

General privacy notice

As the largest real estate portal in Belgium, we at Immoweb fully understand how important it is for everyone who works with us or calls on us every day to be able to do so with confidence. This is all the more true when our users, customers, suppliers, visitors and all other stakeholders entrust us with their personal data. We therefore do everything we can to prove that we are worthy of this trust and we always strive to collect and use these personal data in a transparent and ethical manner.

Introduction



With this privacy notice ("**Notice**") Immoweb NV, with registered office at Wolstraat 70, 1000 Brussels ("**Immoweb**", "**we**", "**us**") wishes to provide information on how we handle personal data and how we protect these personal data. Immoweb is part of the AVIV Group ("**AVIV**") whose parent company is AVIV Group GmbH and, within AVIV, personal data is processed centrally as much as possible.

In order to keep it comprehensible and clear for our various target groups, we have organised the information into different documents. This way, everyone has immediate access to the relevant information.

We address this Notice in particular to:

- the visitors to our website (<https://www.immoweb.be/> and all connected landing pages and portals of Immoweb; "**Website**"), our Immoweb mobile application and social media channels;
- the participants in Immoweb events;
- the participants in surveys, competitions and test panels;
- the visitors of the Immoweb company buildings;
- our customers and suppliers;

- applicants;
- anyone who has published an announcement for a real estate property online..

For private users of our services who have registered, please refer to the notice for registered users ("[Registered Users Notice](#)").

For professional users of our services who have access to the Immoweb Pro portal and/or use our professional services, please refer to the notice for professional users ("[Professional Users Notice](#)").

Both registered private users and professional users have access to our Website. The Registered Users Notice and the Professional Users Notice should therefore be read as supplementing and specifying this Notice.

0. Who are we?

This Notice is issued by Immoweb NV, acting in its capacity as data controller. Our address details are:

Immoweb NV
Wool Street 70
1000 Brussels
(BE)0429.223.614
RPR Brussels

For any questions or comments regarding the processing of personal data as described herein, please contact our Data Protection Officer at any time. You can do this by sending an e-mail to: privacy@immoweb.be.

For certain processing described herein, Immoweb will be jointly responsible with its subsidiary Immoweb Financial Services NV ("**IFS**"). After all, IFS shares a large part of its business processes with Immoweb. Where this is the case, we explicitly indicate this. You should then interpret this Notice to mean that it applies to both Immoweb and IFS, since they pursue the same objectives and have the same legal grounds.

However, you may contact Immoweb at any time for all your questions,

comments and for the exercise of your rights in connection with the processing of personal data. The address details are:

Immoweb Financial Services NV
Wool Street 70
1000 Brussels
(BE)0727.442.788
RPR Brussels

Registered with the FSMA under the aforementioned company number as a broker in mortgage loans and as an insurance agent.

1. You are using our Website

1.1 Consultation of the classifieds and information on our Website



1.1.1 The personal data we collect

When you visit our Website, perform searches or generally engage in certain interactions with the Website, we collect the following personal data:

- the data you enter as part of your search;
- your location, when you give us permission to track it;
- technical data relating to the device and network connection you use to visit our website (such as IP address, browser data, the moment you connect, etc.)

The data controller for the processing of this personal data is Immoweb. If you visit the sections which concern our financial services, Immoweb and IFS are jointly responsible.

Please note, however, that Immoweb and IFS are not responsible for any processing of your personal data on third party websites that are merely linked to our Website, unless otherwise expressly stated in this Notice. For example, we are not responsible for the processing of your personal data when you leave a review on the Immoreviews website (<https://www.immoreviews.be/>).

1.1.2 The purpose for which we process your personal data

We process this personal data in order to allow you to use our Website in a safe and responsible manner, for which we rely on the performance of the agreement you enter into with us when using the Website. The description of the services we offer through the Website can be found in our terms of use. You understand that we would not be able to perform the contract we have with you for the use of the Website if we were not allowed to process this personal data.

We also use your personal data for statistical analyses and to develop new products and services, for which we rely on our legitimate interest to understand the use of our Website and to evolve as a company.

1.1.3 How long we keep your personal data

The aforementioned personal data will only be stored for as long as you visit our Website and for three month afterwards.

1.1.4 The parties with whom we share this personal data

The personal data we collect when you visit and use our Website is shared with the following parties:

- IT service providers who help us to provide the Website.

1.1.5 SMS Communication

If you provide your phone number when using our services, we may send you SMS messages containing information about real estate that may be of interest to you to extend our service and you will be able to approve that with an SMS communication. For this purpose, a third-party service provider may send you SMS messages on behalf of Immoweb to ask you if you wish to receive offers related to new real estate projects. You can opt-out of these communications by following the instructions in the received SMS or by contacting us using the contact details provided in this General Privacy Notice.

1.2 Price estimation of your real estate



1.2.1 The personal data we collect

When you use our estimation tool to make a price estimate of your property on Immoweb (<https://schatting.immoweb.be/>) or on Realo (<https://www.realo.be/en/how-mu...>), we collect the following personal data:

- your phone number;
- your e-mail address;
- your form of address (Mr / Mrs), first name and last name
- your e-mail preferences;
- the address of your property;
- details regarding your property;
- whether you are the property's owner or someone else;
- your sales intentions regarding the property;
- your preferences regarding support from real estate professionals.

