

PRIVACY STATEMENT

We understand that your trust in us is the most important asset of The Sapphire Holding BV (hereinafter referred to as "The Sapphire Holding", "we" or "us"). Your privacy is therefore essential to us.

This privacy statement (hereinafter referred to as "Privacy Statement") applies, among other things, to

- (i) our websites <https://www.immowi.com/> and <https://www.immokantoor.be> (hereinafter referred to as the "Websites");*
- (ii) the landing pages prepared by The Sapphire Holding for the benefit of its project partners (hereinafter referred to as the "Landing Page"); and,*
- (iii) all (commercial) relationships between The Sapphire Holding, its prospects, project partners (or other customers), business partners and suppliers.*

This Privacy Statement contains, among other things, information about the personal data that The Sapphire Holding collects, as well as how The Sapphire Holding uses and processes these personal data.

The Sapphire Holding wishes to emphasise that it endeavours at all times to act in accordance with the "Privacy Laws", namely

- (i) the Belgian Privacy Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data;*
- (ii) EU Regulation 2016/679 of 27 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/E; and/or,*
- (iii) other privacy laws and regulations applicable to The Sapphire Holding.*

Please read this Privacy Statement in conjunction with The Sapphire Holding's legal disclaimer and cookie policy.

Services of The Sapphire Holding involving the processing of personal data

A. Under the name Immowi.com

The main activity of The Sapphire Holding, under the name **Immowi.com**, consists of lead generation for project partners. For this purpose she prepares Landing Pages, about the real estate projects of her project partners. The Landing Page contains more information about the property project (e.g. quantity of units, price range, type of units, etc.).

After building a Landing Page, parts (e.g. photos and/or articles) are converted into advertisements. These advertisements are placed on their website by The Sapphire Holding's marketing partners (e.g. Facebook, Google, etc.). The Sapphire Holding only sees the number of advertisements displayed on the marketing partners' websites and has no insight into the choices made by the marketing partner regarding the placement of the advertisement (e.g. where on the page).

After an advertisement is clicked on on the website of the marketing partner, the visitor will end up on the Landing Page. If - after viewing the Landing Page - the visitor is still interested in the real estate project, he/she can fill in his/her personal information in the contact form.

Sometimes certain contact details of the project partner can be found immediately on the Landing Page (e.g. the logo, the name of the project partner or the name of a contact person). In this case, the visitor may also contact the project partner directly with any questions or comments regarding privacy, as The Sapphire Holding and the project partner are jointly responsible for the visitor's collected personal data.

The Sapphire Holding will forward all fully and correctly completed contact forms to the project partner so that they can contact interested visitors to provide more information about the project, schedule a visit, etc.

In order to optimise its services in the future, Immowi will divide the personal data of interested parties into different categories (e.g. residential, industrial, luxury, etc.) depending on the type of property. This information will then be used to help (the algorithm of) the marketing partners advertise in a more targeted way in subsequent (similar) projects.

Immowi guarantees to pay special attention to the GDPR in all its forms of advertising (and/or when calling on marketing partners to advertise):

- **Transparency:** The fact that certain visitors to the marketing partners' websites see the advertisement (and others do not) may be a result of The Sapphire Holding's categorisation in the past. However, at no time will those involved be favoured or disadvantaged by seeing or not seeing the ad (e.g. no discounts or other benefits relating to the property).
- **Data minimization:** Immowi collects only a limited amount of personal data of the interested visitor (see point II.A., II.B. and V. (i) 1.).
- **Restriction on further processing:** Only part of the personal data of interested visitors will be used at a later date to improve Immowi's services.
- **Limitation of impact:** Immowi does not use the personal data of 'non-interested visitors' (visitors who do not click on the advertisement, or, who click on the advertisement but do not leave any personal data on the Landing Page).

Purpose and limitation in time: Immowi will only use the personal data of interested visitors to optimize the service, as long as they can add value to it.

B. Under the Immokantoor.be

In its activity as **Immokantoor.be** target The Sapphire Holding mainly potential sellers of private homes. On this website these potential sellers can leave the necessary contact details in order to be put into contact with a neighbouring estate agency/real estate agent of their choice.

Potential buyers of private homes can also go there: by providing their contact details and their preferences regarding location, type of home, budget and term guarantee, it is possible to compare different real estate offices / real estate agents in the neighborhood.

