

Privacy Policy

With this Privacy Policy, we aim to provide you with the necessary information on our data processing activities, and hereby comply with the applicable provisions of the Belgian Act of December 8, 1992 on the protection of your privacy in relation to the processing of personal data (hereinafter “Privacy Act”), which implemented the EU Data Protection Directive 95/46, as well as with the requirements under the EU General Data Protection Regulation 2016/679 of 27 April 2016.

1. Personal Data

The provision of personalized web services requires us to, at several locations of our websites, collect and process your personal data (e.g. when you fill in your name and email address in our ‘Contact’ section). Personal data is every type of data that allows the direct or indirect identification of a natural person. This collection is done via electronic forms that you fill in voluntarily when e.g. requesting information about a product or service or when subscribing to a newsletter. To ensure confidence in our services and a good relationship with the visitors of our websites, this Privacy Policy informs you of the type, the extent of, and the purposes for which personal data are collected and used.

2. Data Controllers and Processors

The Data Controller is defined under the Privacy Act as the natural or legal person which alone or jointly with others determines the purposes and means of the processing of personal data. The data controller of the websites is:

G.C. Europe N.V.
Researchpark Haasrode-Leuven 1240
Interleuvenlaan 33
3001 Leuven
Belgium

We may send your personal data to third parties whose intervention as data processor, on behalf and under control of GC EUROPE N.V. (hereinafter GC EUROPE), is required for the purposes indicated below. These data processors are natural persons or legal entities that process the personal data on behalf of GC EUROPE. We have carefully chosen these processors. The selected processors satisfy all the requirements of Article 16, §1 Privacy Act and offer all the adequate guarantees with regard to technical and organizational security measures regarding the processing of your personal data.

We shall further ensure the confidentiality of the (personal) data and shall prevent any re-use of your personal data by any third party (processor).

When there is a legal obligation to do so, we may disclose your information to any relevant regulatory body. When you submit a question or request to GC EUROPE via our websites (including but not limited to a question via our ‘Contact’ section, a subscription request to our newsletter, a sample request on our sample page(s), or a registration request for one of our online webinars), GC EUROPE will forward this question or request and the personal information provided by that internet user to the company within the GC group located or operational in the internet user's country of residence. In these circumstances, personal data are thus not only processed by GC EUROPE, or under the sole control of GC EUROPE, but also by its affiliated

companies and/or subsidiaries. If you oppose this transfer, you can contact us by email at DataprotectionCommittee.gce@gc.dental or by post at the aforementioned address to the attention of the Data Protection Committee.

We ensure that your personal data will not be rented nor sold in personally identifiable form to anyone but companies within the GC Group, or the trusted and reputable third party processors described under this title. All third party processors are bound to keep your information confidential. All information provided to third party processors is used by them only to carry out the service they are providing for us.

3. Types of personal data

While processing your requests, or answering your questions, we will process the personal data you provide us with. For each request or question, specific personal data is necessary to finalize the request or answer the question. We take the data minimization principle seriously, and therefore aim to only process personal data through our websites which is strictly necessary to provide you with the service you requested. If you refuse to disclose certain personal data that is essential for GC EUROPE, affiliated companies and/or its subsidiaries, it is possible that we will not be able to handle your request or answer your question. An example in this context: we will always need your name and delivery address to be able to send you the sample you request. If you are not willing to disclose this information, we will not be able to finalize your request for a sample.

4. Purposes of Processing

The processing and storage of your personal data is performed by GC EUROPE solely for the following purposes:

- The processing of your requests for information on our products and services.
- The processing of your personal data to provide you with the goods or services you requested through one of our websites (e.g. samples).
- The processing of your personal data to comply with a legal obligation to which we are subject;
- The use of your personal data for our demographic studies, together with non-personal data to monitor customer patterns so we can consistently improve our site design to better meet our visitor's needs. We may collate information about site traffic, sales and other commercial information.
- The processing of your personal data to help us ensure the proper technical functioning of the websites and to provide you access to the websites in a secure, effective and user-related manner.
- The processing of personal information to send you marketing updates (e.g. newsletters, promotions, ...) after obtaining a free, specific, informed and unambiguous consent for this purpose. Please note that you can revoke your consent at any time with effect for the future towards us (GC EUROPE) or your local GC entity via post, e-mail or by clicking the unsubscribe button in direct mails.

