorities and investigation agencies);
- respond to your enquiries, requests and complaints;

- avoid and investigate (potential) Personal data breaches and (potential) security incidents;
- enhance and improve our services;
- identify trends and determine the effectiveness of our business activities;
- perform dispute management (e.g. enforce our contractual terms and conditions, pursue legal remedies or limit the damages we may sustain);
- manage the lifecycle of the OBU;
- manage the relationship with you and Viapass.

❖ *I am (a contact person of) any other party with which Satellic does or intends to do business (e.g. prospects, visitors of our offices, suppliers)*

We collect your Personal data to:

- fulfil our contractual obligations regarding (e.g. orders, invoices);
- fulfil our legal obligations (e.g. to respond to the requests from governmental authorities, such as supervisory agencies, fiscal authorities and investigation agencies);
- respond to your enquiries, requests and complaints;
- sustain public relations and press contacts;
- generate statistics and market researches;
- perform dispute management (e.g. enforce our contractual terms and conditions, pursue legal remedies or limit the damages we may sustain);
- avoid and investigate (potential) Personal data breaches and (potential) security incidents;
- manage the relationships with you;
- ensure the security of our offices, the safety of our employees and visitors, as well as guarantee the security of our assets and information located in our premises.

❖ *I am an Applicant*

We collect your Personal data to:

- assess your suitability for the position you applied for at Satellic (or determine if another position could match your profile at a later stage);
- prepare a contract, in case we decide to hire you.

## 4. Which Personal data do we collect and how do we collect it?

❖ *I am a Website Visitor*

We may obtain your Personal data when you fill in one of the online contact forms available on our Website:

- The “Contact & Complaints” form

When you fill in the “Contact & Complaints” form, we may collect the following Personal data: your name, e-mail address, licence plate number, OBU serial number, customer number, as well as the content of your message, including the documents you upload.

- The “Data Subjects’ Request” form

When you fill in the “Data Subjects’ Request” form, we may collect the following Personal data: your name, e-mail address, date of birth, address, telephone number, as well as the content of your message and a proof of your identity.

We may also obtain your Personal data via cookies when you use the Website. A cookie is a small file containing letters and numbers which is stored in your browser or on the hard drive of your device. Some of the cookies are managed for us by third parties.

Name	Data collected by the cookie	Storage period
cookie_compliance	This stores a value of 1 or 2, depending what the choice of the user was when (s)he got the “accept cookie” pop-up. This value determines whether the cookies containing personal information will be blocked or accepted.	Persistent/100 days
__cfduid	The “__cfduid” cookie is set by the CloudFlare service in order to identify trusted web traffic. It does not correspond to any user id	Persistent/5 years

	in the web application, nor does it store any personally identifiable information. <a href="https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfuid-cookie-do-">https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfuid-cookie-do-</a>	
_ga	Google Analytics cookie: This cookie is used to distinguish unique users by giving them a unique ID. It does not store any user information.	Persistent/2 years
_gid	Google Analytics cookie: This cookie is used to distinguish unique users by giving them a unique ID. It does not store any user information.	Persistent/24 hours
__zcmid	Zendesk cookie: It is used to store the user identity across visits, and across a single chat session.	1 session
_gat	Google Analytics cookie: This cookie is used to throttle the request rate. It does not store any user information.	1 minute

❖ *I receive the Satellic newsletter*

When you sign up on the Website to receive our newsletter, we collect the following personal information: your name and e-mail address. You can opt-out from our newsletter (sent via e-mail) at any time and free of charge by using the unsubscribe link which is in the footer of all the newsletters you receive, or by sending an e-mail to marketing@satellic.be.

