

Privacy Policy

Last Update: 19.09.2024

1. Introduction and Purpose

Wintegritty is committed to maintaining the privacy and security of your personal data in full compliance with the General Data Protection Regulation (GDPR) 2016/679. This privacy policy outlines how we collect, process, and protect your personal information, particularly in the context of the events, trainings, conferences we propose (collectively our “events”).

The expressions “User”, “you”/“your” in this Privacy Policy shall mean any person accessing the Wintegritty website, participating to Wintegritty’s events or about whom we collect and use any information in the course of providing our services.

As the Data Controller, Wintegritty is responsible for determining the purposes and means of processing personal data in compliance with the General Data Protection Regulation (GDPR). Any questions regarding the processing of your personal data or your rights can be directed to hello@wintegritty.eu.

2. How do we collect and use your data?

Hereafter, we distinguish four types of data processing, and for each situation, we explain the data being processed, how we collect it, the purposes for which it is used, and the legal basis that permits us to process it.

A. Event participation management

What data do we collect?

If you participate in a Wintegritty event as a participant or if you are the contact person for the client or within the employer, we may collect the following information:

- Identification details: Name, surname, title, preferred language.
- Contact details: Email address, phone number, postal address.
- Professional information: role, company name.
- Event Participation Data: date and type of the events, feedback, dietary requirements for catering.
- Financial Data (if relevant): Payment information, bank details.

How do we collect this data?

We obtain this data either directly from you when you register personally or through ongoing communications, or from your employer when they handle your registration. The data provided may be enriched with publicly available sources (e.g., your website, social network as LinkedIn).

For what purposes?

In the context of event participation, we collect and process personal data for the purpose of "Event participation management," which includes invitations, registration, delivering services related to event participation, and related direct mailings, such as sending confirmations, event reminders, and post-event follow-ups.

For certain events, the participants receive a simplified list of participants with the surnames, first names, positions and organisations of the participants.

What authorizes us to process this data?

The legal basis for this processing is **contractual necessity**: Processing is necessary for the performance of a contract, such as registering you for one of our events or delivering services related to event participation.

General atmosphere photos and participant images

During certain events, general atmosphere photos and participant images may be taken to illustrate and promote the activities and mission of Wintegrity. These images may be used in our communication materials, including on our website and social media platforms. The legal basis for this processing is **legitimate interest**, as it supports the promotion of our events and aligns with our mission.

If you prefer not to appear in any photos, you can inform us beforehand, and we will take the necessary steps to respect your privacy.

B. Speaker participation management

What data do we collect?

If you participate as a speaker, the section "A. Event participation management" applies to you. In addition, we may collect the following additional data:

- Additional visual identity elements (photo).
- Additional professional information (e.g. curriculum vitae).

How do we collect this data?

Most of the time, you or one of your representative will be the one providing us with this information. The data provided may be enriched with publicly available sources (e.g., your (employer) website, social networks as, for example, LinkedIn).

What authorizes us to process this data?

The legal basis for the processing if these additional data is **contractual necessity**: Processing is necessary to ensure proper coordination and performance of your role as a speaker, including promotion of the event (website, mailing, social networks, invitation paper), assess and sharing your expertise, and ensuring a successful event experience for all participants.

For certain specific training programs, Wintegrity also has a **legal obligation** to verify that you possess the adequate expertise and skills.

A. Marketing and event invitation purposes

We may use your data to invite you, as a client or past participant, to our upcoming events, particularly when these events align with the topics or services you have previously shown interest in or participated in.

What data do we collect?

We may collect the following data for marketing and event invitation purposes:

- Identification details: Name, surname, title, preferred language.
- Contact details: Email address, phone number, postal address.
- Professional data: Role, company name.
- Event Participation Data (if applicable): Date and type of the events

For what purposes? And what authorizes us to process this data?

The legal basis for this processing is our **legitimate interest** in promoting our services and keeping you informed about events that may be of interest to you based on your past participation or industry relevance. Our legitimate interest include our entrepreneurial freedom.

If you are not yet a client or if you haven't participated yet to one of our events, you are considered a prospect, and we will seek your **consent** before sending marketing communications. This last status of prospect requires the absence of any relationship with Wintegrity.

How can you adapt your preferences or op-out?

We want to make sure you're only receiving the information that's useful and relevant to you. If you want to adapt your preferences or if you'd prefer not to receive our updates or event invitations anymore, you can easily opt out at any time by:

- Clicking the "unsubscribe" link at the bottom of any of our emails.
- Reaching out to us directly at hello@wintegrity.eu .

Once we receive your request, we'll promptly stop sending you these communications. We respect your decision and won't be offended.

B. Compliance with Legal Obligations

Wintegritty is required to process certain personal data to comply with various legal obligations. This includes processing your data for purposes such as fulfilling tax obligations, cooperation with governmental and regulatory bodies, legal requests related to the prevention of fraud or other unlawful activities or ensuring compliance with relevant laws and regulations applicable to our operations.

What kind of data may be shared?

In this context, the personal data we may process includes, but is not limited to, identification and contact details, financial information and event participation records.

What authorizes us to process this data?

