

What is it all about?

The processing of your personal data by the companies Rossel & Cie S.A., Groupe Sudmédia S.A., Groupe VLAN S.A., their subsidiaries, and sub-subsidiaries (hereinafter referred to as the "ROSSEL Group", "we" or "us") is governed by the General Data Protection Regulation (aka GDPR) 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. The regulation came into effect on 24 May 2016 and became applicable on 25 May 2018.

Since its inception, our media group has always managed the personal data of, initially, its readers, and subsequently, also of its website users, in a reasonable manner, justified by the journalistic, administrative, and commercial purposes of its activities and for limited periods of time. Over time, our media group has put procedures in place to secure its databases and the personal data they contain.

Our goal is to build on this achievement so that you continue to trust us to manage your personal data respectfully, while leaving you in control.

What type of personal data are we talking about? About the data relating to you the ROSSEL Group collects and the manner in which we use these data. In that context, all the people working for the legal entities of the ROSSEL Group who collect personal data are called "data controllers".

On our website, we also use cookies. To learn more about this, go to one of our group sites and click on the "MANAGE COOKIES" link at the bottom of the page and check out our [Cookie Policy](#).

What personal data do we store and where do they come from?

Our privacy policy is dictated by the relationship we have with you, in particular when:

- You create a user and/or customer account in the context of a customer-supplier relationship to avail of our products and services, for consideration or free of charge. By creating your account, whether or not you subscribe to one of our subscription packages in return for payment, you avail of one of our services. In that case you will receive access (the level of which will depend on whether or not you have a subscription) to information, and to newsletters that offer you free and/or paid content that may be of interest to you and which you are free to unsubscribe from at any time;
- If you have subscribed to a physical or digital publication;
- If you purchase a product or service, in particular in the context of a combined offer;
- If you take part in a competition or any other special business transaction;
- If you subscribe to and/or identify yourself on our websites and mobile applications;
- If you contact our customer service;
- If you subscribe to our newsletters;
- If you provide us, by any other means or in any other context, with data relating to you and you can reasonably expect that we will process these data to get back to you or for any other compatible purpose.

On that basis, we inter alia collect and process the following data: your surname, first names, subscriber numbers, shipping address, IP address, email address, bank account number, other personal

financial or banking details if you are paying by direct debit or by credit card (in that case we will share your personal data with the latter who must also provide all the relevant guarantees that your data are protected).

These personal data will be retained for as long as required for the purposes of the processing.

You may also be asked to consent to us using your personal data for other purposes to receive other information from us or from one of our business partners.

Furthermore, once you create an account, you consent to us collecting and recording information relating to you, in particular as regards your use of our platforms and any communication tools, digital or otherwise. We also collect this type of information by means of cookies and Web beacons that are stored on your device. This information may include demographic data, data about your fields of interest and data about your browsing behaviour on our platforms. These data are used to complete your profile, to supply you with editorial content (in particular via newsletters), including commercial offers tailored to your interests.

If you use a social media-related functionality on our website or applications and post comments on these social media, the social network in question will share your personal data with us.

If we knowingly need to collect personal data about minors under the age of 15, we will always need the consent of the person who has parental authority to validate them. If you decide to create an account on our websites or applications, you certify that you over the age of 15.

Why and how do we use your personal data?

<p>To manage our precontractual relationship with potential customers</p> <p><i>We process your personal data to reply to enquiries and/or questions you send us (in particular via the contact form on our website)</i></p>	<p>We have a legitimate interest in processing personal data of potential customers once they allow us to reply to their enquiries and/or questions (Article 6.1.f) GDPR). The processing may also be required to take steps prior to entering into a contract with you (Article 6.1.b) GDPR).</p>
<p>For marketing purposes among our customers and non-customers, i.e.:</p> <ul style="list-style-type: none"> • <i>to send you newsletters and special offers;</i> • <i>to send you newsletters, special offers and other communications tailored to your profile (in particular when you browse our website);</i> • <i>to send you requests to take part in customer satisfaction surveys</i> • <i>to post Rossel ads on third-party websites and applications, including on the social media and advertising networks</i> 	<p>We have a legitimate interest in processing your personal data (in particular those obtained in the context of the sale of a product but also those obtained when you create an account without a paid subscription) to inform you of any products and special offers that may be of interest to you and to foster customer loyalty/recommit you to our brand, via third-party websites and applications, the social networks and advertising networks included.</p> <p>In accordance with the law and subject to your consent, we process personal electronic data of non-customers to inform them about products and special offers that may be of interest to them.</p> <p>To offer you the most relevant experience</p>