If you select a paid estimation report on Realo, we will also collect limited financial information in order to process your order.

The party responsible for processing this personal data is Immoweb.

1.2.2 The purpose for which we process your personal data

We process this personal data to:

- a) allow you to use the estimation tool and, if you so choose in the Realo estimation funnel, obtain a paid estimation report, b) to be supported in your sales project by our professional partners and c) to ensure that your data/information remains up to date by means of periodic emails, among other things. The processing of this personal data is therefore necessary to execute our agreement with you for the services you have chosen as mentioned in this paragraph ;
- collect them in order to provide them to our real estate professional who assists you by phone or email with your concrete sales project. The personal data you enter is therefore necessary for us and our real estate professional to help you to make the most of your project.
- feed our database with anonymized data which we use to display the overview of real estate prices as well as provide other data-driven insights in relation to the real estate market, for which we rely on our legitimate

- interest to gain an understanding and insight in the real estate market;
- feed our database with pseudonymized and anonymized data that we use to develop other products and services and to demonstrate to our customers the value of our range of services, for which we rely on our legitimate interest to further expand and promote our range of products and services to our customers.

If, at the end of the estimation request, you indicate that you wish to share your estimation data with one or more third parties (in particular real estate agents) in order to obtain a more refined estimation, we can ask you to provide additional personal data to provide this service. In this case, see section 4 "Communicating with third parties via our Website or the App". You understand that we would not be able to offer you the estimation tool if we were not allowed to process these personal data.

If you indicate at the end of the estimate request that you wish to receive our marketing communications by e-mail, you expressly authorise Immoweb to process your name, e-mail address and e-mail preferences for direct marketing purposes and you wish to receive such communications. You may withdraw your consent at any time. If you are a registered user, please refer to the Registered Users Notice. If you are not a registered user, you may withdraw your consent by using the "unsubscribe" link at the bottom of emails we send you or by sending an email yourself to privacy@immoweb.be.

1.2.3 How long we keep your personal data

The aforementioned personal data will be kept in identifiable form for thirty (30) days. Afterwards, they are automatically anonymised.

However, if you choose to receive our marketing emails, we will retain your email address and email preferences until such time as you withdraw your consent or change your preferences.

However, if you choose to be contacted by phone, we will keep your data for five (5) years.

1.2.4 The parties with whom we share this personal data

The personal data we collect when you use the estimation tool is shared with

the following parties:

- IT service providers;
- the third parties you have selected to receive a refined estimate;
- our professional partners
- other companies within AVIV.

1.3 Overview of real estate market



1.3.1 The personal data we collect

For the service on our Website that shows you the price overview of the real estate prices in Belgium (<https://price.immoweb.be/>), as well as for similar data-driven services on Realo providing market insights and statistics regarding the developments on the real estate market, we process the following personal data:

- The address of real estate;
- certain characteristics of real estate as well as its sales history;
- the personal data provided when someone places an advertisement on the Website, on publicly available or accessible online resources or uses the estimation tool;
- pictures of real estate properties which we obtain from Google Street View;
- statistical data from the public data sources such as Statbel (<https://statbel.fgov.be/nl/over-statbel/privacy/privacy-gdpr>).

For our service providing a price map for real estate in Belgium, the survey will only show an average price per square metre in a given location and the resulting data will therefore, in the vast majority of cases, not be traceable to a particular person. However, it is not excluded that in very exceptional cases, the average price may relate to a single property and thus potentially be traceable to a single person. It is important to underline, however, that the average prices displayed by our tool are only estimates and that we do our best to aggregate the information shown as far as possible.

For our market insights and statistical services on Realo, we collect information related to real estate properties from different online sources including our own

platforms in order to generate pseudonymous or anonymous insights and statistics which we then make available to our customers.

The party responsible for processing this personal data is Immoweb.

The personal data for the price map of Belgium is also shared with another company within AVIV, which uses the personal data in pseudonymised form to develop new products and services, conduct research into price trends and map real estate. This company itself is responsible for the processing:

DIGITAL CLASSIFIEDS FRANCE Falguiere Conseil SAS

2-8 rue des Italiens

75009 Paris Boulevard Haussmann 7/11

75009 Paris

France

[789 177 391503 068](tel:789177391503068) 306

1.3.2 The purpose for which we process your personal data

We process this personal data to:

- be able to offer you the price overview;
- generate and make available statistical surveys and market insights;
- improve our products and services and develop new ones.

For these purposes, we invoke our legitimate interest to be able to inform the market about price trends and market developments on the real estate market and to improve our existing services and develop additional ones. You understand that without these personal data, we would not be able to make the price survey or provide these market insights and statistics.

1.3.3 How long we keep your personal data

Personal data for the price map will be used only for a very short time in order to calculate average prices and will be de-identified almost immediately. The de-identified data will be kept permanently.