The Legal basis for such processing is based on the need to comply with a **legal obligation** to which Wintegritty is subject.

3. Lawful Basis for Processing

We only process your personal data based on one of the following legal grounds as per Article 6 of the GDPR:

- Contractual Necessity: Processing is necessary for the performance of a contract.
- Legitimate Interests: Processing is necessary for Wintegritty's legitimate interests, such as improving our services, ensuring that our activities align with your expectations. This processing includes our entrepreneurial freedom and is always done in line with your rights and freedoms.
- Consent: Where you have provided explicit consent for specific purposes.
- Legal Obligation: Processing is necessary for compliance with legal obligations.

4. Data Sharing and Third Parties

We may share your data with the following parties under strict confidentiality agreements and to the extent necessary:

- Third-party Service Providers: we may share your data with third-party service providers who assist us in delivering our services, such as event organizers, IT providers, accountant, payment processors.
- Event Partners: For collaborative events, we may share your details with co-organizers or sponsors, but only to the extent necessary and for the purposes related to these specific events.
- Legal Compliance: We may disclose your personal data when required by law or in response to a legitimate request from a government or regulatory authority.

- With Your Consent: If we need to share your data for any other purpose, we will seek your explicit consent.

5. Retention Period

We retain your personal data only as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law. For example, for certain continuing education programs, we are required to demonstrate to the authorities that you have participated in the training.

Wintegritty retains your personal data for up to 10 years following the end of the contract relationship. After this period, your data will be securely deleted or anonymized.

For marketing purposes, we will keep your contact data as long as you remain subscribed to our communications. You can unsubscribe at any time by following the instructions in each email or by contact us directly at hello@wintegritty.eu.

6. Data Security

We take technical and administrative precautions to protect your data from destruction, loss, modification or any un-authorized processing. These measures for protecting personal data will regularly be adjusted to the technical developments and organizational changes. In this respect, the people who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information. However, we cannot guarantee its safety against all types of fraud or misuse, and we cannot verify its total security against all types of interception.

7. Data Subject Rights

Wintegritty wants to ensure that you remain in control of how we use your personal data. We therefore remind you of the following rights:

1. Right to be Informed – This information is provided to you in this privacy notice and any other notices or communications that we may send you or make available to you.
2. Right of Access – as a data subject, you can request copies of your personal data that we process, free of charge, unless the request is excessive or there is a valid exemption.
3. Right to Rectification– You may request that we correct or complete data that you believe is inaccurate or incomplete about you.
4. Right to Erasure – We may have an overriding legal basis or legitimate reason to continue to process your personal data, however, where we do not have a valid lawful basis, you may request erasure of your personal data that we process.
5. Right to Restrict Processing – You have the right to request that we stop processing your data any further. This right may be exercised where you contest the accuracy of the data, claim that it is unlawful for us to process it, we no longer require the data other than for legal purposes or that there is a pending decision on a right to object.

6. Right to Object – Where processing is based on one of our legitimate interests, you may exercise your right to object to such right to object to such processing. We will then balance your interests against ours interests to determine which should prevail and to see whether any additional measures can or should be taken to restore the balance.

You can exercise your rights by contacting us at hello@wintegrity.eu.

If you send us a request, we will respond to your request as soon as possible, but in any case, within 30 days. If necessary, this period can be extended by one months, given the complexity and the number of requests. If there is reasonable doubt about your identity, we may ask you for proof of identity.

In addition to the rights expressly granted to you by the regulations, you can always submit other requests to us.

We are committed to working with you to find a solution if you have a complaint or problem with the way we process your personal data. If you are of the opinion that we have not been able to help you with your complaint or problem, you are also always entitled to submit a complaint to the Data Protection Authority (contact@apd-gba.be - (02) 274 48 00 – Rue de la Presse 35 Drukpersstraat, 1000 Brussels).

8. Changes to the Privacy Notice

We may have to adapt the Privacy Policy to ensure that its contents accurately reflect regulatory changes as well as changes that may occur at Wintegrity. By reading this notice and visiting the site, you agree and understand that you will not be personally notified when this Policy changes. We advise you to frequently review our Policy so that they remain aware of its updates.

When we update this policy, we will change the date behind 'Last updated' at the top of the policy.

In case of important or substantial changes in the policy or in the way Wintegrity uses your personal data, we will notify you of these changes either by posting a notice before they come into effect or by sending you a notification directly.

9. Cookies

We use cookies to improve the functionality of our website and enhance your experience. These include:

- Strictly necessary technical cookies: Essential for the operation of our website.
 - Analytic cookies: Help us understand how visitors use our site to improve performance.
- You can control your cookie settings at any time through your browser settings.

For more information about cookies and the list of cookies, see our Cookie Policy available at the bottom of each Wintegrity's website page.

10. Data Controller and Contact Information

The Data controller have its registered office at Avenue des Eperviers 117/16 Sperwerlaan 1150 Brussels and is registered with the Belgian Crossroads Bank for Enterprises under number 0799.166.469.

For any questions related to the protection of your personal data or to exercise your rights under GDPR, please contact us by post or by email at hello@wintegrity.eu.