I. The Sapphire Holding may collect and process the following personal data in the course of its business:

A. Under the name Immowi.com

- | | |
|--|---|
| ✓ Name | ✓ Communication preference (physical appointment, telephone contact, brochure) |
| ✓ First name | |
| ✓ Email | ✓ IP-address |
| ✓ Phone (fixed and/or mobile) | ✓ Contact details of the contact person of a project partner/business partner |
| ✓ Postalcode | ✓ All personal data contained in the free field of the contact form |
| ✓ Budget | ✓ All other personal data voluntarily transferred to The Sapphire Holding (in the course of correspondence) |
| ✓ Preferred property (with/without garden, number of bedrooms, etc.) | |
| ✓ Preferred time period before making a purchase | |

B. Under the name Immokantoor.be

- | | |
|-------------------------------|---|
| ✓ Type (purchase/sale) | ✓ Asking price/budget |
| ✓ First name | ✓ Property type |
| ✓ Name | ✓ IP address |
| ✓ Email | ✓ All personal data contained in the free field of the contact form |
| ✓ Phone (fixed and/or mobile) | ✓ All other personal data voluntarily transferred to The Sapphire Holding (in the course of correspondence) |
| ✓ Postal codes | |
| ✓ Address | |

II. Methods of collection of personal data

These personal data are collected at or within the framework of:

- ✓ Visiting the Websites
- ✓ Visit of the Landing Pages
- ✓ Het invullen van het contactformulier op de Websites
- ✓ Filling in the contact form on the Websites
- ✓ A partnership with The Sapphire Holding (e.g. request a quote from a project partner, use of a service provider by The Sapphire Holding, etc.).
- ✓ Correspondence with and on behalf of The Sapphire Holding
- ✓ Subscribe to the newsletter
- ✓ Organisation of seminars on lead generation

The provision of certain personal data is a condition of benefiting from the services (e.g. in the case of point I.A. your details may only be forwarded to The Sapphire Holding's project partners on condition that the contact form on the Landing Page is completed). This will indicate which details are mandatory and which are optional.

III. Use of personal data

The Sapphire Holding may use your personal data for the following purposes:

- ✓ The execution of an agreement with the project partners (incl. invoicing and follow-up)
- ✓ Bringing parties into contact (e.g. potential buyers with real estate offices and estate agents, potential sellers with real estate offices and estate agents, etc.)
- ✓ Optimising the quality, management and content of the Websites and the Landing Pages
- ✓ Optimizing its services (cf. point I.A.)
- ✓ Sending direct marketing of interested visitors for another (but similar) project (retargeting purposes)
- ✓ Sending a newsletter
- ✓ Follow-up na een meeting/conferentiegesprek
- ✓ Confirmation of registration for a webinar or seminar
- ✓ Carrying out customer satisfaction surveys, surveys and other market surveys
- ✓ Statistical purposes

IV. Processing shall take place on the following legal grounds, as appropriate:

- ✓ You have consented to the processing of your personal data for one or more specific purposes
- ✓ The processing is necessary for the execution of the agreement with The Sapphire Holding or to take measures at your request prior to the conclusion of an agreement
- ✓ The processing is necessary in order to comply with a legal obligation incumbent on The Sapphire Holding.
- ✓ The processing is necessary to protect your vital interests or those of another natural person.
- ✓ The processing is necessary for the performance of a task in the public interest

- ✓ The processing is necessary to protect the legitimate interests of The Sapphire Holding. Processing on this legal basis will take place in the case of:

- (i) The optimisation of the service towards project partners by dividing the personal data of interested visitors into categories and then using them to train the algorithms of the marketing partners in order to be able to advertise better in the future.

The Sapphire Holding maintains the balance between this legitimate interest and your interests and fundamental freedoms by limiting the impact in the following ways:

1. The categories into which the interested visitors are divided are general, vague and do not contain far-reaching information about the visitor (type of real estate residential, industrial, luxury, etc.);
2. The subdivision has no/little impact on the visitor, as the subdivision is not used to contact the visitor in any other way (but only to advertise better in the future);
3. The Sapphire Holding will not take decisions with a legal (or similar) impact on the basis of the subdivision; and,
4. The Sapphire Holding respects the principles described in Section I.A.; and,
5. The visitor always has the option of opposing this by contacting The Sapphire Holding or filling in the exercise rights form (see below).

- (ii) To engage in retarget direct marketing. Persons who have completed the Landing Page may receive direct marketing on other but similar real estate projects.

The Sapphire Holding maintains the balance between these legitimate interests and your interests and fundamental freedoms by limiting the impact in the following ways:

1. Direct marketing from another project partner will only be sent to interested visitors ('customers' of The Sapphire Holding);
2. Direct marketing will always relate to similar projects; and,
3. The visitor always has the option of opposing this by contacting The Sapphire Holding or filling in the exercise rights form (see below).