Personal data for generating market insights and market trends, which are largely pseudonymous, will be stored for as long as they are relevant to understand real estate market developments and provide relevant market

insights or until such time when you exercise a legitimate and valid right to object.

1.3.4 The parties with whom we share this personal data

The personal data we collect for the price survey is shared with the following parties:

- IT service providers;
- other companies within AVIV.

It goes without saying that the average prices are shared with everyone who visits and uses the price list.

The market insights and statistical results will additionally be shared with our real estate partners and other customers.

1.4 Immoweb Protect



1.4.1 The personal data we collect

For the service on our Website that allows you to apply for insurance as a property owner, landlord or tenant, we process the following personal data:

- your capacity as owner, landlord or tenant;
- certain characteristics of the property;
- your choices regarding insurance;
- your name;
- date of birth;
- telephone;
- e-mail address.

The data controller for the processing of this personal data in order to show you the insurance simulation is Immoweb. However, for the insurance offer, Immoweb works together with Qover NV. Immoweb is only responsible for bringing you to the insurance offer, but all further collection and processing of your personal data is done by Qover. For more information about how Qover processes your personal data, you are referred to Qover's privacy policy (<https://www.qover.com/terms-and-policies>). Qover's contact details are:

Qover NV
Commercial street 31
1000 Brussels
Belgium
(BE)0650.939.878
RPR Brussels

If you have subscribed to Qover's loan offer, Qover will inform us of your agreement with them.

When an Immoweb user accepts the offer from Qover and furthermore provides Qover with the contact details of five (5) contacts so that Qover can also contact them with an offer, Qover will also communicate the contact details of these five contacts to Immoweb and IFS. It is up to you to inform the contacts that you provide of the fact that their personal data are processed by Immoweb and IFS in the manner described in this Notice.

1.4.2 The purpose for which we process your personal data

We process this personal data to:

- to allow you to carry out an insurance simulation at Qover;
- statistical surveys;
- improve our products and services and develop new ones;

For these purposes, we invoke our legitimate interest to be able to inform our users about the services of our partner Qover and to be able to improve our existing services and develop additional ones. You understand that without this personal data, we cannot allow you to do a simulation with Qover.

We process the data we receive from Qover concerning your insurance contract only to calculate our commission. For this, we rely on our legitimate interest in verifying Qover's compliance with its contractual obligations.

We process the data relating to the five contacts you have provided Qover with exclusively for the purpose of calculating the commission. For this, we rely on our legitimate interest in verifying Qover's compliance with its contractual obligations.

1.4.3 How long we keep your personal data

We do not store the personal data for the insurance simulation and have no access to it.

The data relating to your insurance contract will be deleted as soon as we have been able to carry out the commission check.

1.4.4 The parties with whom we share this personal data

The personal data we collect for the insurance simulation is shared with Qover (see above).

1.5 Billboards



1.5.1 The personal data we collect

When you request the creation of advertising boards for your property, we collect the following information:

- Last name
- First name
- Postal address of the property listed and / or of the billboards buyer
- Email address

This data is necessary in order to provide you with a customized advertising board, including a unique QR code for your listing.

1.5.2 The purpose for which we process your personal data

We process this information solely in order to:

- Create the advertising board you have ordered;
- Send you a track & trace link of your parcel via email ;

- Send it to you by post.

The collection of this data is justified on the contractual legal basis (Article 6.1.b GDPR), since without it we would not be able to provide you with this service.

1.5.3 How long we keep your personal data

The data required for the creation and delivery of advertising boards is retained for a period of 4 years in the case of rentals, and 1 year in the case of sales.

1.5.4 Parties with whom we share this personal data

In order to produce and ship the advertising boards, we share the above listed personal data with our advertising board creation service provider.

2. You use our mobile app

2.1 The personal data we collect



When you use our mobile Immoweb application ("**App**"), available from the Google Play Store or the Apple App Store, we collect the following personal data:

- limited data concerning your device (OS, version, IP address, etc.);
- Your choices regarding our terms and conditions and personalised advertising;
- the feedback you give;
- your form of address (Mr./Ms.), your first name, last name;
- complete address of your property;
- the details of your property;
- contact details (including your telephone number);
- your preference on the duration of your sale project.

The party responsible for processing this personal data is Immoweb.

You will be asked to register as a user if you :

- want to save your search results in the application;
- want to put a property for sale;
- want to put a property for rent;

For more information on the personal data that will be processed at that time and the reasons why it will be processed, please see the [Registered Users Notice](#).

We also work with partners such as Google to display personalised advertising in our app. Google is responsible for the use of a unique advertising identifier that identifies you across different platforms. For more information about Google's processing of your personal data to serve personalised ads, please see Google's privacy notice (<https://policies.google.com/privacy?hl=nl>).

2.2 The purpose for which we process your personal data



We process this personal data in order to :

- enable you to correctly estimate the value of your property through the assistance of our advisors and the processing of this personal data is therefore necessary to execute our agreement with you for the use of the estimation tool;
- to contact you to find a real estate agent according to your needs, which is necessary to execute our agreement with you, the contact between the agent and the user being an essential element of our services;
- to feed our database of anonymous data that we use to display the overview of real estate prices in Belgium (see section 1.3 below), for which we rely on our legitimate interest to show a price map in Belgium;
- to populate our database with anonymous data that we use to develop other products and services and to demonstrate to our customers the value of our range of services for which we rely on our legitimate interest to continue to expand and promote our range of products and services to our customers.

