

Privacy Statement

The current Privacy Statement (hereinafter referred to as “**Statement**”) applies to any person (hereafter referred to as “**you**”) who will use Vaigo’s smart mobility platform.

Eurides BVBA (hereafter referred to as “**Eurides**” or “**we**”) having its registered office at Appelweg 62 – 3221 Holsbeek and registered at the Belgian Crossroads Bank of Enterprises under company number 0568.470.181., through this Statement, would like to inform you why and how we collect and process your personal data on behalf of the controller, which is your employer.

This Statement has been written by Eurides in order to provide as much transparency as possible to anyone who uses the Vaigo smart mobility platform (hereinafter referred to as “**the Vaigo platform**”) on which Eurides processes his/her personal data.

Eurides acts as an intermediary between its clients (your employer) and you, then end user, by offering a tool which enables its clients, especially services of human resources and mobility managers, to offer new, flexible mobility options to you. In these circumstances, Eurides processes your personal data for and on behalf of its clients (your employer) and shall be considered as a processor (see below point 1 of this Statement).

This Statement has been drawn up pursuant to and in accordance with Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons relating to the processing of personal data and on the free movement of those data (hereafter referred to as “**GDPR**”).

1. Definitions

For the purpose of this Statement, the following terms shall have the following meanings:

Personal Data: refer to an information relating to an identified or identifiable natural person (the data subject).

Processing: refers to any operation (or set of operations) which is performed on personal data. This may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data subject: refers to a person who can be identified or identified, directly or indirectly, by personal data.

Controller: refers to the natural or legal person, public authority, agency or other body which, alone or jointly, determines the purposes and means of the processing of personal data. In practice, your employer is the controller.

Processor: refers to a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. In practice, Eurides is the processor.

Third party: refers a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

GDPR: refers to the regulation (EU) 2016/679 of the European Parliament and of the Council of 26 April 2016 on the protection of individuals 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).

2. Controller vs. Processor

When using the Vaigo platform, Eurides acts as a processor, which means that, it collects and processes your personal data on behalf of its clients (your employer).

Your employer, as a controller, determines the purposes and the means for processing your personal data while we, as a processor, process your personal data for and on behalf of your employer, and under its instructions.

In order to frame our relationship, we have concluded what we call a Data Processing Agreement (DPA) between Eurides and your employer in accordance with the GDPR.

Should you want further information about the controller and/or its Data Protection Officer (hereafter refer to as “**DPO**”), we encourage you to directly contact your employer.

3. Subject of the Privacy Statement

This Statement applies to any person who uses the Vaigo platform as requested by your employer in order for your employer to facilitate the management of flexible mobility options within the company.

Through this Statement, we would like to be as transparent as possible and inform you about how we process your personal data when using the Vaigo platform; and as well as inform you that you can:

- retain control over the personal data that we process;
- exercise your rights regarding your personal data.

Please, note that this Statement only concerns the processing of your personal data performed via the use of the Vaigo platform.

Should you want further information about the processing of your personal data made by your employer, we encourage you to read your employer’s own privacy statement and/or request further information directly from your employer.

4. What kind of data do we collect about you?

4.1. Personal data

Personal data means all information relating to an identified or identifiable person.

In particular, we can collect the following categories of personal data **from your employer:**

- identifying data such as: surname, name, gender, employee ID number, etc.;

- contact details such as: your (work) email address, home address.
- information related to your role in the organization: job title, position, category.
- Information related to you mobility consumption allotment: mobility budget(s), employment percentage, work schedule etc.

Furthermore, we also collect the following categories of personal data **from the external service provider** (such as SNCB/NMBS, Uber, etc.) you use its service:

- identification data such as: surname, name,
- contact details such as: your email address, home address, phone number, etc.,
- financial information related to the services provided by these providers to you,
- location data;
- consumption data such as the information related to your mobility choice.

Moreover, we also collect the following categories of personal data directly from you when using the Vaigo platform:

- identification data such as: surname, name,
- contact details such as: your email address, home address, phone number,
- financial information related to mobility services usage,
- consumption data such as the information related to your mobility choice and self-reported usage data such as cycling distances.

