

Renson My Lio Installer Privacy Notice

A. General

1. Definitions

- 1.1 'Application' means the Renson application(s) and / or website(s) through which the User enters personal data and to which this Privacy notice applies
- 1.2 'Account owner': means the person or legal entity who holds the account through which the Services are rendered and under whose authority Renson processes data as a data processor;
- 1.3 'Data': means the immaterial data that is being processed, especially but not limited to personal data, documents, photos, files,...
- 1.4 'Data Controller' means the person or legal entity responsible for the processing of personal data in accordance with art. 1, §4 Privacy Act and art. 4 (7) Privacy Regulation.
- 1.5 'External Service Provider': Service providers which are appointed by Renson to deliver data processing services. These include for example payment service providers, transport companies, debt companies and e-mail or newsletter senders.
- 1.6 'Parties' means Renson and the User;
- 1.7 'Privacy Act' means the Belgian Act of 8 December 1992 concerning privacy in relation to the processing of personal data.
- 1.8 'Privacy Regulation': means the *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 95/46/EC (General Data Protection Regulation or GDPR)*
- 1.9 'Services' means the services provided by Renson, resulting in the processing of data of the User and subject to this Renson My Lio Installer Privacy Notice.
- 1.10 'Third Party' means a natural person or legal entity, the public authority, administration or any other organisation, not being the User, nor Renson, nor the persons that are under the direct control of Renson entitled to process the data.
- 1.11 'User', 'Data Subject', 'You' or 'Your' means any natural person who discloses personal data to Renson.

2. Scope

- 2.1 This Renson My Lio Installer Privacy Notice applies to all personal data processed by the following Applications or for the following Services of Renson :

System / business process	Applicable ¹
Renson Healthbox 3.0 (app)	
Renson My Lio User	
Renson My Lio Installer (installer)	●
Online Account management	

Table 1. Scope of the Renson My Lio Installer Privacy Notice

Personal data being processed	Requirement (art. 9.1)		Necessity (art. 9.2)		Special cat. (art. 8.1)	Consequences of non-provision of data (art. 9.3)			Purposes (art. 12.1)
	Statutory	Contractual	Necessary	Optional		N.A. ²	DSS	NIP	
Account data (login & password)	●		●			●			SERV, TR
Email		●	●			●			COM, DCP, SERV, SUP, TR
Implicite User Feedback - Gathering information about how the User uses the Renson My Lio Installer application		●	●			●			OPT
Internal unique identifier		●	●			●			[all purposes]
First and last name	●		●			●			COM, DPC, PRODREG, SERV, SUP, TR
Telephone Number		●		●			●		COM, SUP
Performance data on installation Renson products (Identity executing installer, date, duration and time of installment, location of installment, etc.)		●	●			●			PRODREG

Table 2. Overview of Personal data being processed

8. Special categories of personal data

- 8.1 If Renson processes special categories of personal data in accordance with articles 6 and 7 Privacy Act or article 9 Privacy Regulation, this is indicated as in Table 2. Overview of Personal data being processed.

9. Requirement of personal data

- 9.1 The processing of the Data mentioned in Table 2. Overview of Personal data being processed is a

- statutory requirement: data marked as such in the column 'Statutory';
- contractual agreement: data marked as such in the column 'Contractual'.

- 9.2 The provision of the personal data mentioned in Table 2. Overview of Personal data being processed under 7.1 is

- necessary to enter into a contract: data marked as such in the column 'Necessary';
- optional to enter into a contract: data marked as such in the column 'Optional';

Processing basis	Privacy Act	Privacy Regulation	Identifier
1. Consent (general as well as or for special categories of personal data)	5, a) - 7, §2, a)	6(1)	C
2. Precontractual actions and performance of a contract or agreement	5, b)	6(2)	A
3. Legal obligation	5, c)	6(3)	LO

¹ ● yes
○ potentially, if the circumstances occur
- no

- 2.2 This Renson My Lio Installer Privacy Notice is provided to You in accordance with article 9 et seq. Privacy Act and article 13 et seq. Privacy Regulation.

- 2.3 The Privacy notice may be amended without prior notice. However, if these changes relate to personal data already collected and processed by the Data Controller, then these changes will be communicated to the Data Subject prior to the processing. It is advisable to view the Privacy notice on every entry of personal data.

3. Age of the Data Subject

- 3.1 If the Data Subject has not reached the age of 16, his/her consent must be given or authorised by the holder of parental responsibility.

4. Legal basis

- 4.1 Referrals in this Renson My Lio Installer Privacy Notice to the Privacy Act are valid until May 24th, 2018.

- 4.2 Referrals in this Renson My Lio Installer Privacy Notice to the Privacy Regulation are valid from May 25th, 2018 and onwards.

