



#### > General characteristics

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Rules relating to the protection of personal data of natural persons acting as contacts, directors or shareholders of our clients, prospective clients, partners, suppliers and debtors.

#### > Table of Contents

1		Why have a personal data protection charter?	2
2		Glossary of terms used in this Charter	2
3		Who controls the use of your personal data?	3
4		Why do we collect your personal data and on what grounds?	4
5		What personal data do we collect about you?	5
6		Who do we share your personal data with?	7
7		Do we exploit your personal data?	7
8		How long do we keep your personal data for?	8
9		What rights do you have regarding your personal data and how can you exercise them?	8
ŧ	a.	Right of access	8
ı	b.	Right to rectification	9
(	c.	Right to erasure of data (right to be forgotten)	9
(	d.	Right to object	10
(	e.	Right to data portability	11
1	f.	Right to restriction of processing	12
10		Are your personal data sent abroad?	13
11 co		Would you like to contact us about this personal data protection charter and/or to make a plaint to a data protection authority?	13
12		How will you know if this personal data protection charter has been amended?	14



### 1 Why have a personal data protection charter?

#### **Preamble**

Protecting your data is a priority for Credendo – Short-Term Non-EU Risks (hereinafter referred to as 'Credendo STN or 'we'/'us'). In this regard, we undertake to respect the personal data of natural persons acting as contacts, directors or shareholders of our Clients, Prospective clients, Partners, Suppliers and Debtors (hereinafter referred to as 'You'), to process them with the greatest care and to provide the best level of protection for them in accordance with Regulation (EU) No 2016/679 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 (hereinafter referred to as the 'GDPR') and the Belgian national regulations applicable.

This charter provides information on the protection and processing of your data within Credendo STN:

- 1. the personal data that we collect about You and the reasons for this;
- 2. the methods of use of your personal data,
- 3. your rights regarding your personal data and the means of exercising.

## 2 Glossary of terms used in this Charter

#### Glossary of the main legal terms used in this Charter

Terms frequently used in this Charter	Definition provided for by the GDPR	Explanation of the terms in plain language
Personal data (hereinafter referred to as 'personal data')	Any information relating to an identified or identifiable natural person ('data subject'); an 'identifiable natural person' is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.	All types of information relating to a natural person, i.e. an individual (You) who can be identified, directly or indirectly, as a person different from other people.  For example, a name, photo, fingerprint, e-mail address, telephone number, social security number, etc.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or	Any use of personal data, regardless of the process used (recording, organising, storing, amending, aligning with other data, transmitting, etc. of personal data).  For example: the use of your data for contact details management purposes, sending newsletters, etc.



	combination, restriction, erasure or destruction.	
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.	The person, public authority, company or body that controls your data and decides on any use of these data. It is the controller who decides to create or delete data processing and determines why your data will be processed and to whom they will be sent. The controller is the main party responsible for ensuring the legal protection of your data.
Processor	The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	Any natural or legal person who carries out processing tasks as instructed by and under the responsibility of the controller.

#### Glossary of other terms used in this Charter:

Client	A company that has already entered into a service contract with us
Prospective client	A company that may be interested in entering into a service contract with us.
Debtor	A company or self-employed person having a business relationship with our Client or Prospective client, including the guarantor of such company or self-employed person.
Partner	Any person who may take action with a view to facilitating our Clients' activities (banks, insurers, reinsurers, professional organisations, embassies, national and international institutions, academic world, etc.).
Supplier	Any company that supplies goods and/or services to us within the framework of our activities (including lawyers, brokers, consultants, etc.).

# 3 Who controls the use of your personal data?

Controller The Controller responsible for the processing of your personal data is Credendo STN, the head office of which is at Rue Montoyerstraat, 3 - 1000 Brussels, Belgium, registered in the BCE [Crossroads Bank for Enterprises] under no. 0867.435.663.

Any questions or requests relating to the processing of your personal data can be sent to the following e-mail address: credendodataprotection@credendo.com.

Appointment of a person responsible for the protection of your personal data Credendo STN has appointed its compliance officer, Geert Goossens, as the person responsible for the protection of your personal data.

He is, in particular, independently responsible for ensuring that the rules for the protection and management of your data are applied internally and for collaborating with the supervisory authorities.

His contact details are as follows: Mr Geert Goossens Rue Montoyerstraat, 3 1000 Brussels





Belgium

E-mail: credendodataprotection@credendo.com

## 4 Why do we collect your personal data and on what grounds?

We collect personal data about You for different reasons.

Credendo STN collects and uses your data to function effectively and to provide you with the best experience with its services.