When you request some services from external service providers (e.g. public transport operators like SNCB/NMBS), we may also collect directly from you the following categories of personal data:

- data concerning your family composition,
- ID national registration number,
- images such as your photo,
- car license plate

This information is requested by these public transport providers in order to provide some of their services. We shall ensure that we will only collect such personal data only if it is especially requested by the external service provider.

Finally, please be advised that the Vaigo platform also uses cookies which are necessary to make our platform work properly.

5. Purposes of the processing and legal basis

5.1. Flexible mobility choice within your company

Your personal data will be processed in the context of the implementation, by your employer of its mobility policy by:

- providing a platform which enables you to manage your own mobility services,
- easing the management within the company of the flexible mobility options proposed within the company,
- reimbursing your expenses linked to your mobility choice.

These personal data are processed in order for your employer to perform the work contract concluded with you.

5.2. Securing the Vaigo platform and making it function properly

We also process your IP address and information obtained via cookies installed in your browser in order to:

- enhance and secure our tools (we call them “system cookies”): they enable us to retain the information you provided while entering trips or other information in case a bug occurs. In this situation we will process these cookies based on our legitimate interest, which is to offer to every user an enhanced experience;
- for the tools to function properly (we call them “necessary cookies”). We will process these cookies based on our legitimate interest, which is to enable the tool to properly function.

5.3. Analytical purpose

Depending on what has been concluded with your employer, it may be possible that we perform analytical analyses of the mobility choices implemented within your company based on the legitimate interest of your employer to better comprehend and manage the mobility options chosen by its employees. This particular processing will only be performed on anonymised data.

5.4. Archiving purpose

Finally, we may also retain your personal data should we have a legal obligation to do, especially for tax and/or commercial archiving purposes.

6. Are these personal data necessary? What are the consequences of not providing them?

Depending on the service you will request, personal data may be required to provide our service and/or to facilitate the provision of external provider’s services (e.g. SNCB/NMBS, etc.).

If you do not provide these personal data, we will not be able to facilitate the management of your mobility-related expenses by your employer.

7. Who do we share your data with?

Your personal data will be processed for the sole purposes stated in point 5 of this Statement. Thus, they will be sent to your employer, especially to the HR, fleet- and mobility, payroll, finance and expense departments within your company.

Depending on the structure of your company, it may be possible that these services are externalised. In such a situation and depending on what has been concluded with your employer, it may be possible that we directly send your personal data to this external provider (e.g. social secretariat).

Moreover, we also share your personal data with the service provider you choose for your mobility when using the Vaigo platform.

Finally, we will only share your information if:

- your employer request and/or agree with it,
- it is necessary for us to comply with a legal obligation.

8. Are my personal data transferred outside the EU or EEA?

The personal data processed by us will not be transferred outside the European Union (EU), nor the European Economic Area (EEA).

However, and in any event, should this change, we will ensure that the minimum legal requirements and security standards are respected at all times. If we suspect that your personal data will be stored and processed outside the EU, we will explicitly inform you and your employer of this and ensure that the same level of protection is used as is applicable within the EU.

External service providers may store personal data outside of the EU or EEA. If this is the case, we will inform you about this when you are requesting the activation of the service. You will have the option to cancel the request.

9. How long are your personal data retained?

We do not keep your personal data longer than necessary to achieve the purposes mentioned in point 5 of this Statement.

Since the need to retain personal data depends on the type of personal data concerned and the purpose of the processing, the storage periods may vary considerably.

You will find below the criteria on which we base our definition of retention periods:

- have we defined a specific retention period with your employer?
- have we defined and announced a certain retention period?
- are we subject to a legal retention/archiving obligation, a contractual or equivalent obligation?

Concerning the cookies, they are retained, from the last active session, for two weeks.

We will delete your personal data when they are no longer required for the aforementioned purposes.

Should there be any personal data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to secure them by anonymizing them and/or by preventing any further processing or use of the data.

10. How are your personal data protected?

We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration or destruction unauthorized.

We require all our staff members, including employees, principals and independent collaborator to keep personal data confidential and only authorized staff members to have access to your personal data on a “need-to-know” basis.

Moreover, we only make use of suppliers which provide sufficient guarantees to implement adequate technical and organizational measures for protecting the personal data.

With regard to the security measures implemented by your employer, we invite you to read your employer's own privacy policy and/or to directly contact your employer.