- 4.3 The articles D.18 and D.20 will come into effect as from May 25th, 2018.

B. Identity and Communication with Renson

5. Identity of Renson

- 5.1 For the purposes of data processing, the following entity must be regarded as the Data Controller in accordance with the Privacy Act and the Privacy Regulation:

- Renson Ventilation NV
- with its registered office at Industriezone 2 Vijverdam, Maalbeekstraat 10, B-8790 Waregem,
- entered in the K.B.O. under number 0462.152.837

6. Communication with Renson

- 6.1 You can reach Renson via Customer Service:

- Address: Industriezone 2 Vijverdam, Maalbeekstraat 10, B-8790 Waregem;
- Tel.: +32 56 62 71 11;
- Email: info@renson.be ;
- Web: www.renson.eu ;
- For more privacy-related information: www.renson.eu/privacy

C. Data Processing

7. Processed data

- 7.1 When using Renson My Lio Installer Application, Renson will process the following data:

- 9.3 The consequences of failure to provide personal data that is an optional requirement are:

- Diminished sales service (presales or after sale): 'DSS'
- No individualized proposals or advertisement: 'NIP'
- Limited functionality: 'LIM'

10. Data collection

- 10.1 The Data referred to in art. 7 is collected:
- Directly with You, through the Renson My Lio Installer;

11. Legal basis for data processing

- 11.1 As a data controller, Renson may only process Your personal data on basis of:

² Not applicable since this data is necessary to enter into a contract, and thus must be provided by the Data Subject.

4. Vital interests of the data subject	5, d)	6(4)	VI
5. Public interest or official authority	5, e)	6(5)	PI
6. Legitimate interests pursued by the controller or by a Third Party	5, f)	6(6)	LIC
Opt-in for direct marketing	-	-	DM

Table 3 Overview of processing basis

11.2 The actual basis for the data processing by Renson is set out in Table 4. Overview of Processing purposes .

12. Purposes of processing

12.1 Renson will process Your personal data for the following purposes:

Processing purpose	Identifier	Legal basis ³	Storage Period	
			Contractual	Non-contractual
Communication with the user	COM	LO, C	-	Life span user account
Optimization-improvement and optimization of Renson My Lio Installer	OPT	LIC	-	Life span user account
Compliance with data protection legislation	DPC	LO, LIC	-	Life span user account
Services - Renson Connected App services	SERV	C, A	-	Life span user account
Support - giving online or remote support by Renson or one of its independent installers	SUP	C, A	-	Life span user account
Technical purposes	TR	C, A	-	Life span user account

Table 4. Overview of Processing purposes

12.2 The lawfulness of the personal data processed by Renson is whether or not partially based on the legitimate interests pursued by Renson or by a Third Party ('LIC'). These legal interests pursued by Renson or Third Party are:

- Compliance with data protection legislation (DPC)
 - Renson's right to process data with a view to the correct application of the Privacy Regulation;
- Product and Installation Registration
 - Renson's right to monitor data on the operation of installed products and the execution of the installation, in order to respond to poor or suboptimal performance;; including recalling devices, detecting system failure for future maintenance, future repairs, product optimization, handling of warranty cases, etc.
- Optimization

- Renson's right to process short-term data from its products with a view to product optimization and improvement;
- Technical purposes
 - The right of Renson to process device data for purely technical purposes

13. Existence of automated decision-making or profiling

13.1 The Application does not process data for purposes of automated decision-making.

14. Recipients and categories of recipients of the data

14.1 Depending on the purpose of and need for processing, the processed personal data may be made known to the following recipients:

(Category of) Recipients	Applicable ⁴	Condition/purpose	Identity of Recipient(s) ⁵
External Service Providers			
Development Company	●	Application Development; only for testing purposes by a limited number of developers	LoQutus, PegusApps
Website hosting provider	●	Hosting Your account on our Website and processing Your purchase	Sentia, Combell
Other Third Parties			
Installers	○	In the context of diagnosis, maintenance and repairs, subject to the consent of the person concerned	-

Table 5. Categories of Recipients

14.2 The aforementioned recipients will always process the received personal data in accordance with this Privacy notice.

15. Period of data storage

15.1 When storing your personal data, Renson takes into account multiple data storage periods. The exact storage period for each processing purpose is specified in Table 4. Overview of Processing purposes.

D. Your rights as a data subject

16. Access

16.1 The Data Subject is entitled to information about the processing of data performed by Renson. To the extent that the information can not be found in this Renson My Lio Installer Privacy Notice, he/she can always contact Renson through the coordinates in art Error! Reference source not found..

17. Rectification

17.1 The data subject shall have the right to obtain from Renson without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

18. Data portability

18.1 You have the right, within the boundaries of the Privacy Regulation, to receive the personal data which You provided to Renson, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Renson without hindrance from Renson, where the processing is based on

- Your consent, or on
- The performance of a contract to which You are a party or Your requests prior to entering into a contract, and the processing is carried out by automated means.