We can only collect and use your personal data if this use is based on one of the legal grounds determined by the GDPR (for example, the performance of a contract entered into with You, our legitimate interest in processing data relating to contact persons, a legal obligation).

The table below identifies the exact purposes for the use of your personal data by Credendo STN and the corresponding legal grounds.

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Purposes of the collection of your personal data	Legal grounds for the processing of your personal data
Management of the Client and Prospective client relationship	The legitimate interest of Credendo STN to collect and process data relating to the contact persons, directors and shareholders of the organisations of its Clients and Prospective clients as part of the negotiation and/or performance of its contractual services, the need to negotiate and/or perform this contract and the required 'know your customer' checks, to comply with our legal obligations to perform antifraud, anti-corruption, anti-money laundering and international-sanction checks, and to perform the statistical and market analyses (Article 6.1.f) and b) of the GDPR).
Management of disputes and disputed facts/events (with our Clients, Partners and Suppliers)	The legitimate interest of Credendo STN to collect and process data relating to the contact persons, directors and shareholders within the organisations of its Clients, Partners and Suppliers with a view to managing a dispute or disputed facts/events or obtain a legal advice and the need to perform the disputed contract (Article 6.1.f) and b) of the GDPR).
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients, Prospective clients, Partners and Suppliers.	The legitimate interest of Credendo STN to collect and process data relating to contact persons, directors and shareholders within the organisations of its Clients, Prospective Clients, Partners and Suppliers with a view to offering them services and products, and providing them with information about its activities and evaluating their satisfaction.  Your consent is sometimes required by specific rules relating to e-mail advertising (Article XII. 13(1) Code of Economic Law; the Royal Decree of 4 April 2003).





Putting Credendo clients and Partners in contact with a view to facilitating our Clients' activities	The legitimate interest of Credendo STN to collect and process data relating to the contact persons, directors and shareholders within the organisations of its Partners and Clients with a view to putting them in contact (Article 6.1.f), GDPR).
Management of Suppliers	The legitimate interest of Credendo STN to collect and process data relating to the contact persons, directors and shareholders within the organisations of its Suppliers and the need to negotiate and/or perform the contract with your company (Article 6.1.f) and b), GDPR).
Underwriting purposes with regard to Debtors	The legitimate interest of Credendo STN as a credit insurance provider to collect and process data relating to contact persons, directors or shareholders of the organisation of the Debtor in order to perform our credit insurance business activities, namely to assess and analyse insurance risks at the request of our Clients, to comply with our legal obligations to perform anti-fraud, anti-corruption, anti-money laundering and international-sanction checks, and to perform the statistical and market analyses (Article 6.1.f) and c) of the GDPR).
Claims handling with regard to Debtors	The legitimate interest of Credendo STN as a credit insurance provider to collect and process data relating to contact persons, directors or shareholders of the organisation of the Debtor, in order to handle legal claims, debt collection and litigation (Article 6.1.f) and b) of the GDPR).

# 5 What personal data do we collect about you?

Please be aware first of all that the personal data that we collect about you depend on the nature and number of relationships that you have with Credendo STN, whether they are of a legal nature (e.g. entering into of a contract, legal obligation, legitimate interest) or not (e.g. visit to our website).

Provided below are the details of the personal data that we collect, the reason we collect them, and the way in which they are collected (directly or indirectly).

Purposes of data collection	Personal data collected	Direct or indirect collection of your personal data
Management of the Client and Prospective client relationship	Personal identification data (business e-mail address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual or pre-contractual relationship (content of e-mails sent or received by the contact person, information contained in meeting minutes, etc.).  Personal identification data regarding the directors or shareholders of the Client: name, contact information, date of birth, position, mapping of shareholdership.	
Management of         Identification data of contact         Within the context of this		Within the context of this



disputes and disputed facts/events (with our Clients, Partners and Suppliers)	persons, directors and shareholders (business e-mail address, business telephone number, title, etc.) and any other information in connection with the intervention of these persons in the disputed facts/events.	purpose, the data are collected directly from You, received from another entity within Credendo or from third parties.
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients, Prospective clients, Partners and Suppliers.	Data of the contact persons, directors and shareholders within the organisations of Clients, Prospective clients, Partners and Suppliers (business e-mail address, business telephone number, title, etc.).	Within the context of this purpose, the data are collected directly from You or from another entity in the Credendo group. Certain pieces of data may also be obtained from third parties with a view to controlling or enriching certain items of data (e.g. Trends-Tendances, Roularta). These third parties must guarantee that they have collected such data legitimately.
Putting Credendo Clients and Partners in contact with a view to facilitating our Clients' activities	Identification data of the contact person (business e-mail address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual relationship.	Within the context of this purpose, the data are collected directly from You or indirectly via third parties.
Management of Suppliers	Identification data of contact persons (business e-mail address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual relationship.	Within the context of this purpose, the data are collected directly from You.
Underwriting purposes with regard to Debtors	For contact persons: identification data such as name, business email address, business telephone number, position.  For directors and shareholders of these organisations and selfemployed persons: identification data, as well as the mandates in or control of other organisations,  In case the Debtor is a selfemployed person, this may also include financial information, trade registration numbers, claims details, payment history and bank account details.	The data may be collected directly from our Client or Prospective client, from other entities within Credendo, from public sources or from information and data providers.





