

Renson Privacyverklaring - Online Consumer Platform

A. General

1. Definitions

- 1.1 'Application' means the Renson application(s) and/or website(s) through which the User submits personal data and to which this privacy statement is applicable.
- 1.2 'Services' means the services provided by Renson that result in the processing of Data to which this Apps, Devices & Platforms privacy statement is applicable.
- 1.3 'Third Party' means any natural or legal person, public authority, service or any other institution that is not the Data Subject, nor Renson, nor any person permitted to process personal data under the direct authority of Renson.
- 1.4 'External Service Providers' means service providers appointed by Renson to provide goods and services. For example, these include payment service providers, haulage companies, debt collection agencies and e-mail or newsletter senders.
- 1.5 'User', 'Data Subject', 'You' or 'Your' means any natural person who submits personal data to Renson.
- 1.6 'Data' means the intangible data that are processed, specifically including but not limited to personal data (of the User or of Third Parties), documents, photographs, files and so on.
- 1.7 'Parties' means Renson and the User.
- 1.8 'Platform' means any Renson device and/or Application that processes Your Data.
- 1.9 'General Data Protection Regulation' means "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 personal data [...] and its implementing acts and decrees.
- 1.10 'Device' means any Renson device that processes Your Data.
- 1.11 'Data Controller' means the natural or legal person responsible for the processing of personal data in accordance with Article 4 (7) of the General Data Protection Regulation.
- 1.12 'Data Processor' means any natural or legal person, public authority, service or other institution that processes personal data on behalf of the data controller in accordance with Article 4 (8) of the General Data Protection Regulation.

2. Scope

2.1 This privacy statement is applicable to all processing of personal data by the following Applications, in the following files or pursuant to the following activities or company processes of Renson.

File / company process	Application ¹
Installation of Renson connected devices	●
Use of Renson connected devices	●
Online account management	●

☞ Table 1. Processing concerned

Personal Data processed	Processed by			Mandatory (Article 8.1)		Necessary (Article 8.2)		Special categories (Article 7.1)	Consequences of non-provision (Article 8.3)				Purposes (Article 11.1)
	Online platform	Application	Devices (without app)	Mandatory ¹	Contractual	Necessary	Optional		N/A	DSS	NIP	LJM	
Account data (login & password)	●	●	-	●	-	●	-	-	●	-	-	-	SERV, TR, RC
Address	●	●	-	-	-	●	-	-	●	-	-	-	COM, DM, WAR, DPC, SUP
Analytical data based on sensor data	●	-	●	-	●	-	●	-	●	●	-	-	UP, ANA, SUP, MON, OPT
Device ID	●	-	●	-	●	●	-	-	●	-	-	-	TR, SERV
E-mail	●	●	-	-	●	●	-	-	●	-	-	-	SERV, DM, COM, DMPAR
User data of Renson Devices	●	-	●	-	●	-	●	-	-	●	-	-	ANA, TR, SUP, MON, OPT, UP
Family composition (including pets)	●	-	-	-	●	-	●	-	-	●	-	-	UP, OPT, ANA
Signature (scanned)	●	-	-	-	●	●	-	-	●	-	-	-	WAR
Internal unique identifier	●	●	-	-	●	●	-	-	●	-	-	-	[All]
IP address	●	●	-	-	●	●	-	-	●	-	-	-	COM, TR, RC
Age	●	-	-	●	-	●	-	-	-	●	-	-	UP, OPT, ANA
Renson Device location data	●	-	●	-	●	-	●	-	-	●	-	-	SUP, UP, TR
Name & surname	●	●	-	●	-	●	-	-	●	-	-	-	COM, SERV, DM, WAR, DMPAR, SUP, DPC
Sensor data (per home or per room: incl. CO2, VOC, humidity, temperature, energy consumption, ventilation, flow per room)	●	-	●	-	●	-	●	-	-	●	●	-	UP, ANA, TR, SUP, MON, OPT, SR
Telephone number	●	●	-	-	●	-	●	-	-	●	-	-	COM, SUP, DM
Home type	●	●	-	-	●	-	●	-	-	●	-	-	UP, OPT, ANA
Wi-Fi & network data	-	-	●	-	●	-	●	-	-	●	-	●	SUP, RC, TR

☞ Table 2. Overview of Personal Data processed by Renson as the Data Controller¹

7. Special categories of personal data

7.1 If Renson proceeds to process special categories of personal data in accordance with Article 9 of the General Data Processing Regulation, this will be stated as per Table 2. Overview of Personal Data processed by Renson as the Data Controller¹

¹ ● Yes
○ Possibly, if circumstances arise
- No

2.2 This Apps, Devices & Platforms privacy statement is provided in accordance with Article 13 et seq. of the General Data Protection Regulation.

