

Cookie Policy

This cookie policy (hereinafter referred to as: “**Cookie Policy**”) explains how Harmony collects and processes your personal data using cookies and similar technologies when you use Harmony’s website or the myHarmony platform, accessible via <https://myharmony.eu> (below: “**Platform**”) and the services offered (below: “**Services**”). Cookies are small text files that are saved on the hard drive of a device which contain certain information, sometimes including personal information.

When you use the Platform, we also collect and process other personal information other than through cookies and similar technologies. If you want to know more, please read our Privacy Policy [\[link\]](#). For the sake of clarity, we do not share data collected from cookies and similar technologies on the public Harmony website with financial service providers.

By continuing to use the Platform or by clicking “**Agree**” after you have been notified of the use of cookies and similar technologies, you acknowledge that you have read this Cookie Policy carefully and that you agree to it without reservations. As set out in this Cookie Policy, you can change your cookie preferences at any time.

1. GENERAL

1.1. Your personal information is collected and processed by Harmony NV, with registered office at Cyriel Buyssestraat 13, 9000 Ghent, Belgium, registered with the CBE under number 0666.716.731 (hereinafter: “**Harmony**”, “**we**”, “**us**”) as the responsible party. You can reach us via privacy@myharmony.eu.

1.2. If you share your personal data with other users on the Platform, for example with trusted advisors, these users are responsible for what they do with your personal data.

Any person accessing personal data of other users must comply with the obligations under the applicable legislation regarding the processing of personal data, in particular as regards the obligation to provide information and the granting of rights to parties involved.

1.3. Where reference is made to certain legislation and related implementing measures, such reference shall also be deemed to include all future changes, substitutions or cancellations of such legislation and measures.

1.4. Harmony reserves the right to change, supplement or replace this Cookie Policy from time to time. Such changes, additions or substitutions will be brought to your attention via the Platform. If you do not agree with these changes, additions or substitutions, we ask you to send an e-mail to the e-mail address mentioned in article 1.1. If we do not receive notice from you within three (3) working days after the changes, additions or substitutions have been notified via the Platform, you will be deemed to have accepted all changes, additions or substitutions.

2. COOKIES AND SIMILAR TECHNOLOGIES

2.1. When you visit the Platform, Harmony places cookies or Harmony uses similar technologies. While some cookies or similar technologies are used to make the Platform work properly, others allow your identification. This is explained below, as well as how you can prevent cookies from being placed, or how you can delete already placed cookies by adjusting your cookie settings (see article 2.5).

A. FUNCTIONAL COOKIES

2.2. Some cookies or similar technologies (such as 'local storage' in your browser) are functional and are necessary for the Platform to work properly and provide a good user experience (for example, a cookie that saves preferences, which are only stored during the duration of your session on a certain day).

B. ANALYTICAL AND STATISTICAL COOKIES

2.3. Some cookies collect information that is intended to give Harmony insight (usually via statistics) into how you and other visitors are using the Platform (for example, which functions are popular, which are not, etc.). This information can be used to improve the Platform and improve your user experience. The analytical and statistical cookies, for which you grant permission to use them, are explained below.

2.4. Google Analytics: Harmony uses Google Analytics cookies to determine how you and other visitors use our Platform and how some third-party services are used on our Platform. With these insights, Harmony and external service providers are able to improve our services. The cookies used by Harmony are the "_ga" cookie (2 years' lifespan) and the "_gat" and "_gid" cookies (1 day lifespan).

C. ADJUST YOUR COOKIE SETTINGS

2.5. You can prevent cookies from being placed, or delete already placed cookies, by adjusting your settings in your browser. Help with adjusting these settings can be found on the website of the browser you use. Keep in mind that not allowing cookies when visiting the Platform may lead to some or all of the Platform's functions not working properly.