	We may also have potential judicial data as a result of the screening performed.	
Claims handling with regard to Debtors	For contact persons: identification data such as name, business email address, business telephone number, position.  For directors and shareholders of these organisations: identification data, as well as the mandates in or control of other organisations,  In case the Debtor is a selfemployed person, this may also include financial information, trade registration numbers, claims details, payment history and bank account details.  We may also have potential judicial data as a result of the screening performed.	The data may be collected directly from our Client or Prospective client, from other entities within Credendo, from public sources or from information and data providers.

## 6 Who do we share your personal data with?

We may share your personal data as part of our activities. Of course, we always do so in a way that will ensure optimal protection of your personal data.

- > With other entities within Credendo to allow them to offer your company their specific services and to provide you with information about their activities or to perform underwriting services in relation to a credit insurance policy.
- > With certain sub-contractors such as suppliers of certain IT applications or marketing or communication bureaux to allow our business relationships to be managed in the best possible way.
- > With our Suppliers and Partners, typical in the insurance sector, such as reinsurers, lawyers, etc. for the requirements of the contractual relationship with them or for the management of claims, disputes and other litigation, if applicable, etc.
- > With public authorities, in response to legal requests, including to meet national security requirements or for the application of the law (such as, for example, the NSSO [National Social Security Office], the tax authorities, the supervisory authorities, etc.).
- > **As part of a transaction,** such as a merger, acquisition, consolidation or sale of assets, we may be required to share your personal data with the buyers or sellers.

# 7 Do we exploit your personal data?

We do not exploit your personal data.



## 8 How long do we keep your personal data for?

Credendo STN has set out precise rules concerning the duration for which your personal data are kept. This duration varies according to the different purposes and must take account of any legal obligations on keeping some of your data.

You will find below a list of purposes and the periods for which the data are kept:

Purpose of the processing	Period for which the data are kept
Management of the Client and Prospective client relationship	10 years from the end of the contractual relationship or 5 years from the end of the negotiation.
Management of disputes and disputed facts/events (with our Clients and Suppliers)	10 years from the end of the disputed events or facts
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients, Prospective clients, Partners and Suppliers	5 years, unless a contract is entered into in the meantime
Putting Credendo Clients and Partners in contact with a view to facilitating our Clients' activities	5 years, unless a contract is entered into in the meantime
Management of Suppliers	10 years from the end of the contractual relationship or 5 years from the end of the negotiation.
Underwriting purposes with regard to Debtors	5 years from the end of the last approved credit limit on this Debtor.
Claims handling with regard to Debtors	5 years from the end of the settlement of the last claim or dispute.

# 9 What rights do you have regarding your personal data and how can you exercise them?

We would like to inform you as clearly as possibly of your rights with regard to your personal data.

We would also like you to be able to exercise them easily.

You will find below a summary of your rights with a description of how to exercise them.

### a. Right of access

### > You can access all of the following information regarding:

- The categories of personal data that we collect about You;
- The reasons why we use these data;



- The categories of persons to whom your personal data have been or will be communicated and in particular persons based outside Europe;
- The duration for which your personal data will be kept in our systems;
- Your right to ask us to correct or delete your personal data or to limit the use that we make of your personal data, and your right to oppose such use;
- Your right to make a complaint to a European data protection authority;
- Information concerning their source when we have not collected your personal data directly from You;
- The way in which your personal data are protected when they are transferred to countries outside Europe.

#### > How can you exercise your right of access?

To do so, simply contact us by e-mail at *credendodataprotection* @*credendo.com*, with the subject 'right of access: personal data', along with a brief description of the information you would like to access, and attach a copy of the front of your ID card. The copy will be destroyed after carrying out the request. Unless you indicate otherwise, you will receive a copy of the information requested free of charge in electronic format within one (1) month following receipt of the request or two (2) more months if the request necessitates further research.