	possible, our teams may personalise your emails, your browsing experience, and other communications on condition that we received your explicit prior consent (Articles 6.1.a) and 9.2.a) GDPR). To do so, we analyse your orders and/or interaction with our teams.
<p>To organise competitions</p> <p><i>Rosset processes the data of people who take part in competitions to ensure that the competition runs smoothly, in particular to contact winners and present them with their prize efficiently and without undue delay.</i></p>	To perform a contract we concluded with you (Article 6.1.b) GDPR), in this instance a contract to take part in a competition.
To send out press releases	We have a legitimate interest in processing the personal data of journalists to send them and publish press releases (Article 6.1.f) GDPR).
To send out notifications	<p>To perform a contract we concluded with you (Article 6.1.b) GDPR).</p> <p>We have a legitimate interest in collecting and using your personal data in the context of sending out notifications on current topics you expressed an interest in or which we feel may be of interest to you (Article 6.1.f) GDPR).</p>
<p>To manage a file of contact persons for the purpose of running influence marketing campaigns</p> <p><i>We compile and use a file of bloggers and influencers' addresses to develop and enhance our brand image, to boost our visibility, etc.</i></p>	We have a legitimate interest in processing these personal data for the purpose of developing and boosting our brand image (Article 6.1.f) GDPR).
<p>Customer administration</p> <p><i>We process personal data for customer administration purposes, in particular: to create accounts, to take out or renew a subscription, to enter into and perform contracts, for invoicing and accounting purposes and, in particular, to manage customer accounts, to keep a list of persons we reserve the right to refuse an order from or with whom we ended our business relationship, in accordance with our terms of business.</i></p>	To perform a contract we concluded with you (Article 6.1.b) GDPR).
<p>Order management</p> <p><i>All the information you, as our customer, provided us with while entering data inherent to your order, are</i></p>	<p>To perform a contract we concluded with you (Article 6.1.b) GDPR).</p> <p>We have a legitimate interest in collecting</p>

<i>inter alia necessary to follow-up our relationship and for payment purposes, if applicable.</i>	and using your personal data in the context of fraud management (Article 6.1.f) GDPR).
To manage people's opinions on products, services, or content	We have a legitimate interest in processing personal data about notices published on our website if they allow us to identify the strengths and weaknesses of products, services, and content we offer (Article 6.1.f) GDPR).
To monitor customer relations <i>We process your personal data inter alia to conduct customer satisfaction surveys, to manage your complaints and in the context of our after-sales service.</i>	To perform a contract we concluded with you (Article 6.1.b) GDPR). We have a legitimate (business) interest in collecting and using your personal data with a view to measuring and guaranteeing customer satisfaction (Article 6.1.f) GDPR).
Dispute management	To perform a contract we concluded with you (Article 6.1.b) GDPR). We also have a legitimate interest in processing your personal data to defend our interests, in particular, though not exclusively so, in the context of a dispute or a legal action (Article 6.1.f) GDPR)
Statistics <i>"Statistical purposes" means any collection and processing operation of personal data needed for statistical surveys or to produce statistical results. These statistical results can also be used for different purposes, inter alia to improve our websites, products, and services. Statistical purposes implies that the result of any processing for statistical purposes does not allow the persons whose information has been used to be identified.</i>	We have a legitimate interest in processing your personal data to improve our websites and the products and services we offer and to gain a better understanding of our target audience (Article 6.1.f) GDPR)
The acquisition of new customers targeted because of their resemblance to existing customers.	We have a legitimate interest in asking third-party service providers, including the social media, or advertising networks, to look among their customers or members for leads targeted on the basis of their resemblance to our customers, to show them ads for Rossel, subject to the appropriate guarantees being respected.
The sale of related products <i>We may offer our customers and non-customers products that are related to Rossel's mission of providing information or that are likely to foster the creation of a community (travel, goodies, free or payable events, textile products, etc.)</i>	To perform a contract we concluded with you (Article 6.1.b) GDPR), in this instance the sale of a related product or to register for an event and to follow up its organisation.

	We have a legitimate interest in fostering loyalty among our customers or in creating a community of customers and non-customers.
To comply with the law	In certain cases, we are obliged by law to process data or to communicate them to third parties, for instance upon judicial requisition.
Geolocation We may geotag connections, in particular to offer or show local news.	To perform a contract we concluded with you (Article 6.1.b) GDPR). We have a legitimate interest in offering our readers a personalised experience, at a geographical level included, subject to the appropriate guarantees being respected.
To defend our rights	To monitor the proper performance of a contract we concluded with you (Article 6.1.b) GDPR). We have a legitimate interest in preventing or detecting all types of fraud, all crimes or offences, or any illegitimate use of our networks, of our physical or digital services, and in ensuring the security of our activities and those of our Partners, Recipients or Processors, and in protecting our intellectual property rights (brands, content, etc.) or those of our Partners, Recipients or Processors.

Do we share your personal data? With whom and why?

We share your personal data with the legal entities of the ROSSEL-LA VOIX Group.

In the context of the afore-described purposes for which we use your personal data, we entrust certain processing operations to third parties known us “processors”. In certain cases, we may also share your personal data with service providers and/or business and contract partners who may intervene in the context of the aforementioned processing operations.

These partners may include: providers of email solutions, customer support solutions, database management solutions, online payment solutions, delivery services, social networks, and providers of solutions to optimise the social media’s strategy, online gambling and/or competition service providers, system and infrastructure maintenance, including application maintenance, service providers, hosting services, survey organisers, advertising network partners, partners who either or not organise events and special offers, including any other third parties involved in a sale or a service provided. Subject to your prior consent, we use your data for the benefit of our partners.