2.3 This privacy statement may be changed without prior notice for any future processing. However, if such changes were to have an impact on the existing processing of your personal data, you will be notified in advance. It is advisable to read this privacy statement before every submission of personal data.

3. Age of the Data Subject

3.1 By accepting this privacy statement, You expressly confirm that you are aged 16 or over.

3.2 If Article 3.1 does not apply, You must be granted consent or authorised by the person who has parental responsibility over You.

B. Renson's identity and contact details

4. Renson's identity

4.1 For the purposes of data processing, the data controller in accordance with the General Data Protection Regulation is:

- Renson Ventilation NV
- Registered office: Industriezone 2 Vijverdam, Maalbeekstraat 10, B-8790 Waregem, Belgium
- Registered in the Crossroads Bank for Enterprises under number 0462.152.837

5. Contact with Renson

5.1 You may contact Renson via its Customer Service team:

- Address: Industriezone 2 Vijverdam, Maalbeekstraat 10, B-8790 Waregem, Belgium;
- Tel: +32 56 62 71 11;
- E-mail: info@renson.be;
- Web: www.renson.eu.
- For more privacy-related information and the latest version of the privacy statement, please see: www.renson.eu/privacy

C. Processing of Data as the data controller

6. Data processed

6.1 When using the Renson Platform, Renson will process the following data:

8. Data processing rules

8.1 The processing of the Data listed in Table 2. Overview of Personal Data processed by Renson as the Data Controller is a

- legal requirement: data marked in the 'Mandatory' column;
- contractual agreement: data marked in the 'Contractual' column.

8.2 The processing of the Data listed in Table 2. Overview of Personal Data processed by Renson as the Data Controller is:

- required to conclude or execute the agreement: data marked in the 'Necessary' column;
- optional to conclude or execute the agreement: data marked in the 'Optional' column.

8.3 The consequences of not providing personal data marked as optional are:

- limited functionality: 'LIM'
- reduced aftersales service: 'DSS'
- no individual promotional offers: 'NIP'

Processing grounds	General Data Protection Regulation.	Identification
1. Consent (general as well as for special categories of personal data)	6(1)	C
2. Pre-contractual actions and execution of a contract or agreement	6(2)	A
3. Legal requirements	6(3)	LO
4. Essential interests of the Data Subject	6(4)	VI
5. General interest or public authority	6(5)	PI
6. Legitimate interests pursued by the data controller or a Third Party	6(6)	LIC
Opt-in for direct marketing	-	DM

Table 3. Overview of processing grounds

10.2 The grounds for all processing of Data by Renson are set down in Table 4. Overview of processing purposes (Article 11.1 below).

11. Processing purposes

11.1 Renson may process Your Data for the following purposes:

Processing purposes	Processed by			Identifier	Processing grounds ²	Retention period
	Online platform	Application	Devices (without app)			
Account management	-	•	-	ACC	A	Lifetime of the user account
Analysis – Collection and storage of sensor data, analysis and reporting of ventilation use, as well as provision of insights and advice surrounding the home's HVAC (healthy spaces)	•	-	•	ANA	C	370 days
App – Remote control of the Device	•	-	•	RC	C	Lifetime of the user account
Communication with the User	•	•	•	COM	LO, C	Lifetime of the user account, with a minimum of ten years after initial processing
Compliance with General Data Protection Regulation	•	•	•	DPC	LO, LIC	Indefinite
Direct marketing re: Renson products	•	•	•	DM	C (DM)	Until User opts out
Monitoring – Monitoring the functionality of devices	•	-	•	MON	LIC	2 days
Optimisation – Improvement and optimisation of Platform elements	•	•	•	OPT	LIC	2 days
Partner mailings	•	•	•	DMPAR	C (DM)	Until User opts out
Profiles – The creation of user profiles to automate and optimise the functionality of the Devices, as well as the creation of a central customer profile	•	-	•	UP	C	Lifetime of the user account
Scientific research	•	-	•	SR	LIC	-
Services – Services related to the Renson Platform	•	•	•	SERV	C, A	Lifetime of the user account
Support – The provision of online or remote support by Renson or one of its independent installers	•	-	•	SUP	C, A	Lifetime of the user account
Technical purposes	•	•	•	TR	C, A, LIC	Lifetime of the user account (or two days if no Application is used)
Warranty	•	-	•	WAR	LO	Ten years after initial processing

Table 4. Overview of processing purposes¹

11.2 The legitimacy of the processing of personal data by Renson may or may not be partially based on the legitimate interests pursued by Renson or a Third Party ('LIC', see table Table 3. Overview of processing grounds). These legitimate interests of Renson or a Third Party are as follows:

