

PRIVACY POLICY SMT AFRICA

English version – Date 22/05/2018 – Consultez la version française ci-dessus – Raadpleeg Nederlandse versie hierboven

The present document constitutes the privacy policy (the “Privacy Policy”) of SMT Africa, with registered office at Triomphe Building, Avenue Arnaud Fraiteur 15-23, Brussels, Belgium, company number 0415.894.032 (bank account : IBAN : BE52 2200 9923 8009, BIC : GEBABEBB) (hereafter « SMT »).

This Privacy Policy informs the visitor of the website <https://smt.network/> (the “Website”), operated by SMT, about how SMT processes the personal data collected or communicated by the visitor via the Website, and about how SMT processes the personal data collected or communicated by a person who contacted SMT spontaneous and directly (via e-mail or other).

1. Generalities

1.1. SMT is the controller of the personal data mentioned above and looks after the respect of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of the personal data and on the free movement of such data (the “GDPR”) or of any other rule of Community law or Member State laws related to the protection of personal data, in particular related to confidentiality and security of data.

1.2. The Website may contain links to other websites. This Privacy Policy is only applicable for this Website. If the visitor visits other websites, SMT recommends him to read the privacy policy of the other websites.

1.3. SMT reserves the right to adapt this Privacy Policy. The visitor shall regularly consult the applicable Privacy Policy at the moment he visits the Website.

2. Process of your personal data by SMT

2.1. SMT collects and processes your personal data when you visit the Website or because you disclose them (for example, via the contact form, contact form to apply for a job, or via an e-mail), or just because you use the Website.

2.2. The purposes of data processing: the processing of your personal data is based on different legal basis's depending on the circumstances.

1. When the visitor visits the Website: the legitimate interests of SMT (article 6.1.f of GDPR), in particular in order to improve our Website, the products and services offered, and, sometimes the consent of the data subject (article 6.1.a of GDPR);

2. When the visitor enters himself his details in a contact form and/or writes an email to SMT via the Website and/or contacts SMT directly via e-mail (or in another way): the legitimate interests of SMT (article 6.1.f of GDPR) and the consent of the data subject (article 6.1.a of GDPR);

3. When the visitor applies for a job through the Website (webpage “careers”) (or directly via e-mail (or other)): in order to take steps prior to entering into a contract (article 6.1.b of GDPR), the consent of the data subject (article 6.1.a of GDPR), the compliance, by SMT, with a legal

obligation (article 6.1.c of GDPR), the pursue by SMT of her legitimate interests (the normal course of business) (article 6.1.f of GDPR).

2.3 Collected data: depending on your use of the Website, SMT could potentially process following data:

Personal identification data (name, surname, address), electronic identification data (email address, phone number, cookies); personal details (date of birth, place of birth, gender, marital status, nationality and language knowledge), a valid work permit in Belgium; academic background; publications, information about the actual job, information about the recruitment, information about the end of the actual job; information about the career; information about the organization of work, remuneration data; assessments; pictures; data about security (like login and password); data about the hobbies and interests; data about your company; etc.

SMT does not request any special categories of personal data via the Website. Special categories of personal data include e.g. information about race or ethnic group, political preference, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We dissuade you from furnishing this type of particular personal data. Should you, however, supply such information for whatever reason, we assume that you explicitly grant SMT permission to process this information.

2.4. Scope of purpose : when you use the Website, or when you fill in a form online, SMT collects and processes your personal data for the following purposes:

- to manage its Website and to manage its (potential) clients;
- to manage the applications;
- to inform about new jobs.

2.5. The recipients: SMT may, if necessary to fulfil the purposes, use suppliers (for example, IT infrastructures, foreign servers), who could process personal data on instruction of SMT and on SMT's behalf.

Furthermore, SMT could share your data with other companies of the SMT group all around the world, depending on the circumstances, in order to ensure effective follow-up of the received applications, or in order to provide services to a prospect. In any case, it will communicate the applications it received to companies of the SMT group concerned by the application, and it will communicate the demand received from a prospect to the concerned company of the group.

When SMT uses suppliers, or transfers data to companies of its group, SMT commits that appropriate measures are in place in order to protect the confidentiality of the data and to guarantee their integrity and, when the suppliers are based outside the EEA, to ensure an adequate level of data protection (for example, by the execution of ad hoc stipulations).

In the case this is prescribed by law, or justified in the concrete circumstances, SMT is likely to communicate your personal data to the authorities in charge with the compliance with the rules (for example, the compliance with the rules on the protection of personal data, and more generally, the compliance with the laws (for example communication to the police)).

2.6. Right to withdraw your consent: When the processing is based on your consent, you have the right to withdraw your consent at any time, for free, by writing an email at the following address: privacy.africa@smt.network.

2.7. Right to request access, rectification, erasure, right to oppose and right of data portability:

In any case, you have the right to access your data and to rectify them if they are incorrect or incomplete, to obtain their erasure or limitation or, in cases specified by law, to oppose against the processing of your data. Furthermore, you have the right to receive the data that concerns you in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (right to data portability). To exercise these rights, you can send, for free, an email to following address: privacy.africa@smt.network.

2.8. Duration of the data retention: Your data will be retained by entitled persons for:

- 6 months as of the collection of the data, in the case of data collected to manage the Website and/or to improve the service by using the Website and/or by submitting a question via a contact form or directly;
- When a candidate fills in a registration form, sends a spontaneous application and/or completes his personal profile, his personal data will be conserved in a data base, managed by SMT, at least during the time it will be necessary to examine his candidature and during the recruitment process, and maximum during 2 years as of the communication of the candidature for the data processed for recruitment purposes.

2.9. Complaints: You can lodge a complaint with the Authority of data protection (Drukpersstraat 35, 1000 Brussels – contact@apd-gba.be).

3. Cookies

3.1. SMT uses cookies on its Website, i.e. small information files that are transferred to the visitor's computer hard drive and which is saved temporarily or definitively on the visitor's computer, by the server of a website, via the navigator. This information makes it possible to simplify, complete or personalize the use of the Website.

3.2. Insofar the cookies contain personal data, the visitor has the right to invoke his rights under the GDPR.

3. Contact

If you have any questions and/or complaints, please contact SMT at the following address: Triomphe Building, Avenue Arnaud Fraiteur 15-23, Brussels, Belgium or by email at following address: privacy.africa@smt.network.