If you do not manage to access your information by e-mail, you can send us your request by post to the address below: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Written requests must be signed and accompanied by a copy of the front of your ID card. The copy will be destroyed after carrying out the request. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests.

### b. Right to rectification

> You can ask Credendo STN to correct and/or update your personal data.

#### > How can you exercise your right to rectification?

Simply send us an e-mail at *credendodataprotection* @*credendo.com*, indicating your full name and in the subject field 'right to rectification: personal data', with a copy of your ID card. Remember to also indicate the reason for this request in the body of your e-mail: rectification of inaccurate information, and the information to be amended with evidence of the correct information, if you have it and if applicable.

You can also exercise this right by writing to us at the following address: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Your written request must be signed and accompanied by a copy of your ID card. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests.

### c. Right to erasure of data (right to be forgotten)



- > You can also contact us at any time to ask us to erase the personal data that we are processing about you, if one of the following situations applies to you:
  - Your personal data are no longer necessary as the reasons for which they were collected or processed are no longer valid;
  - You have withdrawn your consent, which is the basis for Credendo STN to process your personal data;
  - For your own reasons, you believe that one of the instances of processing your data is infringing on your privacy and causing you excessive damage;
  - You no longer wish to receive commercial proposals from us;
  - Your personal data are not being processed in accordance with the GDPR and the applicable national regulations;
  - Your personal data must be erased to comply with a legal obligation provided for by European Union law or by Belgian national law to which Credendo STN is subject;

#### > How can you exercise your right to erasure?

Simply send an e-mail to *credendodataprotection* @*credendo.com*, indicating your full name and in the subject field 'Right to erasure of data: personal data', and attach a copy of the front of your ID card. The copy will be destroyed after carrying out the request. Remember to also indicate the reason for this request in the body of your e-mail (for example, erasure of your data when you have withdrawn your consent (which is the basis on which the data is processed).

You can also exercise this right by writing to us at the following address: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Your written request must be signed and accompanied by a photocopy of the front of your ID card. The copy will be destroyed after carrying out the request. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests.

However, we may not be able to accede to your request for the right to be forgotten. Indeed, it must be borne in mind that this right is not absolute. We must balance it with other rights or important values such as freedom of speech, fulfilment of a legal obligation to which we are subject or important reasons of public interest.

### d. Right to object

> Generally, the applicable legislation gives you the right to object, at any time for a reason particular to you, to the processing of your personal data. Indeed, if you believe that such processing is infringing on your privacy and/or causing you excessive damage, you may use this right.

You can, in particular, object to the use of your personal data for marketing purposes (cf. above) and, in particular, e-mail advertising.

However, under no circumstances may you prevent us from processing your data:

- if such processing is necessary for the entering into or performance of your contract;
- if such processing is required by law or by a regulation;
- if such processing is required to record, exercise or defend the rights in court.
- > How can you exercise your right to object?



Simply send an e-mail to *credendodataprotection* @*credendo.com*, indicating in the subject field 'Right to object: personal data', and attach a copy of the front of your ID card. The copy will be destroyed after carrying out the request.

It is important to indicate the reasons behind your objection request.

You can also exercise this right by writing to us at the following address: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Your written request must be signed and accompanied by a photocopy of the front of your ID card. The copy will be destroyed after carrying out the request. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests.

However, we may not be able to accede to your request. If this is the case, we will of course make sure that we provide you with as clear a response as possible.

### e. Right to data portability

- > With this right you will have the chance to control your personal data yourself more easily and, more precisely, to:
  - recover your personal data, which are being processed by us, for your personal use and to store them on a device or in private cloud storage, for example.
  - transfer your personal data from us to another company, either by you or directly by us, provided that a direct transfer is 'technically possible'.

This right concerns your data that have been actively and knowingly declared, such as the data provided to create your online account (e.g. e-mail address, user name, age), and the information collected by Credendo STN.

Conversely, the personal data that are derived, calculated or inferred from the data that you have provided are excluded from the right to data portability if they were created by Credendo STN.

#### How can you exercise your right to data portability?

Simply send an e-mail to *credendodataprotection* @credendo.com indicating your full name and in the subject field 'Right to data portability: personal data', and attach a copy of the front of your ID card. The copy will be destroyed after carrying out the request. Remember to specify in your e-mail the files concerned and the type of request (return of data and/or transfer to a new service provider).

You can also exercise this right by writing to us at the following address: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Your written request must be signed and accompanied by a photocopy of the front of your ID card. The copy will be destroyed after carrying out the request. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests.