❖ *I am a (contact person of the) User*

1) The Personal data we collect *because you give it to us* may include the following:

- When you create a User account via the Road User Portal:
  - o User identification information e.g. name, address, e-mail address, telephone number, VAT, IBAN, BIC, password and username.  
When you are the contact person of the User, we collect your name and professional e-mail address.
  - o Vehicle information e.g. License Plate Number (LPN), country of origin, [Gross Combination Weight Rating](#), [Emission Class](#) and Vehicle registration papers
- When you create a User account via a [Service Point](#):
  - o User identification information e.g. name, address, e-mail address, VAT and OBU PIN.  
When you are the contact person of the User, we collect your name and professional e-mail address.
  - o Vehicle information e.g. License Plate Number (LPN), country of origin, Gross Combination Weight Rating, Emission Class and Vehicle registration papers
- When you execute payments via the Road User Portal or a Service Point:
  - o Payment transaction information e.g. payment means (fuel card, debit and credit card, cash...), payment regime (post-paid or prepaid), timestamp of the transaction, amount of the transaction and channel of the transaction (Road User Portal or Service Point (in which case the location of the Service Point is also mentioned)).
- When you interact with our Website, the Road User Portal or our Customer support:
  - o A subset of the User identification information.
  - o A record of a summary of the call, chat, e-mail and postal exchanges.
- When you enter our offices and sign in at our reception desk:
  - o name, company name of the employer, time of your arrival and departure, name of the host and your picture (collected via the cameras located at the entrance of our offices).

2) The Personal data we collect *from the OBU when your Vehicle is driving in Belgium* may include:

- **Toll information e.g. date of usage, Toll road on which the Vehicle has driven, starting time, distance, amount of the Toll (taking into account the Vehicle information). The OBU sends this Toll information to our backend systems and we use this information to create your Payment Documents.**
- Journey information e.g. time stamp, GPS position, speed, direction and OBU ID. In case you have opted in for a Journey Visualisation, the OBU sends this journey information to our backend systems and we use this information to create your Journey Visualisation.

3) The Personal data we collect *from the enforcement equipment when your Vehicle is passing under it or next to it* may include:

- **An alpha-numeric read of your Licence Plate Number (LPN) and/or photographic images of your Vehicle.**

- If the Toll has been paid or if the Vehicle is eligible for an exemption, the alpha-numeric read of your LPN and/or the photographic images of your Vehicle are deleted immediately.
- If the Toll has not been paid, we prepare a dossier containing the details of the violation of the Belgian Road Pricing Regulations: location of the violation, time stamp of the violation, reason of the non-compliance to the Belgian Road Pricing Regulations, information coming from external databases such as the one of the DIV (Vehicle Registration Service) and the one of the CBE (Crossroads Bank for Enterprises) (hereafter called “enforcement record”). Satellic provides this enforcement record to the Toll Charging Authority responsible for the area in which the violation was committed. On this basis, the Toll Charging Authority may issue a fine for non-payment of the Toll. If there is not a 100% match between the alpha-numeric read of your LPN and the photographic images taken by the enforcement equipment, the photographic images of your Vehicle will be manually checked by an operator employed by Satellic before sending the enforcement record to the Toll Charging Authority. Additionally, before issuing a fine for non-payment of the Toll, the enforcement record is verified by an operator employed by the Toll Charging Authority. As a rule, your Personal data will not be used for automated decision-making. Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data without human involvement and can impact an individuals’ legal rights and/or circumstances, behaviour or choices.

4) The Personal data we collect because they *are publicly available*.

5) The Personal data we collect because they *are given to us by others, such as:*

- a [Business Partner](#), who provides us with your contact details and Vehicle information in order to help you register for a User Account and order services. Satellic will process the personal data obtained from a Business Partner in accordance with the current Privacy Policy. However, you may have a separate agreement with the Business Partner that will control that Business Partner’s use of your Personal data. In that case the current Privacy Policy does not apply to the information held by that Business Partner.
- your employer, who opted in for the journey visualisation we offer. In this case, Satellic processes the information on behalf of your employer. If you want to exercise your data subject’s rights pursuant to art 15-22 of the GDPR, you should direct your request to your employer in his quality of Controller.
- A third-party service provider that we use in the framework of our Additional Services (e.g. NV Tunnel Liefkenshoek, which provides us with the OBU ID, the LPN, as well as the day and time on which the Vehicle has passed through the barrier). Only in case you have ordered this Additional Services we use this information to create your invoice for the Additional Service.