If we do not need to share these data to perform a contract with you or to take steps at your request prior to entering into a contract with you, or if they are not required to comply with a legal obligation incumbent on us or in the context of the pursuit of our (or a third party’s) legitimate interests and your interests or fundamental rights and freedoms do not take precedence, we will ask for your consent.

In response to demands of a legal nature, to meet national security or legal requirements included, inter alia to prevent and detect criminal offences, we are likely to communicate your data: a) at the request of a judicial authority, the police or court officers or an administrative authority; or b) in good faith and in the belief that this is required to comply with the applicable legislation or regulations; c) to protect and defend our rights or those of others who use our services.

In the context of a transaction involving one of our companies (such as a merger, acquisition, consolidation, or a sale of assets), we may have to share your personal data with the buyers or sellers.

Insofar as is reasonably possible, we store your data within the European Union and ask our processors and partners to do likewise. If data are transferred outside of the European Union to a country that does not offer an adequate level of protection, we use the protection mechanisms permitted under the GDPR or will ask you for your consent.

We choose processors who adequately guarantee that they implement the appropriate technical and organisational measures to ensure that the processing of your personal data meets the requirements of the GDPR and guarantee that your rights are protected in accordance with this charter. Our processors are bound by subcontracting agreements that provide for the appropriate guarantees.

Your Rights

The General Data Protection Regulation has strengthened your rights in terms of managing your personal data. There are a number of rights you can exercise:

- the right to access your personal data, i.e. the right to obtain (i) confirmation that the data are used and (ii) communication of the data that are used and were/will be communicated to Recipients;
- the right to withdraw your consent to use your personal data, whether in part or in full;
- the right to have any personal data that are inaccurate or incomplete rectified or completed;
- the right to have your personal data erased if they are no longer used, have been used illegitimately or if you have withdrawn your consent;
- the right to lodge a complaint with the Belgian Data Protection Authority <https://www.autoriteprotectiondonnees.be/>;
- the right to data portability which entails the right to ask that your personal data are transmitted to you personally or to another data controller to enable the latter to provide you with its services;
- the right to limit the use of your personal data.

Furthermore, the law stipulates that articles 7 to 10, 11.2, 13 to 16, 18 to 20 and 21.1 of the GDPR do not apply to the processing of personal data carried out for journalistic purposes; articles 30.4, 31, 33 and 36 of the GDPR do not apply to the processing of personal data for journalistic purposes if their application would compromise a planned publication or constitute a control measure prior to the publication of an article; articles 44 to 50 of the GDPR do not apply to the transfer of personal data for journalistic purposes to third countries or international organisations insofar as this is necessary to reconcile the right to privacy with the right to freedom of expression and information; article 58 of the GDPR does not apply to the processing of personal data for journalistic purposes if its application would provide indications about the information sources or constitute a control measure prior to the publication of an article.

To exercise any one of these rights, please email your request to dpo@rossel.be, making sure to enter all the relevant information required to exercise each of the rights concerned.

Even though we examine each request we receive meticulously, we must:

- be able to authenticate applicants precisely. Data controllers have put an authentication process in place to help them ascertain that the applicant is also the person whom the request relates to. This requirement should not pose any problems if you need an account to connect. However, in the event of doubt about the applicant's identity, the data controller is obliged to ask for additional information;
- be given enough time to respond. Your request will be processed without undue delay and at the latest within one month of the request having been received. For more complex requests, this period may be extended by two months;
- be permitted to refuse requests that are unfounded or excessive. Certain requests may be subject to a fee.

Exceptions to your rights associated with our journalistic activities

The right to be forgotten provided for in the GDPR does not apply if the processing is required to exercise the right to freedom of expression and information.

Furthermore, the law stipulates that the provisions of § 5 of article 4, of articles 6, 46, 48, 49, 50, 53, 118, 119 and those of Chapter 5 of the GDPR do not apply, in cases where such a derogation is required to reconcile the right to privacy with the right to freedom of expression and information, to the processing of personal data for professional purposes, for journalistic purposes, with due regard for the profession's code of ethics.

These derogations take precedence over all other provisions of this charter.

The security of your personal data

We have put the necessary administrative, technical, and physical measures in place to protect your personal data against unauthorised access, accidental loss, accidental or unlawful destruction or unauthorised alteration and also update these measures on a continuous basis. Some of the measures we use to protect your personal data are firewalls and data encryption, including personal data access controls.

We only store your personal data for the time it takes to process them in the context of providing you with the service you have requested in accordance with their intended use and the legal purposes which require us to retain these data. We securely delete your personal data if they are no longer required for any of the aforesaid purposes.

Amendments to our Privacy Policy

We reserve the right to amend this Privacy Policy to ensure that it is at all times consistent with the applicable data protection legislation or to adapt it to our practices. As a result, we ask you to regularly check this Privacy Policy for any changes that may have been made. New versions will always be uploaded to our website and the effective date will always be updated. In the event of any major changes, we will also ask you to agree to these changes.

How to contact us?

For further details about our Privacy Policy, or in the event of questions in relation to this Privacy Policy, please feel free to contact our Data Protection Officer (DPO) by email at dpo@rossel.be