However, please be aware that Credendo STN is entitled to refuse your request for data portability. Indeed, this right only applies to personal data based on your consent or the performance of a contract entered into with you (to find out the exact personal data that may be subject to the right to data portability: click on the purposes and grounds part).

Likewise, this right must not harm the rights and freedoms of third parties whose data may be contained in the data sent following a request for portability.

### f. Right to restriction of processing

> You have the right to ask us to restrict the processing, which involves the tagging (for example, temporarily moving your data to another processing system or locking your data, making them inaccessible) of your personal data, in order to restrict their further processing.

You may exercise this right when

The accuracy of the personal data is contested

The processing is unlawful, meaning it is not processed according to the GDPR and Belgian law

The personal data is no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

The decision regarding your objection to the processing is pending

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence 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

In case of restriction of processing of some of your personal data, we will keep you informed before the restriction of processing is lifted.

#### > How can you exercise your right to restriction of processing?

Simply send an e-mail to *credendodataprotection@credendo.com* indicating in the subject field 'Right to restriction of processing: personal data', and attach a copy of the front of your ID card. The copy will be destroyed after carrying out the request.

It is important to indicate the reasons behind your restriction request.

You can also exercise this right by writing to us at the following address: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

Your written request must be signed and accompanied by a photocopy of the front of your ID card. The copy will be destroyed after carrying out the request. The request must specify the address to which the response should be sent.

A response will then be sent to you within one (1) month following receipt of the request or two (2) more months if the request necessitates further research or if Credendo STN receives a very high number of requests. If your request is not clear or does not contain everything to allow us to proceed with the operations requested, we will ask you, within this time frame, to provide us with them.



### 10 Are your personal data sent abroad?



#### Transfer of data within Europe

As indicated in question 6, your personal data may be shared with the entities within Credendo or with certain subcontractors, Partners or Suppliers.



#### Transfer of data outside Europe

As indicated in question 6, your personal data may be shared with other entities within Credendo or with certain subcontractors, Partners or Suppliers, some of which may be established outside the EU.

Please be aware that privacy protection and the rules allowing the authorities to access your personal data in these countries are not necessarily the same as those in Europe.

In order to ensure that you have a high level of requirement in terms of data and privacy protection, we impose technical and legal guarantees on all our subcontractors, partners, subsidiaries, etc.

Your data is transferred to Russia and to the United States of America in accordance with article 46 of the GDPR through the conclusion of standard contractual clauses.

To obtain more information and/or a copy of the guarantees taken, you can send an e-mail to credendodataprotection@credendo.com by indicating your name, first name and in the subject 'transfers outside EU: personal data information'. Do not forget to also specify in the body of your e-mail the exact information which you wish to obtain.

- 11 Would you like to contact us about this personal data protection charter and/or to make a complaint to a data protection authority?
- Do you have any questions or suggestions regarding this personal data protection charter?

Please do not hesitate to contact us

- by e-mail at the following address: credendodataprotection@credendo.com
- by post to: Credendo STN, FAO: M. Geert GOOSSENS, Rue Montoyerstraat, 3, 1000 Brussels, Belgium.

We would be happy to hear from you and we will reply to you as soon as we can.



#### > Do you think that we are not doing enough to protect your personal data?

If you believe that Credendo STN is not processing your personal data in accordance with the GDPR and with the applicable Belgian legislation, you have the right to make a claim to:

- The data protection authority in the European country in which you normally reside; or
- The data protection authority in the European country in which you work; or
- The data protection authority in the European country in which the breach of the GDPR occurred.

### > Make a complaint to the Belgian data protection authority,

By post:

Autorité belge de Protection des données [Belgian data protection authority] Rue de la Presse, 35, 1000 Brussels

- By e-mail: contact@apd-gba.be

#### > Make a complaint to another European data protection authority

To make a complaint to another data protection authority, please consult the list on the European Commission website: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\_id=612080

# 12 How will you know if this personal data protection charter has been amended?

- > The personal data protection charter may be amended at any time, in particular to take account of any legislative or regulatory amendments.
  - Notification of any amendments made will be given by e-mail or via our website.
- > When we publish amendments to this Charter, we will revise the 'last update' date at the top of the privacy policy and we will give a description of the changes in the 'Change History' tab.

Please consult this Charter regularly to see how Credendo STN is protecting your personal data.

#### > Change history

Version	Date	Revision description
1.00 Final	25/05/2018	Initial version
2.0	24/07/2018	Addition of two purposes of processing, as well as additional clarifications for better alignment of the GDPR principles with internal business practices
2.1	12/12/2018	The copy of the ID card will be destroyed after carrying out the request to exercise the specific rights.