- To enable you to list your property for sale or rent.

We also process this personal data in order to :

- provide you with our app in a safe and relevant manner and the processing of this personal data is therefore necessary for the performance of the agreement with you for the use of the app.
- for the purpose of statistical analysis and to create new products and services, for which we rely on our legitimate interest to understand the use of the App and to evaluate as a company.

If we want to offer you personalised advertising, including through third parties, we will ask you for your explicit permission to use the Google advertising ID for this purpose. Your personal data may then also be shared with third parties to enable this personalised advertising.

2.3 How long we keep your personal data



The aforementioned personal data will only be stored for as long as you use our App.

2.4 The parties with whom we share this personal data



The personal data we collect when you use our App is shared with the following parties:

- Service providers who assist us in our marketing activities;
- IT service providers;
- other companies within AVIV.

The use of Google advertising services in many cases implies that your personal data will be transmitted by Google to countries outside the European Union. This mainly concerns transfers to the United States of America. Please refer to Google's privacy notice for further information on how they organise these transfers, which you can access via the link above.

3. Communication with Immoweb and IFS

3.1 The personal data we collect

When you communicate with us by phone, through the Website, the App or by e-mail, we collect the following personal data:

- your name;
- your e-mail address;
- the content of the message or communication;
- the correspondent with whom you communicate on our side;
- technical data relating to the communication (such as IP address, e-mail header data, browser data, the moment you connect, etc.)

Please note, however, that we do not record telephone calls without this being stated explicitly at the beginning of the call. What does happen is that your telephone enquiries are recorded together with your contact details in our customer service department so that we can provide an appropriate answer to your questions.

The data controller for the processing of this personal data is Immoweb. If you communicate explicitly with IFS, however, Immoweb and IFS are jointly responsible.

3.2 The purpose for which we process your personal data

We process this personal data to:

- communicate with you and to respond or react to the questions or comments you send us;
- improve the functioning of our customer service;
- improve our products, services and processes.

We invoke our legitimate interest to be able to communicate with others as a company in a normal way and to be able to continuously improve our processes. You understand that we would not be able to answer your questions or communicate with you if we were not allowed to process this personal data.

When we record a conversation, we use the recordings solely for coaching and training purposes in pursuit of our legitimate interest, in particular to improve the operation of our call centre.

3.3 How long we keep your personal data



The personal data mentioned above are kept for as long as necessary to deal with the question or comment and for one year afterwards.

However, recordings of telephone conversations are only kept for one month.

3.4 The parties with whom we share this personal data



The personal data we collect when you communicate with us by phone, e-mail or the Website is shared with the following parties:

- External service providers that assist our customer service;
- IT service providers.

4. Communicating with third parties via our Website or the App

4.1 The personal data we collect



If you choose to contact a third party via our Website or the App, in particular a real estate agency, notary public or building developer, we will collect the following personal data and share it with the third party you have selected:

- your name;
- your e-mail address;
- telephone number;
- the content of the message or communication;
- email preferences;
- availability preferences for an appointment;
- the name of the third party with whom you are communicating;
- Profile information, such as your personal characteristics, property details,

etc.

The data controller for the **collection and transmission** of this personal data is Immoweb.

The data controller for the use of your personal data **after they have been transmitted** is the third party that you have selected. We transfer the personal data only so that you can be contacted by this third party or so that you can set up an appointment with this third party who has chosen to activate the Plato "powered by Immoweb tool". "Appointment" means the booking of a time slot to visit the Property, to estimate the Property or to make a telephone call. You must consult the privacy notice of this third party if you wish to know for what purposes this third party will use your personal data.

If you choose to save your contact details, you will be asked to register as a user. For more information on the personal data that will be processed at that time and the reasons for processing, please refer to the [Registered Users Notice](#).

4.2 The purpose for which we process your personal data



We process this personal data in order to be able to inform the third party chosen by you about your request for information or your request for an appointment and to store the data for a short period of time for security reasons. We only do this with your explicit consent, which you give when you click on the "Request more information" button. Naturally, we cannot inform the third party if you do not give your consent. You can withdraw your consent at any time, but obviously we cannot undo the fact that your personal data was lawfully transferred at the time you gave your consent. You must contact the receiving third party directly if you wish them to stop processing your personal data after withdrawing your consent.

4.3 How long we keep your personal data



The aforementioned personal data shall be kept for as long as necessary to transmit the question or comment and for three (3) months thereafter.

4.4 The parties with whom we share this personal data



The personal data we collect when you ask us to put you in touch with a third party is shared with the following parties:

- the third party you have selected;
- IT service providers.