❖ *I am (a contact person of) any other party with which Satellic does or intends to do business (e.g. prospects, visitors of our offices, suppliers)*

1) The Personal data we collect *because you give it to us* may include the following:

- contact details e.g. name, address, e-mail address, telephone number, IBAN, BIC.  
When you are the contact person of any other party with which Satellic does or intends to do business, we collect your name and professional e-mail address.

2) The personal data we collect because they *are publicly available*.

❖ *I am an applicant*

The Personal data we collect *because you give it to us* may include the following:

- your contact details e.g. name, address, e-mail address, telephone number;
- your personal data e.g. date and place of birth, nationality, gender, marital status;
- information on your educational and professional background, trainings and certifications;
- data generated by us e.g. interview report (including reference check and background check) and assessment results;
- any other Personal data required pursuant to the law.

## 5. What are the legal grounds for processing your Personal data?

### ❖ *I am a Website Visitor*

When you fill in one of the online contact forms on the Website, we process your Personal data based on our legitimate interests (handling your enquiries, requests and complaints in such a way that we provide you with the very best service) or to comply with a legal obligation (handling data subject's requests, as required by the GDPR).

We process your Personal data collected via cookies based on legitimate interests (see section 3.) or on your consent, insofar you have given it we request your consent before placing the cookies on your device. You give your consent by clicking on the appropriate button on the banner displayed. If you do not wish to give consent or if you wish to withdraw your consent to any cookie at any time, you will need to delete and block or disable the cookies via your browser settings. Please note that disabling these cookies will affect the functionality of our Website and may prevent you from being able to access certain features on our Website.

To change your cookies settings via your browser, you usually have to click on 'options' or 'preferences' in the menu of your browser. The following links may be helpful: [Cookie settings in Internet Explorer](#), [Cookie settings in Firefox](#), [Cookie settings in Chrome](#), [Cookie settings in Safari](#). Otherwise, you could also use the 'Help' option in your internet browser for more details.

### ❖ *I receive the Satellic newsletter*

We process your Personal data based on your consent to send you the Satellic newsletter. You can opt-out from our newsletter (sent via e-mail) at any time and free of charge by using the unsubscribe link which is in the footer of all the newsletters you receive, or by sending an e-mail to [marketing@satellic.be](mailto:marketing@satellic.be).

### ❖ *I am (a contact person of the) User OR I am a (contact person of) any other party with which Satellic does or intends to do business (e.g. prospects, visitors of our office, suppliers)*

We process your Personal data for the purposes mentioned hereafter:

- when it is necessary for the performance of any contract to which you are a party, or in order to take the steps (at your request) which are necessary before you can enter into a contract;
- when it is necessary to comply with our legal obligations;
- when it is necessary for the purpose of our legitimate interests and/or the legitimate interest of a third party, e.g. to identify trends, to perform dispute management, for client and supplier relationship management, to ensure the security of our offices and the safety of our employees and visitors.

### ❖ *I am an applicant*

We process your Personal data in order to be able to take the steps (at your request) which are necessary before you can enter into a contract.

If we do not immediately enter into a contract with you, we process your Personal data for the purposes of our legitimate interests (e.g. to check in the future whether your profile matches with a new open position).

## 6. How long do we store your Personal data?

### ❖ *I am a Website Visitor*

We keep your Personal data for no longer than reasonably necessary for the fulfilment of the purposes for which your Personal data was collected.

As a rule, the personal data we obtain through the online contact & complaints form issued by third parties other than Users are stored for a period of one (1) year. However, the Personal data stored in the cookies is stored for the period defined in the table set forth in section 3.