V. Disclosure of personal data to third parties

The Sapphire Holding will disclose your personal data to third parties as necessary for the purposes set out in point IV. Your personal data may then be transferred to and/or processed by:

- (i) Project partners (e.g. to provide them with the completed contact forms);
- (ii) Marketing partners (e.g. to improve the algorithm);
- (iii) Software/cloud providers (e.g. to support the use of The Sapphire Holding databases); and,
- (iv) Other service providers (e.g. to develop the Websites and/or the Landing Pages).

If The Sapphire Holding discloses your personal data to third parties in this context, the third party in question is obliged to use your personal data in accordance with the Privacy Laws.

Without prejudice to the foregoing, The Sapphire Holding may disclose your personal data:

- ✓ To the competent authorities (i) where The Sapphire Holding is obliged to do so by law or in the context of judicial or future legal proceedings and (ii) to safeguard and defend the rights of The Sapphire Holding.
- ✓ If The Sapphire Holding or substantially all of its assets are acquired by a third party, in which case your personal data collected by The Sapphire Holding will be one of the transferred assets.

In all other cases, The Sapphire Holding will not sell, rent or transfer your personal data to third parties, unless (i) it has obtained your consent and (ii) it has entered into a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and treatment of your personal data in accordance with privacy.

VI. Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to an addressee residing or domiciled in a country not covered by an adequacy decision issued by the European Commission will be governed by one or more appropriate safeguards (as approved by the EU):

- ✓ The conclusion of a data transfer agreement with the addressee, which will contain the standard contractual clauses as stipulated in the 'Decision of the European Commission of 5 February 2010 (Decision 2010/87/EC)'; and/or
- ✓ Binding operating regulations; and/or
- ✓ Certification mechanism (such as but not limited to the EU-US Privacy Shield).

VII. Storage personal data

Unless a longer retention period is required or justified (i) by law or (ii) by compliance with other regulations, The Sapphire Holding will only retain your personal data for the period necessary to achieve and fulfil the purposes set out in this Privacy Statement under 'IV. Use of Personal Data'.

VIII. Your privacy rights

Within the framework of the processing of your personal data, you have the following privacy rights:

- ✓ Right of access to your personal data;
- ✓ Right of rectification, completion or update of your personal data;
- ✓ Right of deletion of your personal data ('right to be forgotten');
- ✓ Right to restrict the processing of your personal data;
- ✓ Right to transfer your personal data; and,
- ✓ Right of objection/ opposition to the processing of your personal data.

In this context, The Sapphire Holding would like to point out that certain of its services can no longer be provided, in particular if you delete certain necessary personal data or wish to limit the processing of your personal data, or if you object to the processing of your personal data.

If you wish to exercise your privacy rights, please contact privacy@immowi.com or complete and email the form to exercise your privacy rights to The Sapphire Holding.

In principle you can exercise these rights free of charge using the form above.

If you no longer wish to receive newsletters about The Sapphire Holding's services, you can unsubscribe at any time by clicking on the 'unsubscribe' button as provided at the bottom of every e-mail from The Sapphire Holding.

IX. Security of personal data

The Sapphire Holding is committed to taking appropriate and reasonable physical, technological and organisational security measures to prevent (i) unauthorised or unlawful access to your personal data, as well as (ii) loss, misuse or alteration of your personal data.

The Sapphire Holding will keep all personal data it has collected in the cloud.

Notwithstanding (i) The Sapphire Holding's security policy, (ii) the controls it carries out and (iii) the actions it takes in this context, an infallible level of security cannot be guaranteed. No method of transmission or transmission over the Internet or any method of electronic storage is 100% secure and therefore The Sapphire Holding cannot guarantee absolute security in this context.

X. Update Privacy Statement

The Sapphire Holding may update this Privacy Statement by posting a new version on the Websites, whereby The Sapphire Holding will indicate the date of update in the footer of this Privacy Statement. It is strongly recommended that you periodically check the Websites and the relevant page on which the Privacy Statement is displayed to ensure that you are aware of any changes.

XI. References to other websites

The Websites may contain hyperlinks to other websites. When you click on one of these links, you may be directed to another website or Internet resource that may knowingly or through the use of cookies or other technologies collect information about you. The Sapphire Holding has no responsibility, liability or control over these other websites or internet sources, nor their collection, use and dissemination of your personal data. You should check the privacy policies of these other websites and internet sources yourself in order to determine whether they comply with the Privacy Laws.

XII. Contact The Sapphire Holding

If you have any questions about the Privacy Statement or how The Sapphire Holding collects, uses or processes your personal data, please contact us:

- By e-mail: privacy@immowi.com,
- or
- By post: The Sapphire Holding, Hertsbergsestraat 4, 8020 Oostkamp

If you are dissatisfied with the way in which The Sapphire Holding has dealt with these questions or comments or if you have any complaints about the way in which The Sapphire Holding collects, uses or processes your data, you may lodge a complaint with the Data Protection Authority.