- **Internet Explorer:** <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Microsoft Edge:** <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>
- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=en>
- **Firefox:** <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- **Safari:** https://support.apple.com/kb/PH21411?locale=nl_BE&viewlocale=en_US

3. RECIPIENTS OF YOUR PERSONAL DATA

- 3.1. Harmony only shares your personal data with the following categories of recipients:
- subcontractors and partners of Harmony with whom we have an agreement and who help us make the Platform and the associated functionalities available, such as IT service providers;
 - other users on the Platform if you wish to share your information with them;
 - third parties with whom we conduct negotiations in the context of mergers, acquisitions or similar operations;
 - partners with whom we conduct certain scientific and/or statistical surveys (in this case only aggregated personal data will be processed).

4. LOCATION AND TRANSFER

- 4.1. Your personal data will only be processed in the European Union.

5. QUALITY GUARANTEES

- 5.1. Harmony will do its utmost to process only the personal data that is necessary to pursue the purposes stated in article 2.
- 5.2. Your personal data will only be processed for as long as necessary to be able to realize the purposes under article 2. As soon as this term has expired, Harmony will de-identify your personal data, unless:
- Harmony or another third party has an interest to keep your personal data in an identifiable form, and this interest outweighs your fundamental rights;
 - a statutory or regulatory obligation or a judicial or administrative order prevents Harmony from doing so.
- 5.3. Harmony will take appropriate technical and organizational measures to protect your personal data from unauthorized access, theft and accidental loss, accidental alteration or destruction. Access to your personal data is limited to Harmony employees, or employees of the service providers we appoint who actually need access to realize the purposes stated in article 2. All staff members who have access to your personal data are bound by a confidentiality obligation. You understand, however, that safety is a best effort commitment and that a full guarantee of safety is impossible.

6. YOUR RIGHTS

- 6.1. You have the right to request access to all personal data processed by Harmony as a result of your use of the Platform and the Services. Harmony reserves the right to charge administration costs for multiple consecutive requests for access that are clearly submitted with a view to causing disruptions or damage to Harmony.
- 6.2. You have the right to request that any incorrect personal data be corrected free of charge. If a request for correction is submitted, this will be accompanied by proof of the faulty nature of the data for which the correction is requested.
- 6.3. You have the right to request that your personal data be deleted if it is no longer necessary considering the purposes set out in article 2. A request for removal will, however, be considered in respect of:
 - a legitimate interest of Harmony or another third party to keep your personal data in an identifiable form and where this interest outweighs your fundamental rights;
 - a statutory or regulatory obligation or a judicial or administrative order preventing Harmony from removing your personal data.

Instead of requesting deletion, you may also request that Harmony limit the processing of your personal data if (a) you dispute the accuracy of such data, (b) the processing is illegal or (c) the data is no longer necessary for the purposes mentioned under article 2, but you need them to defend yourself in legal proceedings.

- 6.4. You have the right to withdraw the permission you have given us, but this withdrawal will not affect the data that we have already collected through cookies or similar technologies based on your prior consent. If you no longer want us to collect data via cookies or similar technologies, you can change your browser settings at any time or delete your cookies (see article 0).
- 6.5. If the intended processing is qualified as direct marketing, you have the right to oppose such processing free of charge and without justification.
- 6.6. You have the right to receive all personal data that you have provided to us in a structured, widely used and machine-readable format.
- 6.7. If you wish to submit a request to exercise one or more of the aforementioned rights, you can contact Harmony directly by sending an e-mail to privacy@myharmony.eu. To the extent certain identity details and contact details are concerned, you can improve and adjust these yourself on the Platform.

The e-mail containing your request to exercise a right will not be interpreted as consent to the processing of your personal data beyond what is required to process your request.

Every request must clearly state which right you wish to exercise, and the reasons for doing so if this is required in accordance with articles 6.1 to 6.6. It must also be dated and signed and accompanied by a digitally scanned copy of your valid identity card or other document that proves your identity.

As soon as this request is received by us, you will receive confirmation of receipt of this request as soon as possible. If the request is valid, action will be taken as soon as reasonably possible and this no later than thirty (30) days after receipt of the request.

If you have a complaint about the processing of your personal data by Harmony, you can always contact Harmony via the e-mail address mentioned in this article 6.7.

If you are dissatisfied with the response from Harmony, you can submit a complaint to the competent data protection authority, i.e. the Belgian Privacy Commission. For more information, please visit <http://www.privacycommission.be>.