Depending on the situation, we may retain your data for a longer period, in particular if any longer retention period is required by the law or if litigations or investigations still might arise after the end of the defined period.

❖ *I receive the Satellic newsletter*

We keep your Personal data for no longer than reasonably necessary for the fulfilment of the purposes for which the data was collected.

As a rule, your Personal data will be stored for a period of (3) three months after you have withdrawn your consent.

❖ *I am (a contact person of the) User or I am a (contact person of) any other party with which Satellic does or intends to do business (e.g. prospects, visitors of our offices, suppliers)*

We keep your Personal data for no longer than reasonably necessary for the fulfilment of the purposes for which your Personal data was collected.

As a rule, the Personal data processed in the framework of a contractual relationship is stored for a period of (10) ten years as from the date on which the contractual relationship ends.

The Personal data collected when you enter our offices and sign in at our reception desk will be stored for a period of (2) two years after the day on which it was were collected. The pictures collected via the cameras located at the entrance of our offices will be stored for a period of (30) thirty days.

Depending on the situation, we may retain your data for a longer period, if any longer retention period is required by the law or if litigations and/or investigations still might arise after the end of the defined period.

❖ *I am an applicant*

We keep your personal data for no longer than reasonably necessary for the fulfilment of the purposes for which your Personal data was collected.

Your Personal data used for the recruitment process will be kept during the duration of that process, and for a period afterwards if you become one of our employees. If you do not become of our employees, we will keep your personal data for no longer than five (5) years starting on the day on which we had the last contact with you.

## 7. With whom do we share your Personal data?

Your Personal data will be treated strictly confidentially. Our employees will have access to your Personal data on a strict need-to-know basis and for the purposes described in section 3 “why do we collect your personal data?”.

Your Personal data may be shared with the following categories of recipients:

- our subprocessors (e.g. internet service, payment processing providers, logistic providers);
- third parties: Business Partners, authorities, additional service suppliers and Satellic advisors and auditors.

Your Personal data will not be transferred outside the European Economic Area (EEA).

## 8. Your rights concerning your Personal data

Subject to the conditions described in the applicable data protection legislation, you have the following rights with respect to your Personal data:

- the right to obtain access to the Personal data we hold about you and to obtain a copy of this data;
- the right to obtain the rectification of any inaccuracy in your personal data and the right to ask incomplete Personal data to be completed, insofar you were not able to correct or complete your data yourself on the Road User Portal;
- the right to obtain the erasure of your Personal data;
- the right to obtain the restriction of processing of your Personal data;
- the right to receive the Personal data you have provided to Satellic in a structured, commonly used and machine-readable format and the right to transmit this data to another controller (i.e. the right to data portability);
- The right to withdraw your consent to the processing of your Personal data at any time without affecting the lawfulness of the processing, if the processing is based on consent.

You have the right to object at any time to the processing of your Personal data for the legitimate interest of Satellic acting as Controller. Satellic shall act upon your objections unless there are compelling legitimate legal grounds for the processing of your data which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. If your Personal data is processed for direct marketing purposes (newsletters), you have the right to object at any time to the processing of your personal data for such marketing purposes. This also includes profiling to the extent that it is related to such direct marketing purposes.

To this end, if you want to exercise all your relevant rights, queries must be submitted as follows: complete and send us the [Data Subjects' Request Form](#). In addition, you can consult and/or amend your personal data yourself on the Road User Portal at any time.

If you have a complaint concerning the processing of your personal data, please complete and send the [Data Subjects' Request Form](#) as well, or write to our Data Protection Officer, Satellic NV, at 1831 Diegem, Airport Plaza Leonardo Da Vincilaan 19 A/4. Our Data Protection Officer will then analyse your complaint and work with you to resolve the matter.

