



## V-BIO VENTURES POLICY ON DATA PROTECTION

### Identification of the controller

V-Bio Ventures entities (collectively "V-Bio Ventures") have been collecting personal data about you. V-Bio Ventures uses your personal data in compliance with the provisions under the European General Data Protection Regulation ("GDPR"), as amended from time to time (collectively "Regulation"). This Data Protection Policy ("Policy") explains how we use your personal data.

### What Personal Data do we collect?

"Personal Data" is any information relating to you or that we can otherwise link to you. The Personal Data we collect include your name, postal address, e-mail address, phone and fax number, company name, company structure, job title, and job function. In case of contractual agreements, the list of data points can be expanded on a case by case basis.

### How do we collect your Personal Data?

We collect personal data that you voluntarily provide to us, for example when

1. you enter into a contractual agreement with us
2. you exchange business cards with us
3. we have received your information through contacts in our corporate network
4. you subscribe to our newsletter and/or press releases
5. you communicate with us via e-mail or through post
6. you communicate with us in other ways

In some cases, your Personal Data has been supplemented by information retrieved from other sources, including searches via the internet (websites, social media, etc.) or sector-specific newsletters.

### How do we use your Personal Data?

We use the Personal Data we collect to fulfil contractual or regulatory obligations, for communication purposes and to maintain and expand our network, including:

1. to send you newsletters, press releases, updates and other information about V-Bio Ventures;
2. to send you invitations to events, calls, and meetings;
3. to maintain our list of contacts

We do not make your Personal Data available to any third party, except in cases where we are obliged to by the regulatory authorities or to service providers in a contractual relationship with V-Bio Ventures (so-called "processors") that we hire to process personal



data on our behalf. These companies perform technology maintenance services or work on our behalf to conduct business transactions, such as providing customer services and sending marketing communications about our products, services and offers. An example of such a processor that V-Bio Ventures uses is Campaign Monitor. Our processor Campaign Monitor is based in the United States. The international transfer of personal data is in accordance with the provisions of the GDPR. Campaign Monitor is compliant to GDPR and continues to regularly monitor and audit for compliance.

### **Why do we process your Personal Data and on what legal basis?**

As set out above, we process your Personal Data to fulfil our contractual and regulatory duties and for communication and networking purposes. We rely on our legitimate interests in maintaining business relationships and communicating with you as a business contact, about the V-Bio Ventures activities and events. We consider that our legitimate interests are in compliance with the Regulation and your legal rights and freedoms. Furthermore, in direct marketing emails, we also use certain pixels that collect information about the success of our campaigns. For example, they allow us to find out whether our emails are opened and whether certain links in the emails are clicked on. If we did not use this technique, we would not be able to find out whether recipients are interested in our message. The pixels thus allow us to improve our campaigns and make them more relevant to current and future prospects. In addition, this information is also used to stop sending messages to a prospect with whom no meaningful interaction has been established. We are transparent to data subjects about the processing of their personal data by adding a clear disclaimer in direct marketing emails, by providing a link to our Policy, and by providing a link to unsubscribe from direct marketing emails.

The legal basis on which we rely to send prospects direct marketing messages is our legitimate interest to contact prospects with offers relevant to them. The GDPR provides in recital 47 that "the processing of personal data for the purposes of direct marketing may be considered as carried out for the purposes of a legitimate interest."

The Belgian Data Protection Authority ("GBA") has also stated in its [guidelines on direct marketing](#) that this legal basis can be used in the context of prospecting when the impact on the privacy of the data subject is limited and the electronic direct marketing message is within the reasonable expectations of the prospect contacted. This position is explicitly confirmed on the [GBA website](#).

### **Where is your Personal Data stored?**

V-Bio Ventures operates entities in Belgium and relies on professional market-leading service providers for data handling and storage. We ensure that personal data are handled and stored at an appropriate level of data protection in accordance with the decision of the EU Commission.

### **How long do we keep your Personal Data?**

Your Personal Data will be saved for the specified purposes mentioned above for as long as you are a business contact to us or if we are obliged to by the regulator (whichever period is longer). You can opt-out at any time, if you no longer wish to receive communication from V-Bio Ventures. Should you have a request of the above nature, please contact us at [privacy@v-bio.ventures](mailto:privacy@v-bio.ventures).



## **Data Security**

V-Bio Ventures has implemented appropriate technical and organizational security measures to help protect your Personal Data against loss and to safeguard against access by unauthorized persons.

## **Your Rights**

You have the right to know what Personal Data we process about you and may request a copy. You are also entitled to have incorrect Personal Data about you corrected and you may in some cases ask us to delete your Personal Data. You can also object to certain Personal Data about you being processed and request that processing of your Personal Data be limited. Please note that the limitation or deletion of your Personal Data may not be possible, if that would cause V-Bio Ventures to violate contractual or regulatory obligations. Please also note that the limitation or deletion of your Personal Data may mean we will be unable to provide the communications described above. You also have the right to receive your Personal Data in a machine-readable format and have the data transferred to another party responsible for data processing.

You can always exercise the right to unsubscribe by clicking the unsubscribe link in the footer of the direct marketing e-mail. You have the right to obtain restriction of processing in certain situations, for example if you dispute the accuracy of personal data, for a period of time that allows V-Bio Ventures to verify the accuracy. You may exercise these rights by sending an email to [privacy@v-bio.ventures](mailto:privacy@v-bio.ventures). We will handle your request in accordance with applicable privacy laws.

In case of problems, we encourage you to contact us to reach an amicable agreement. However, if you consider that an amicable settlement is not possible or desirable, you may exercise your right to file a complaint with the Belgian Data Protection Authority: Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, e-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be).

If handling your request requires unreasonable measures (e.g. it is technically or organisationally virtually impossible or extremely costly), V-Bio Ventures may charge you a reasonable fee in light of the administrative costs involved in handling the request. We may also refuse to process requests that are excessive, in particular due to their repetitive nature.

## **How to contact us?**

If you have any questions about how we process your Personal Data, please feel free to contact us at [privacy@v-bio.ventures](mailto:privacy@v-bio.ventures).