11. What are your rights with regard to your personal data?

Below you will find an overview of your rights as a data subject.

However, we wish to draw attention to the fact that these rights are not absolute and may be subject to conditions.

Right to access your personal data

You have the right at all times to access and inspect your personal data processed by us. In this context, we will provide you with a free copy of your personal data.

Right to rectify your personal data

You have the right at all times to have incorrect, incomplete, inappropriate or outdated personal data erased, completed or rectified.

Right to have your personal data erased

You are entitled to have your personal data deleted. However, we may keep personal data if it is necessary for purposes of proof.

Right to object to certain processing

You are entitled at all times to object to processing for reasons relating to your specific situation. We and, when necessary, the controller will immediately cease processing your personal data unless compelling legitimate grounds are provided for processing that outweigh your interests, rights and freedoms or that relate to the establishment, exercise or defence of a legal claim.

Right to limit certain processing operations

You have the right to limit the processing of your personal data if:

- you dispute the accuracy of the personal data, for a period that allows you to verify whether the said data is accurate;
- if the processing is unlawful and you object to the erasure of your personal data, requesting that their use be limited instead;
- we and, where necessary, the controller no longer require your personal data for the processing purposes, but you still need them for the establishment, exercise or defence of a legal claim;
- you have objected to a processing operation, pending the answer to the question as to whether this objection is justified.

Right to transfer personal data

You have the right to request that personal data that you personally provided to us - in a structured, commonly used and digital form - be forwarded to you so that you can store them for

personal (re)use, or to forward such personal data directly to another data controller, to the extent that it is technically possible for us to do so.

However, the data protection legislation provides for a number of restrictions to this right, which means that it does not apply to all your personal data.

Right to lodge a complaint with the supervisory authority

If you are of the opinion that the processing of your personal data does not comply with the data protection legislation, you can lodge a complaint with the National Data Protection Authority (e.g. the Belgian Data Protection Authority in Belgium, the CNIL in France, etc.).

Right to manage cookies

Regardless of the kind of cookies put on your browser, you have the possibility to manage them at any time by using the following procedure.

However, we would like to draw your attention to the fact that by changing the settings of these cookies (for example: by refusing cookies), your navigation on Vaigo platform may be affected.

There are several ways of managing cookies, which are explained further below.

Through the browser that you use, you will be able to:

- see what kind of cookies you have on your computer's hardware and delete them;
- block third party cookies;
- block cookies from particular websites;
- block all cookies from being set;
- delete all cookies when you close your browser.

In order to understand how to do so in practice, since each browser may have a different procedure, we invite you to visit the dedicated pages on the browsers' site:

- [Internet Explorer](#),
- [Mozilla Firefox](#),
- [Chrome](#),
- [Safari](#).

12. How to exercise your rights?

To exercise the rights mentioned above you must request it directly to your employer which, if necessary, will ask us to answer it.

When exercising your right(s), we request that you clearly state the right to which you wish to appeal, any processing operation(s) you object to and/or wish to limit and the personal data you wish to delete/complete/modify.

Always be as specific as possible if you wish to exercise your rights, in order for us to be able to do the necessary.

These requests are free of charge, except when the request is manifestly unfounded or excessive (as in the case of a repeated request).

For any additional copy requested, we may also request payment of a reasonable fee based on administrative costs.

Your request will be processed within one month. This period of time may be extended by two months, taking into account such factors as the complexity and number of requests. In the event of an extension of the term, you will be informed of this as well as of the reasons for the extension.

13. How to submit questions or complaints?

If you have a question or complaint about our personal data processing or about this Statement, you can contact us in the following ways:

- by email: privacy@eurides.eu;
- in writing to the following postal address:

Eurides BVBA
Appelweg 62
3221 Holsbeek
Belgium

Moreover, we ask you to send a copy of this request to your employer if you deem it necessary.

We are committed to cooperate with you to obtain a fair resolution of any complaint or concern about privacy. However, should you believe that we or your employer have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the country in which you live using their website.

14. Amendments to this Statement

We may amend or supplement this Statement as we deem necessary.

If significant changes are made to this Statement, the date on which it is amended will be adjusted and we will also notify you accordingly and provide you with a copy of the amended Statement.

We also encourage you to periodically review this Statement, published on the Vaigo platform to find out how we process and protect your personal data.