5. You make use of our social media channels (Facebook, Twitter, LinkedIn)

5.1 The personal data we collect



When you use our social media channels, we collect the following personal data:

- the public personal data relating to your profile (e.g. name, gender, photos, etc.);
- your communications and interactions with us through the Channel (e.g. public and private messages, your "likes" and other comments, sharing our posts with others, etc.);
- the data that the social media platform itself collects based on your visits to, and interactions with, our pages on the channels (e.g. what posts you interact with, how long you visit the page, demographic characteristics, etc.).

The party responsible for processing this personal data is Immoweb.

As regards the collection of statistical and user data by the social media platform itself, in certain cases we are jointly responsible with the social media platform in question. For example, we are jointly responsible with Facebook and LinkedIn for the personal data they process to give us insight into which users visit our social media channels and how they use them. More information on our joint responsibility with these platforms can be found here:

- For Facebook: https://www.facebook.com/legal/controller_addendum
- For LinkedIn: <https://legal.linkedin.com/pages-joint-controller-addendum>

The respective platforms also each have a comprehensive privacy notice where you can find more information on the processing activities carried out by these platforms as data controllers:

- For Facebook: <https://www.facebook.com/privacy/explanation>.
- For LinkedIn: https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv.
- For Twitter: <https://twitter.com/en/privacy>.
- For Instagram: <https://help.instagram.com/519522125107875>.

5.2 The purpose for which we process your personal data



We process this personal data to:

- interact with users on our social media channels and build a community;
- be able to highlight our company, products and services through advertising activities on the social media channels;
- gain insight into how our social media channels are used and what exactly is going on among our users;
- collect statistical and demographic data on the users of our channels in order to better target our marketing activities.

We process your personal data for these purposes based on our legitimate interest to communicate with our users, advertise our products and build a community. You understand that we would not be able to communicate or interact with you through social media if we were not allowed to process this personal data.

For the purpose of compiling statistics and collecting demographic data, we and the social media platforms use cookies, pixels and similar technologies. We ask for your explicit consent to use these technologies on our Website. You can withdraw your consent at any time by managing your cookie preferences on the Website. Please note that the social media platforms on the social media channels themselves determine the legal basis for collecting such data on their platform. You can find more information in their respective privacy notices, which you can click through to the links above.

5.3 How long we keep your personal data



The aforementioned personal data will be kept in identifiable form as long as you do not delete them yourself. You can delete your previous messages, reactions and interactions yourself.

The statistics and demographic data that we receive from the social media platforms are no longer identifiable and we store them permanently. We do not have access to the personal data at the source of these statistics and demographic data.

5.4 The parties with whom we share this personal data



The personal data we collect when you use our social media channels is shared with the following parties:

- Service providers who assist us in our marketing activities;
- IT service providers;
- other companies within AVIV.

The use of social media channels in many cases implies that your personal data are transferred by the social media platforms to countries outside the European Union. This mainly concerns transfers to the United States of America. We refer to the privacy notices of the respective social media platforms for more information on how they organise these transfers, which you can click on via the links above.

6. You participate in one of our events

6.1 The personal data we collect



When you register for, and participate in, one of our events, we collect the following personal data:

- your name;
- your contact details;
- personal data that you leave behind when you register;

- personal data concerning your participation, such as photos taken at the event, interventions, etc.

The data controller for the processing of this personal data is Immoweb.

6.2 The purpose for which we process these personal data



We process your personal data in order to process your registration and allow you to participate, for which we rely on our legitimate interest to organise corporate events.

We process the personal data relating to your participation in particular in order to facilitate your participation, for which we rely on our legitimate interest to run an event in a safe and professional manner.

We process any photos taken at our events, provided they are not photos of which you are the specific subject, in order to communicate about our events, for which we rely on our legitimate interest to inform the public about the events we organise. However, if you are the specific subject of a photo and we wish to publish it, we will ask you for your express consent. We decline all responsibility for images taken by journalists or other photographers and cameramen who may have been present (public events) and work on behalf of third parties. Please contact them directly to ask them to delete the image in which you appear.

We process your contact details in order to inform you later about practical aspects of the event, to thank you for your participation and to invite you to any other similar events. For this purpose, we rely on our legitimate interest to inform existing users. If we wish to send you other advertising-related messages by e-mail, we will ask you for your express permission. You can withdraw this consent at any time.

6.3 How long we keep your personal data



Your registration and attendance data will be kept for the duration of the event. Depending on the event, these data may also be kept for up to three (3) weeks after it ends, to enable the Immoweb teams to thank you, to forward the

content that was covered, to make you aware of any lost objects that our teams have found, etc. At the end of this period, your data will be deleted.

Personal data published through publication channels in connection with the event will continue to be published until such time as you validly object to their publication or withdraw your consent.

6.4 The parties with whom we share this personal data



The personal data we collect when you use our social media channels is shared with the following parties:

- service providers who assist us in the organisation of our events;
- co-organisers;
- publication channels whose services we use to communicate about our events;
- IT service providers;
- other companies within AVIV.

7. Surveys, polls, competitions, user test panels

7.1 The personal data we collect



When you participate in our surveys, polls, competitions or test panels, we process the following personal data:

- your name;
- your contact details;
- the data relating to your participation.

