

Privacy Policy

This privacy policy (hereinafter: "**Privacy Policy**") explains how Harmoney collects and processes your personal data when you use the myHarmoney platform, accessible via <https://myharmoney.eu> (hereinafter: "**Platform**") and the services offered (hereinafter: "**Services**").

If you wish to apply with us, we are required to collect and process your personal data. However, for reasons of clarity and readability, this Privacy Policy does not apply to what we do at Harmoney with the data of applicants. We therefore ask that you, if you apply with us, to take note of the privacy policy that applies specifically to applicants and that will be made available via the application page.

When you use the Platform, we use cookies and similar technologies. As a result, personal data about you will also be collected and processed. If you want to know more, please read our Cookie Policy [\[link\]](#).

1. GENERAL

- 1.1. Your personal information is collected and processed by Harmoney NV, with registered office at Cyriel Buyssestraat 13, 9000 Ghent, Belgium, registered with the CBE under number 0666.716.731 (hereinafter: "**Harmoney**", "**we**", "**us**") as the party responsible. You can reach us via privacy@myharmoney.eu.
- 1.2. Your personal data will also be processed by the financial service providers (hereinafter: "**Financial Service Providers**") with which you already have a commercial relationship and with which we have concluded a cooperation agreement. In the cases referred to in Article 3, these Financial Service Providers are jointly responsible with Harmoney for the processing of your personal data.

You should consult the Financial Services Provider's Privacy Policy to take note of the contact details of the Financial Service Providers and their data protection officer.

- 1.3. If you share your personal data with other users on the Platform, for example with trusted advisors, then 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.

- 1.4. 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.
- 1.5. Harmoney reserves the right to change, supplement or replace this Privacy 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. CATEGORIES OF PERSONAL DATA THAT WE PROCESS

2.1. When you register as a user on the Platform and use the Platform and the Services, we obtain personal data from yourself and - if you so choose - from the Financial Service Providers. The personal data that we can collect and process in this way is:

- **Identity data:** name, address, date of birth, language preference, gender and national register number.
- **Contact details:** e-mail address and mobile phone number.
- **Financial data:** data concerning your personal and/or family financial situation such as account number, balance of your account, your financial service provider(s), real estate, savings and investment products and the like.
- **Risk profile:** information about your knowledge and experience with financial products, your risk appetite and so on.
- **Relationship data:** data concerning your connection with other users on the Platform.
- **Communication:** the information that we exchange with you via the Platform, via e-mail and other information channels such as social media.
- **Technical data and usage data:** the operating system of the device you use to connect to the Platform, browser type, IP address of your device, the way in which you use the Platform and the Services, the links you click, etc.
- **Other personal data:** all other personal data that you provide to us.

3. THE PURPOSES FOR WHICH WE PROCESS DATA

- 3.1. Harmony and the Financial Service Providers process your personal data in order to provide you with the Platform and the Services. To this end, we rely on the necessity of this processing to be able to execute the agreements between yourself and us.
- 3.2. Harmony and the Financial Service Providers may process your personal data in order to meet the legal obligations of Harmony and the Financial Service Providers and to be able to comply with any valid request for information and information from government institutions, judicial authorities, police and other competent government bodies. To this end, we rely on the necessity of this processing to comply with our legal obligations.
- 3.3. Harmony and the Financial Service Providers may process your personal data to perform statistical analysis, to conduct research, to improve the Platform, the Services and other

- 3.4. services and to develop new services. To this end this we rely on the necessity of the processing to represent our own legitimate interests as well as those of our affiliated financial service providers. The interests listed here are, on the one hand, the importance of continuing to provide a high-quality service and, on the other, the importance of developing new products and services.
- 3.5. Harmony may process your personal data to inform a third party in the event of a possible acquisition, merger, division or similar operation. To this end this we rely on the necessity of the processing to represent our own legitimate interests. The interests mentioned here are our corporate and commercial interest.
- 3.6. Harmony and the Financial Service Providers may process your personal data to represent the legitimate interests of Harmony, the Financial Service Providers or a third party if your use of the Platform and the Services falls under one of the following cases of abuse: (a) a violation of the applicable laws and terms and conditions of use or the rights of third parties; (b) a threat to the security of the Platform and the Services or the underlying infrastructure, systems and services, such as, but not limited to, viruses, malware, spyware or other forms of malicious software code; (c) expressing hatred, discrimination, racism, slander, defamation, or any other expression that is to be construed as harmful, hurtful or in any way illegal.

4. RECIPIENTS OF YOUR PERSONAL DATA

- 4.1. 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;
 - the Financial Service Providers for which you state that you allow sharing of your information with them;
 - 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).

5. LOCATION AND TRANSFER

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

6. QUALITY GUARANTEES

- 6.1. Harmony will do its utmost to process only the personal data that is necessary to pursue the purposes stated in article 3.
- 6.2. Your personal data will only be processed for as long as necessary to be able to realize the purposes under article 3. As soon as this term has expired, Harmony and the Financial Service Providers will de-identify your personal data, unless:
 - Harmony, the Financial Service Provider 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 or the Financial Service Providers from doing so.
- 6.3. Harmony and the Financial Services Providers 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 and the Financial Service Providers who actually need access to realize the purposes stated in Article 3. 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.

7. YOUR RIGHTS

- 7.1. You have the right to request access to all personal data processed by Harmony and the Financial Service Providers 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 or the Financial Service Providers.
- 7.2. You have the right to request that any incorrect personal data is 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.
- 7.3. You have the right to request that your personal data is deleted if it is no longer necessary considering the purposes set out in Article 3. A request for removal will, however, be considered in respect of:
 - a legitimate interest of Harmony, the Financial Service Provider 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 preventing Harmony or the Financial Service Providers from removing your personal data.

Instead of requesting deletion, you may also request that Harmony and the Financial Service Providers 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 3, but you need them to defend yourself in legal proceedings.

- 7.4. You have the right to oppose the processing of personal data in the cases specified in articles 3.3, 3.4. and 3.5. if you are able to prove that your specific circumstances justify such opposition. However, if the intended processing is qualified as direct marketing, you have the right to oppose such processing free of charge and without justification.
- 7.5. You have the right to receive all personal data that you have provided to us in a structured, widely used and machine-readable format.
- 7.6. If you wish to submit a request to **exercise** one or more of the aforementioned rights, you must first contact your Financial Service Providers. To the extent certain identity details and contact details are concerned, you can improve and adjust these yourself on the Platform. If your Financial Service Providers do not comply with your request, you can contact Harmony directly by sending an e-mail to privacy@myharmony.eu.

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 7.1 to 7.5. 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 the Financial Services Providers or 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 or your Financial Service Providers, you can always contact your Financial Service Providers or Harmony via the e-mail address mentioned in this article 7.6.

If you are dissatisfied with the response from the Financial Service Providers or 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>.