We only process your personal data as long as necessary to ensure a proper customer relations management. We ensure that we will delete your personal data as soon as this data is no longer required for the purposes above, or, if applicable, for as long as the legal retention period lasts. Do take into account

that your personal data can be stored for more than one of the purposes as explained above, and that the retention period for the different purposes can differ.

5. Your Rights as a Data Subject

You can be assured that your personal data will be processed in a fair and lawful manner. Personal data will only be processed for the aforementioned legitimate purposes. We ensure that the personal data we process is always adequate, relevant and not excessive in relation to the purposes for which they are processed.

You have the right to access and restrict the data pertaining to you and processed by GC EUROPE. This right includes, but is not limited to, access to information on the purposes of the processing, the categories of information processed and the categories of recipients to whom the data are provided.

Where appropriate, you can request rectification of any erroneous data relating to you personally.

You may furthermore, at any moment, object, by means of a simple request and free of charge, to the future processing of personal data relating to you, or to the future processing of any affiliated company or subsidiary of your personal data. This right to object exists only if there are sufficient grounds relating to your particular situation. The exceptions provided in the Privacy Act are also applicable to this right of objection.

You also reserve the right to obtain the removal of your personal data which have been obtained and which are incomplete or irrelevant, taking into account the purpose of the processing. This is also applicable to any personal data of which the storage, disclosure, and retention are prohibited, or personal data stored after expiry of the authorized period. This right can be used without further justification.

You may exercise these rights of access, rectification, objection or deletion by contacting us by email at DataprotectionCommittee.gce@gc.dental or by post at the aforementioned address to the attention of the Data Protection Committee, mentioning your full name and address and attaching a copy of your ID (the photo on this ID can be made unrecognizable). After confirming your identity, we undertake the appropriate, legally compliant action following a request within fifteen (15) working days from the moment we receive the request. If the identification details you provided us with are not sufficient to safely and with certainty identify you, we will contact you to receive additional information proving your identity. If you would have any further questions or complaints, you can use the same addresses to contact us. You can equally file a complaint with the Belgian Data Protection Authority.

6. Data Transfer

In order to further develop our business, we may alter the corporate structure of GC EUROPE by changing its legal form. We may also form, sell or buy subsidiaries, divisions or parts of the company. During such transactions, customer and visitor information can be passed on to an affiliated company, subsidiary or branch within the GC Group. Every time such an internal data transfer occurs, GC EUROPE will ensure that this is done in accordance with this Privacy Policy and the (at any given time) current applicable laws.

All transfers to countries outside the European Union will follow the applicable European and national rules on data transfer and will be based either on an adequacy decision of the EU, or a contract between GC

EUROPE and the company located outside the European Union, which will ensure an appropriate level of security during the data transfer.

7. Security

GC EUROPE uses a number of technical and organizational security measures (e.g. encryption of data, access control to our physical offices etc.) to assure the integrity and confidentiality of your personal data. GC EUROPE has implemented security technologies to protect the stored data from unauthorized access, improper use, alteration, unlawful or accidental destruction and accidental loss.

8. Children under the age of 16

Not yet 16? Please ask your parents for permission to use our websites and connect with us through our websites. Redirect your parents to this Privacy Policy.

9. Miscellaneous

Our websites contain links to other websites not owned or operated by GC EUROPE. Please be aware that GC EUROPE is not responsible for the privacy and/or cookie practices of these websites and that this Privacy Policy applies solely to personal data collected through or by our websites.

Finally, we reserve the right to change, modify, add or remove this Privacy Policy or parts of it at any time. Therefore, we recommend you to consult this Privacy Policy for modifications on a regular basis. By using the Websites after having modified this Privacy Policy, we presume you have agreed to accept these modifications. The last date of modification will always be mentioned in this Privacy Policy.

If you have any questions or concerns regarding this Privacy Policy, please do not hesitate to contact us by email on DataprotectionCommittee.gce@gc.dental. If you prefer to contact us via postal mail, you can use the address mentioned under part 2, to the attention of the Data Protection Committee.

This Privacy Policy was last modified on April 17th, 2018.