The data controller for the processing of your personal data is Immoweb. If the survey, poll, competition or test panel is conducted by IFS, then Immoweb and IFS are jointly responsible for the processing of your personal data.

The results of test panels are received and processed by Immoweb in a pseudonymised manner wherever possible.

7.2 The purpose for which we process your personal data



We process your personal data to facilitate your participation in surveys, polls, contests or test panels, for which we rely on our legitimate interest to process personal data to conduct market research for and highlight our products and services and to improve our surveys, polls, contests and test panels based on generated statistics.

We also process your personal data in order to send you personalised e-mails. For this purpose, we ask for your explicit consent. You can withdraw your consent at any time by sending an e-mail to privacy@immoweb.be. You can also withdraw your consent by using the "unsubscribe" link at the bottom of the e-mails you receive from us. If you withdraw your consent, we will no longer send you e-mails.

7.3 How long we keep your personal data



For competitions, we keep your personal data as long as necessary to manage the entries, aggregate the results and contact the winner(s). They will be kept for six months after the end of the competition in order to deal with any complaints about the competition.

For participation in surveys, polls and test panels, data will be de-identified as soon as reasonably possible. The de-identified data shall be kept on a permanent basis.

7.4 The parties with whom we share this personal data



The personal data we collect for organising the surveys, polls, competitions or test panels are shared with the following parties:

- IT service providers;
- Marketing service providers;
- Service providers who assist us in organising and processing input from such surveys, polls, competitions or test panels;
- If you are the winner of a contest, we may also share your name and the fact that you have won through our social media channels and the

- Website;
- other companies within AVIV.

7.5 Transfer abroad

When we carry out certain surveys, we use well-known tools from abroad whereby your personal data may be transferred to the United States of America. We have concluded an agreement for this transfer with the relevant service providers on the basis of the standard contracts made available by the European Commission.

8. You visit our premises

8.1 The personal data we collect

When you visit our premises, we collect the following personal data:

- your name, position and company;
- the person at Immoweb or IFS with whom you have a meeting;
- the date and time of entry and exit.

The data controller for the processing of this personal data is Immoweb, unless you have an agreement with someone from IFS. In the latter case, Immoweb and IFS are jointly responsible.

8.2 The purpose for which we process your personal data

We process this personal data to:

- know, in case the building has to be evacuated, who is in it;
- To be able to follow up on visits to Immoweb, e.g. to prevent and follow up on incidents.

We process your personal data for these purposes based on our legitimate interest to fulfil our security obligations and to monitor visits to Immoweb. You understand that we may deny you access to the company premises if you refuse the processing of your personal data as described here.

8.3 How long we keep your personal data



The personal data mentioned above are kept in identifiable form for one (1) month.

When the data is needed to follow up an incident, it is kept for as long as it is necessary to deal with the incident and its aftermath.

8.4 The parties with whom we share this personal data



The personal data we collect when you visit our premises is shared with the following parties:

- IT service providers;
- preventive and emergency services in case of emergency;
- police forces, judicial authorities and legal service providers in the event of incidents;
- other companies within AVIV.

9. You are or represent a supplier or business partner

9.1 The personal data we collect



If you are or represent a supplier or business partner of Immoweb or IFS, we collect the following personal data:

- your name, position and company;
- your contact details;
- Your communications and interactions with us;
- data related to your products and services (e.g. your timesheets when you perform work to order).

The data controller in respect of the processing of this personal data is Immoweb. If it concerns a supplier or business partner of IFS, Immoweb and IFS are jointly responsible.

9.2 The purpose for which we process your personal data



We process this personal data to:

- to be able to do the contract follow-up;
- to complete the ordering and invoicing processes;
- to manage our supplier relationships.

We rely on our legitimate interest to be able to process your personal data as part of normal relationship management. If you operate as a sole proprietor, we rely on the necessity to process these personal data for the performance of our contract with you. You understand that we would not be able to execute the contract we have with you or your employer if we were not allowed to process these personal data.

9.3 How long we keep your personal data



The aforementioned personal data will be kept in identifiable form for ten (10) years after our relationship with you or your employer/client has ended, unless we receive earlier notification from your employer/client that you have changed position or are no longer employed by/provide services to this employer/client.

9.4 The parties with whom we share this personal data



The personal data we collect when you are a supplier or business partner of Immoweb is shared with the following parties:

- IT service providers;
- collection agencies, bailiffs and legal service providers in the event of non-payment or problems;
- accountants, business auditors, professional service providers, banks and payment institutions;
- other companies within AVIV.

10. You apply for one of our vacancies

10.1 The personal data we collect



When you apply for one of our vacancies, we collect the following personal data:

- your name, position;
- your contact details;
- work experience;
- training and academic curriculum;
- your image;
- notes taken during job interviews;
- any other information you wish to include in your CV and supporting communications.

The data controller for the processing of this personal data is Immoweb, unless you explicitly apply for a job with IFS. In the latter case, Immoweb and IFS are jointly responsible.

If you apply to us directly via LinkedIn or StepStone, LinkedIn and StepStone are initially responsible for the collection and processing of your personal data. For more information on how LinkedIn and StepStone process your personal data, we refer to the privacy notices of both respective platforms. However, we are not jointly responsible with LinkedIn and StepStone, in view of the different purposes of processing.