- Compliance with General Data Protection Regulation (DPC)
 - The right of Renson to process the data of the data subject with a view to the correct application of the General Data Protection Regulation;
- Monitoring (MON)
 - The right of Renson to monitor the functionality of its products in order to react to poor or suboptimal performance, recall devices, trace system faults and so on.
- Optimisation (OPT)
 - The right of Renson to temporarily process data originating from its Platform with a view to product optimisation and improvement;

9. Data source

9.1 The Data listed in Article 6 are collected:

- Directly from the User, via the Renson Platform;
- Via Your Renson Device installer;

10. Data processing legitimacy

10.1 As the data controller, Renson may only process your personal data on the grounds of:

- Technical purposes (TR)
 - The right of Renson to process device data for purely technical purposes.
- Scientific research (SR)
 - The right of Renson, as a ventilation specialist, to cooperate on scientific research in relation to home ventilation;

12. Existence of automated decision-making or profiling

12.1 The Platform does not process any data for automated decision-making purposes.

13. Recipients and categories of recipients of the personal data

13.1 Depending on the purpose and imperative of the processing, personal data may be disclosed to the following recipients:

Recipient (Category)	Application			Requirement / Purpose	Recipient identity ³
	Online platform	Application	Devices (without app)		
External service providers					
Software developers	•	•	•	software development; exclusively for testing purposes by a highly restricted number of persons	LoQutus, PegusApps, Indrivo
Hosting providers	•	•	•	Hosting the Renson Applications and Platforms and their associated data	Sentia, Microsoft
Solution integration partners	•	•	•	Communication between device and application	OpenMotics, Overkiz
Other Third Parties					
Affiliated companies within the Renson group	•	•	•	Central management of customer data	Renson Sunprotection-Screens NV, registered office: Kalkhoevestraat 45, 8790 Waregem, Belgium, company number BE-0432.549.526 Renson Sunprotection-Projects NV, registered office: Maalbeekstraat 6, 8790 Waregem, Belgium, company number BE-0448.673.203

² See 'Identification' column in Table 3. Overview of processing grounds.

³ If known whether this is a permanent supplier or subcontractor.

Home owners (including social housing associations)	<input type="radio"/>	-	<input type="radio"/>	Insofar as a home is not occupied by its owners, the owner of the home will have <u>limited</u> insight into the home's ventilation data.	-
Installers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	For diagnostic, maintenance and repair purposes, subject to consent from the Data Subject	-
Third Parties via the API for Renson connected Devices	<input type="radio"/>	-	<input type="radio"/>	Only if the data subject has given express consent	-
Universities, educational establishments and/or research institutions	<input type="radio"/>	-	<input type="radio"/>	In relation to scientific research re: ventilation data/sensor data	-

Table 5. Recipient categories¹

13.2 The aforementioned recipients will always manage the personal data they receive in accordance with this privacy statement.

14. Data retention period

14.1 When storing your personal data, Renson applies different retention periods. The exact retention period for each processing purpose is indicated in *Table 4. Overview of processing purposes*.

D. Your rights as a data subject

15. Access

15.1 The User is entitled to information of the processing of the User's Data performed by Renson. Insofar as the User is unable to find the necessary information in this privacy statement, he/she may contact using the details provided in Article 5 at any time.

16. Correction

16.1 The data subject is entitled to instruct Renson to immediately correct any incorrect personal data held in relation to him/her. With due regard to the processing purposes, the data subject is entitled to complete any incomplete personal data, by submitting an additional declaration amongst other things.

17. Data transferability

17.1 In certain circumstances specified by the General Data Protection Regulation, You are entitled to obtain the personal data you have provided to Renson in a structured, conventional and machine-readable format and transfer such data to another Data Controller without being obstructed by Renson, if processing is based on:

- your consent, or
- the execution of an agreement to which You are a party or Your prior request to conclude an agreement, and
- processing is performed by automated means.

17.2 In the exercise of your right to data transferability in application of Article 17.2, you will, if technically possible, be entitled to have your Personal Data transferred directly from Renson to the other Data Controller.

18. Withdrawal of consent

18.1 You have the right to withdraw your consent at any time, specifically but not exclusively in relation to the special categories of personal data in accordance with Article 7.1.

18.2 Any withdrawal of consent will not affect the legitimacy of data processing on the grounds of consent prior to the withdrawal, nor the legitimacy of processing on any other legal grounds, such as the execution of an agreement to which you are a party.

19. Restriction

19.1 You are entitled to obtain a restriction on processing from Renson if one of the following elements is applicable:

- you contest the accuracy of the personal data during a period that enables Renson to check the accuracy of the personal data;
- the processing is unlawful and you object to the erasure of your personal data and request a restriction on their use instead;
- Renson no longer requires the personal data for its processing purposes, but you require these data for the initiation, exercise or defence of a legal claim
- You object to the processing in accordance with Article 20.1 et seq. in anticipation of a response to the question whether the legitimate grounds of Renson outweigh those of the Data Subject.