**If such a query or complaint relates to the processing of your Personal data by Satellic acting as Processor for Viapass, Satellic will acknowledge your request and will ask you to submit your request directly to Viapass, the Controller, by sending an e-mail to [dpo@viapass.be](mailto:dpo@viapass.be).**

Satellic, **or as the case may be, Viapass**, will answer your query or complaint without undue delay and in any event within one month after the day on which your query or complaint was received. Taking into account the complexity of the request and the number of requests received, that period may be further extended with two months. You will be informed of such an extension during the first month following the receipt of the request. The reasons for the delay will also be specified.

If you still feel that your data has not been handled appropriately after we have responded to your request, you can, in accordance with the law, lodge a complaint to the Belgian Data Protection authority pursuant article 77.1 of the GDPR: by post to Drukpersstraat 35, 1000 Brussels, per e-mail to [contact@apd-gba.be](mailto:contact@apd-gba.be) or by phone +32 2 274 48 00

## 9. Changes to our Privacy Policy

We may change our Privacy Policy from time to time. However, we will not reduce your rights granted by this Privacy Policy. Any changes we make to this Privacy Policy in the future will be posted on our Website at least 30 calendar days before entering in force. To let you know when we make changes to this Privacy Policy, we will amend the revision date at the bottom of this page. The new modified Privacy Policy will apply from that revision date.

### Definitions

<b>Applicant</b>	Any person who applies for a position at Satellic
<b>Business Partner</b>	One of Satellic business partners, as indicated on its Website, <a href="http://www.satellic.be">www.satellic.be</a>
<b>Controller</b>	Natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and the means of the processing of Personal data
<b>Emission Class</b>	The class of a vehicle in function of its emission limits, as described in Annex I of Directive 1999/62/EU of the European Parliament and of the Council of 17 June 1999 on the charging of heavy goods vehicles for the use of certain infrastructures (as amended from time to time)
<b>General Data Protection Regulation (GDPR)</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the

	processing of personal data and on the free movement of such data, and repealing Directive 95/45/EC, or any later changes thereof.
<b>Gross Combination Weight Rating (GCWR)</b>	The maximum operating weight of an articulated Vehicle, as meant in the Road Pricing Regulations (called " <i>maximale toegelaten Massa van de slepen</i> " in Dutch, " <i>masse maximale du Train</i> " in French and " <i>maximal zulässiges Gesamtgewicht des Fahrzeugespanns</i> " in German)
<b>Personal data</b>	Any information related to an identified or identifiable natural person
<b>Road Pricing Regulations</b>	The Flemish Road Pricing Decrees, the Walloon Road Pricing Decree and/or the Brussels Road Pricing Ordinance
<b>Satellic</b>	Satellic NV is a limited liability company organised under the Belgian laws, with registered number 0556.799.596 and having its registered office at 1831 Diegem, Leonardo Da Vincilaan 19 A box 4 – Airport Plaza
<b>Toll</b>	Road pricing toll for the use of the Road Network, as described in the Road Pricing Regulations (called " <i>tol</i> " or " <i>kilometerheffing</i> " in Dutch, " <i>prélèvement kilométrique</i> " in French, " <i>Maut</i> " in German)
<b>Toll Charging Authorities</b>	The toll charging authorities as defined in the Road Pricing Regulations (called " <i>tolheffende instantie</i> " in Dutch, " <i>percepteur de péages</i> " in French, " <i>Mautbetreiber</i> " in German)
<b>User</b>	The person or entity who enters into the User Contract with Satellic or on whose behalf the User Contract is entered into.
<b>User Account</b>	Standard account or Service Point Account
<b>Vehicle</b>	A vehicle liable for Toll under the Road Pricing Regulations
<b>Viapass</b>	The inter-regional entity Viapass – incorporated by the Flemish Region, the Walloon Region and the Brussels-Capital Region – having its registered office at 1080 Brussels, De Koninckstraat 40, box 19
<b>Website</b>	The website of Satellic (URL: <a href="http://www.satellic.be">www.satellic.be</a> ).
<b>Website Visitor</b>	Person who has surfed on the website of Satellic (see "Website")