If you apply via a recruitment agency, the recruitment agency is initially the data controller until such time as we receive your personal data for the purpose of evaluating your application. For more information on how the recruiting company processes your personal data, please refer to the privacy notice of the recruiting company in question. However, we are not jointly responsible with the recruitment agency, given the different purposes of processing.

10.2 The purpose for which we process your personal data



We process this personal data in order to evaluate your application. This processing is necessary in order to establish a possible employment contract with you. You understand that we would not be able to consider your application if we were not allowed to process this personal data.

We also process your personal data to monitor and improve our recruitment process, for which we rely on the legitimate interest to improve our processes.

10.3 How long we keep your personal data



For those candidates who entered through a recruitment agency, we keep the personal data for at least twelve (12) months.

We keep the personal data of all candidates who are invited for an interview for three (3) years after the initial application. We do this to be able to look at your previous interviews in case you apply to us again at a later date.

If you were not invited for an interview and your application did not come through a recruitment office, your personal data will be deleted immediately after the negative decision on your application.

10.4 The parties with whom we share this personal data



The personal data we collect when you apply for one of our vacancies is shared with the following parties:

- IT service providers;
- HR service providers;
- other companies within AVIV.

11. Calls to real estate agents via a forwarding number (call tracking)

11.1 The personal data we collect



On some listings, the phone number displayed is not the real estate agent's direct number. It is a forwarding number assigned to that listing. When you call this number, your call is automatically forwarded to the relevant real estate agent. No Immoweb employee answers or listens to the call. In this context, we collect the following personal data:

- your phone number;
- the forwarding number you called and the listing it is linked to;
- the number of the real estate agent to whom your call is forwarded;
- the date, time and duration of the call, as well as its outcome (answered or not).

We do not record your calls and we have no access to the content of your conversations with the real estate agent. If the real estate agent does not pick up, you may be directed to their own voicemail. Any message you leave there is intended exclusively for the real estate agent and is neither recorded nor stored by Immoweb.

The controller of this personal data is Immoweb. Once the real estate agent receives your call or your phone number, they process this data under their own responsibility, in accordance with their own privacy policy.

11.2 Why we process your personal data



We process this personal data for the following purposes:

- Connecting you with the real estate agent you wish to contact. Forwarding your call is necessary to allow you to reach the real estate agent about the listing you are interested in. For this, we rely on our legitimate interest.
- Enabling the real estate agent to call you back. Your phone number is shared with the real estate agent you call. If the real estate agent is unable to answer, they receive a notification by SMS or email. This notification informs them that a call was made and at what time, and contains the reference of the relevant listing and your phone number, so that they can get back to you. For this, we rely on our legitimate interest, which aligns with yours, in allowing the real estate agent you tried to reach to follow up on your call.
- Measuring the number of calls generated by our website. We count the calls made via forwarding numbers so that real estate agents can assess the performance of their listings. For this, we rely on our legitimate interest in assessing and demonstrating the value of Immoweb's services. We limit the data used to what is necessary for this purpose.

You may object at any time to processing based on our legitimate interest by contacting us using the contact details provided in this General Privacy Notice. If you prefer not to go through a forwarding number, you can also contact the real estate agent via the contact form available on the listing.

11.3 How long do we keep your personal data?



Technical call logs are kept for 12 months by our telephony provider. The data needed to measure the number of calls generated is kept for 12 months and then deleted or anonymised.

11.4 The parties with whom we share this personal data



The personal data we collect in connection with call tracking is shared with the following parties:

- the real estate agent you call, who receives your phone number, including through the missed-call notification;
- our telephony provider (Twilio), which supplies the forwarding numbers and handles the technical forwarding of calls as a processor, acting on our instructions;
- the IT service providers who help us provide the website.

12. General purposes for which we process your personal data

12.0 Context



The general purposes for processing your personal data set out in this section apply to all categories of personal data described in this Notice. The data controller for these purposes is Immoweb, unless it is indicated above in this Notice that a category of personal data is also processed by IFS. In the latter case, both Immoweb and IFS are jointly responsible for the processing of your personal data.

12.1 Legal obligations and legitimate requests



12.1.1 The purpose for which we process your personal data

We process your personal data in order to comply with legal obligations, as well as to fulfil a legitimate request by competent officials or representatives of the police, judicial authorities, government bodies or agencies, including data protection authorities, for which we rely on our legal obligations.

12.1.2 How long we keep your personal data

Your personal data will be kept for as long as necessary to fulfil our legal obligations.

12.1.3 The parties with whom we share this personal data

Your personal data will be shared with the competent officials or representatives of the police, judicial authorities, government bodies or agencies to whom we are obliged by our legal obligation to provide the personal data.

12.2 Mergers and acquisitions



12.2.1 The purpose for which we process your personal data

We process your personal data to prepare and execute corporate transactions, such as mergers, acquisitions or demergers, for which we rely on our legitimate interest in entering into such transactions. You understand that in such business transactions the identity of the controller may change.