19.2 When processing is restricted in accordance with Article 19.1, personal data, except for their storage, will only be processed with Your consent, for the initiation, exercise or defence of a legal claim, to safeguard the rights of a Third Party or for serious reasons in the general interest of the European Union or a member state.

19.3 If you have obtained a restriction on processing in accordance with this Article, You will be notified by Renson before such restriction on processing is lifted.

20. Objections

20.1 Under the circumstances discussed in Article 21 (1) of the General Data Protection Regulation and for reasons relating to Your specific situation, you are at all times entitled to object to the processing of Your personal data, including profiling, based on the legitimate interests for processing by Renson or a Third Party.

20.2 Renson will stop processing the personal data unless it is able to invoke compelling and legitimate grounds for such processing that override the interests, rights and freedoms of the Data Subject, or that relate to the initiation, exercise or defence of a legal claim.

20.3 When personal data are processed for direct marketing purposes, you are at all times entitled to object to the processing of Your personal data for such marketing, including the profiling in relation to such marketing.

21. Data erasure ('right to be forgotten')

21.1 You are entitled to demand that Renson erases the personal data in relation to you without any unreasonable delay, and Renson is obliged to erase personal data without any unreasonable delay when one of the following circumstances applies:

- Your personal data are no longer required for the purposes for which they were collected or otherwise processed;
- You withdraw the consent that forms the grounds for processing in accordance with Article 11, and there are no other legitimate grounds for processing;
- You object to the processing in accordance with Article 20;
- Your personal data are unlawfully processed;
- Your personal data must be erased to meet a statutory obligation on Renson's part arising from European Union law or member state law;
- Your personal data are collected in relation to an offer of services to a child.

22. Exercise of rights by the Data Subject

22.1 To exercise any of the rights described in this statement, the user may contact Renson by means of:

- a signed request submitted by post;
- an e-mail;
- a request via our website.

22.2 Renson's contact details may be viewed in Article 5.1.

22.3 The necessary information will be communicated to the User without delay, and in any circumstances, no later than within one month or receipt of the request. This term may be extended by an additional two months if necessary, depending on the complexity and the number of requests received. Renson will inform the Data Subject of any such delay within one month following receipt of the request, stating the reasons for the delay.

22.4 All communication or all measures taken under Articles 15 to 22 will be free of charge. In application of Article 15, Renson will provide a copy of the personal data processed free of charge. For any other copies requested by the Data Subject, Renson may charge a reasonable fee in relation to administrative costs.

22.5 If You have submitted a request electronically, and unless otherwise requested by the Data Subject, the information will be provided by in an equivalent electronic form to the one used.

22.6 If any requests are manifestly unfounded or excessive, particularly due to their repetitive nature, Renson may:

- charge a reasonable fee in relation to the administrative costs incurred to provide the necessary communication or information or to perform the requested actions;
- or, refuse to respond to such requests.

22.7 When Renson has reasonable doubts surrounding the identity of the natural person submitting requests as described in Articles 15 to 22, Renson may request the provision of additional information required to confirm the identity of the Data Subject.

E. Transfer of personal data

23. Processing location

23.1 Your personal data will be processed in the country where Renson's registered office is located (see Article 4), or at any other location within the European Union.

24. Transfer to third countries or international organisations

24.1 Your personal data will not be transferred outside of the European Union.

25. Appropriate or suitable safeguards for data transfer

25.1 In light of Articles 23.1 and 24.1 of this privacy statement, there is no need for appropriate or suitable safeguards for data transfer to third countries or international organisations.

F. Complaints

26. Complaints handled by Renson

26.1 If You wish to submit a complaint, You may do so using the communication channels specified in Article 5.1.

26.2 Renson will provide the User with the required information regarding any actions take following its request without any unnecessary delay, and in any case within one month following receipt of the request. This term may be extended by an additional two months if necessary, depending on the complexity and the number of requests received. Renson will notify You of any such delay within one month of receipt of the request, stating the reasons for the delay.

26.3 If Renson does not comply with your request, it will inform you of the reasons for not taking any action without delay and by no later than within one month following receipt of the request.

27. Complaints handled by the supervisory authority

27.1 If You are of the opinion that the processing or Your personal data is in breach of the General Data Protection Regulation, and notwithstanding any other options for administrative or extrajudicial objection, the User is entitled to seek remedy from Renson before the supervisory authority, more specifically in the member state of Your habitual place of residence, place of work or the place of the alleged breach

27.2 The supervisory authority for your habitual place of residence may be found via this link: <https://edps.europa.eu/>