18.2 In exercising Your right to data portability pursuant to paragraph 18.1, You shall have the right to have the personal data transmitted directly from one Renson to another, where technically feasible.

19. Withdrawal of consent

19.1 If the processing of Data is based on Your consent, You have the right to withdraw Your consent at any time, especially but not limited to the processing of special categories of personal data in accordance with art. 8.1.

19.2 Any withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal nor the lawfulness of processing on another legal basis, as e.g. the performance of a contract to which You are a party.

20. Restriction

20.1 You have the right to obtain from Renson a restriction of processing where one of the following applies:

- You contest the accuracy of the personal data, for a period enabling Renson to verify the accuracy of the personal data;
- the processing is unlawful and You oppose to the erasure of the personal data, and You request the restriction of their use instead;
- Renson no longer needs the personal data for the purposes of the processing, but You require them for the establishment, exercise or defense of legal claims;
- You object to processing pursuant to article 21.1, pending the verification whether the legitimate grounds of Renson override those of the data subject.

20.2 Where processing has been restricted under paragraph 20.1, such personal data shall, with the exception of storage, only be processed with Your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

20.3 If You would have obtained a restriction of processing pursuant to this article, You shall be informed by Renson before the restriction of processing is lifted.

21. Objection

21.1 Under the circumstances described in article 12, §1, of the Privacy Act and article 21(1) Privacy Regulation, You have the right to object, on grounds relating to Your particular situation, at any time to processing of Your personal data based on Your consent or on the legitimate interests pursued by Renson or by a Third Party, including profiling based on those provisions.

21.2 Renson shall no longer process the personal data unless Renson demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of You or the establishment, exercise or defence of legal claims.

21.3 Where personal data are processed for direct marketing purposes, You have the right to object at any time to processing of Your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

22. Erasure ('right to be forgotten')

22.1 You have the right to obtain from Renson the erasure of personal data concerning Yourself without undue delay and Renson shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw Your consent on which the processing is based according to article 19.1, and where there is no other legal ground for the processing;
- You object to the processing pursuant to article 21.1;

³ see column 'Identifier' in art. 10

⁴ Idem as under footnote 1

⁵ If know or if this concerns a regular/recurring recipient

- Your personal data has been unlawfully processed;
- Your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which Renson is subject;
- Your personal data has been collected in relation to the offer of information society services directly to a child.

23. Exercise of rights by the data subject

23.1 To exercise any of the rights stated in this article, the User may contact Renson by means of

- a postmarked and signed request;
- an email;
- a request through our webform.

The communication coordinates of Renson can be found in article 6.1.

23.2 The information will be made known to the User without delay and in all instances not later than one month after receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Renson shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

23.3 Any communication or any actions taken under articles 16 to 22 shall be provided free of charge. In performance of art. 16.1, Renson shall provide a copy of the personal data undergoing processing, free of charge. For any further copies requested by the data subject, Renson may charge a reasonable fee based on administrative costs.

23.4 Where You make a request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

23.5 Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, Renson may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- refuse to act on the request.

23.6 Where Renson has reasonable doubts concerning the identity of the natural person making the request referred to in articles 16 to 22, Renson may request the provision of additional information necessary to confirm the identity of the data subject.

E. Transfers of personal data

24. Location of processing

24.1 Unless otherwise stated, Your personal data will be processed in the Country of the registered offices of Renson (see art. 5) or another location within the European Union.

25. Transfer to third countries or international organisations

25.1 There will be no transfer of your personal data outside the European Union.

26. Appropriate or suitable safeguards for data transfers

26.1 In view of articles 24 and 25 of this Renson My Lio Installer Privacy Notice, there is no need for appropriate or suitable safeguards for data transfers to third countries or international organisations.

F. Complaints

27. Complaint handling by Renson

27.1 If You wish to file a complaint, You can do so through the communication channels provided in art. 6.1.

27.2 Renson shall provide You information on action taken on a request under section D, *Your rights as a data subject* of this Renson My Lio Installer Privacy Notice without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Renson shall inform You of any such extension within one month of receipt of the request, together with the reasons for the delay.

27.3 If Renson does not take action on Your request, Renson shall inform You without delay and at the latest within one month of receipt of Your request, of the reasons for not taking action.

28. Filing a complaint with a supervisory authority

28.1 If You consider that the processing of Your Data infringes the Privacy Regulation or Privacy Act and without prejudice to any other administrative or judicial remedy, You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of Your habitual residence, place of work or place of the alleged infringement.

28.2 The supervisory authority of Your habitual residence can be found here: <https://secure.edps.europa.eu/EDPSWEB/>

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