12.2.2 How long we keep your personal data

We will retain your personal data for as long as necessary to properly inform the parties involved in the transaction and for as long as necessary to enable further processing by the acquiring party after the transaction.

12.2.3 The parties with whom we share this personal data

The personal data that we collect and process when we prepare or execute a business transaction is shared with the following parties:

- IT service providers;
- the parties involved in the preparation and implementation of the transaction;
- Legal and professional service providers, including lawyers and business banks, assisting the parties;
- public authorities to be informed of the transaction;
- other companies within AVIV directly or indirectly involved in the transaction.

12.3 Defence in litigation and proceedings



12.3.1 The purpose for which we process your personal data

We process your personal data to defend ourselves in disputes and judicial or other proceedings, as well as to gather evidence and prepare our defence, for which we rely on our legitimate interest to be able to defend ourselves in such circumstances.

12.3.2 How long we keep your personal data

We will retain your personal data for as long as is necessary in the light of any imminent or ongoing proceedings and until all appeal and limitation periods have expired.

12.3.3 The parties with whom we share this personal data

The personal data that we collect and process when preparing and conducting our defence is shared with the following parties:

- IT service providers;
- experts and legal experts;
- legal and professional service providers, including lawyers and bailiffs;
- judicial authorities or administrations that need to be informed about the dispute or the proceedings;
- other companies within AVIV directly or indirectly involved in the dispute or procedure.

12.4 Data sharing within AVIV



12.4.1 The purpose for which we process your personal data

We are part of a larger group of companies that all operate in the same sector. It goes without saying that various processes are or will be organised at group level. We therefore share your personal data with the other companies in our group with a view to achieving economies of scale, identifying new opportunities, improving existing products and services and optimising business processes. We invoke our legitimate interest to maximize synergies within the AVIV group

12.4.2 The parties with whom we share this personal data

The personal data that we collect and process when preparing and conducting our defence is shared with the companies within AVIV, but in particular with AVIV Group GmbH as the parent company. AVIV will process the personal data for its own purposes. The contact details of AVIV Group are:

AVIV Group GmbH
Axel-Springer-Str. 65
10969 Berlin
Germany
HRB 172136

13. Your rights



1. Right of access - You have the right to request access to all the personal data that we have processed in relation to you. In order for us to grant this request, you must explain which personal data you wish to access. We reserve the right to charge an administrative fee for several consecutive requests. We also reserve the right to refuse requests that are manifestly unfounded or excessive.

2. Right of rectification - You have the right to request the rectification, free of charge, of personal data which are inaccurate. If a request for rectification is made, it must be accompanied by proof of the inaccuracy of the data for which rectification is requested.

3. Right to erasure - You have the right to request the erasure of your personal data if (a) you withdraw your consent and no other legal ground for processing remains; (b) we are obliged by law to erase them; (c) you have successfully exercised your right to object; (d) they are no longer necessary in view of the purposes described above or (e) the processing is unlawful. However, you should note that we will assess a request for deletion against:

- a) our overriding interests or those of a third party, insofar as permitted by law;
- b) legal or regulatory obligations or governmental or judicial orders.

Instead of deletion, you may also ask us to restrict the processing of your personal data if and when (a) you contest the accuracy of such data, (b) the processing is unlawful, or (c) the data is no longer needed for the purposes described above, but you need it to defend yourself in legal proceedings.

If you wish us to erase certain personal data which we obtain through direct integrations with third party vendors (e.g., Google Street View images), we highly recommend to exercise your request for erasure against these vendors directly. Otherwise, we cannot guarantee that your personal data will not automatically reappear in our services after we have erased it.

4. Right to object - You have the right to object to the processing of personal data, but you must explain the serious and legitimate reasons relating to your particular circumstances which justify such an objection. This explanation is not necessary if you oppose our processing of your personal data for direct marketing purposes.

5. Right to data portability - You have the right to request a copy of the personal data that you have provided to us digitally with your consent or for the performance of a contract in a structured, commonly used and machine-readable format.

6. Right to withdraw consent - If you previously gave your consent to the processing of your personal data, you may withdraw it at any time.

7. How to exercise your rights - If you wish to make a request to exercise one or more of the rights mentioned above, please send an e-mail to privacy@immoweb.be for all matters relating to data subjects' rights. An e-mail

requesting the exercise of a right shall not be construed as consenting to the processing of your personal data insofar as such processing goes beyond what is necessary in order to process your request.

That request must clearly state and specify which right you wish to exercise and the reasons for doing so, if required by law. It must also be dated and signed, and be accompanied by a digitally scanned copy of your valid identity card proving your identity. We ask this in order to prevent unauthorised persons from abusing your rights.

We will inform you of the receipt of this request without delay. If the request turns out to be well-founded, we will notify you as soon as reasonably possible and no later than thirty (30) days after receipt of the request.

If you have a complaint regarding the processing of your personal data by us, you can always contact us at the e-mail address mentioned in the first paragraph of this clause. If you are not satisfied with our response, you are free to file a complaint with the competent data protection authority, namely the Belgian Data Protection Authority (<https://www.dataprotectionauthority.be/citizen>).