

Date 5th November 2021

Reference Graydon Company number

Re. Your company details at Graydon Belgium NV.

Dear Sir or Madam,

You have recently registered a company. Congratulations on your new enterprise!
We are sending you this letter to inform you that the details of your registration in the Kruispuntbank van Ondernemingen (KBO, Belgium’s Central Business Data Bank) are publicly accessible and will also be included in the database of Graydon Belgium NV. Below, you can read what your information may be used for, and why.

**Why is your company included in our database?**

Graydon offers reliable insights about all companies in Belgium. We believe that transparency increases trust between business partners and that efficient business flows are promoted when organisations have a clear idea about the opportunities they have and the risks to which they are exposed. Based on information from various sources, we therefore generate valuable business insights, which enable our clients to take even better business decisions. Publicly available information from the KBO is one of the sources that we use for this purpose.

Where sole traders are concerned, the processing of business information may also include business data that is also considered to be personal data within the meaning of the General Data Protection Regulation (GDPR). The same applies when a legal entity can be (directly or indirectly) traced back to a natural person, for example due to the name given to the legal entity. For the purpose of interpreting the GDPR, Graydon Belgium NV is the data controller, and as such, serves as your point of contact for any questions you may have about the processing of your personal data.

**What information does Graydon process about you and your company?**

The following categories of business-related personal data concerning your company may be processed by Graydon:

* Contact details for your company (name, address, telephone number, website, VAT number, company registration number, legal form);
* Name, date of birth and function title(s) of directors, shareholders, and authorised representatives;
* Data concerning the ultimate beneficial owner (UBO) of your company;
* Payment behaviour of your company based on the payment experiences other organisations have had with your company.

You can use this letter to inform relevant persons (directors) accordingly.

**In what way can information about your company be requested?**

Via *Credit Management* solutions (company information and insights such as scores), our clients can look up additional information about parties they (may potentially) do business with, as well as creditworthiness of such relations. It is possible that a company information report is requested about your company. Based on this report, our clients may decide under what conditions they may or may not wish to engage in a business relationship with your company.

It is expected of professional businesses that they screen (potential) clients and their directors. Through *Risk & Compliance* solutions, our clients are given the opportunity to uniformly inspect (potential) business relations, such as clients or ultimate beneficial owners (UBOs), and to comply with applicable laws and regulations quickly and effectively, such as the Act for the prevention of money laundering and financing of terrorism, duty of care, etc. Based on this screening, our clients may decide under what conditions they may or may not wish to engage in a business relationship with your company.

Through *Marketing Information*, our clients obtain insights they can use to, among other things, set up targeted marketing campaigns. This makes it possible to outline a relevant target audience based on various characteristics, allowing prospects to be approached more efficiently and effectively. Based on this, our clients may decide to approach your company for marketing purposes, in which event they are, of course, bound by all applicable laws and regulations, including the Bel-me-niet Register (No solicitation register). You can always object to this processing, after which we will stop processing your personal data for these purposes.

**What does this mean for you?**

It is important for every company to know who it does business with, so that business can be conducted in a financially safe manner. Based on insights into your company, your company may more quickly and readily be accepted for (business) credit and (government) subsidies or other forms of finance. If the information about your company is incomplete or if information about your company points to a possible risk, that could cause your company to find it more difficult to conduct business and being subjected to stricter terms and conditions. Company information can also provide protection for your company. It offers clear insight into the financial position of your company, so that optimal advice can be provided.

**How does Graydon obtain information about your company?**

Graydon obtains its information from several *public* sources, including the KBO, public databases (such as the Insolvency or Administrators and Curatorship Register) and (court) judgments as published in the Belgisch Staatsblad (Belgian National Gazette) and Regsol, information concerning employer classes of the RSZ (Belgian DWP) and annual accounts as filed with the National Bank of Belgium. Graydon also obtains information from *non-public* sources: from you yourself, for example where data provided by the relevant company is concerned (e.g., your annual figures) or from Graydon clients and others who have a business or financial relationship with Graydon (payment experiences) or from other (commercial) parties Graydon does business with.

**Who does Graydon share your data with?**

Graydon supplies the business information it collects, including (business-related) personal data, to its clients. Those clients are companies and governments in Belgium. In addition, Graydon shares information with its affiliated entities in the Netherlands and the United Kingdom, and other parties Graydon collaborates with, such as foreign business information bureaus. As such, it may happen that a foreign business information bureau, for their foreign client, requests business information from Graydon about a company registered in Belgium.

**Why is Graydon allowed to process your data?**

Graydon is allowed to process your (business-related) personal data in accordance with the GDPR on the basis of a legitimate interest. In doing so, we always carefully weigh our interests and those of our clients (such as the importance of legal certainty when engaging in or maintaining business relations) against your rights and liberties as an entrepreneur. Of course, it is always possible that, in your specific situation, there are circumstances of which we are unaware, and which may affect the weight of your interests in that process. If you would like Graydon to more closely inspect your specific situation, please feel free to contact us. We will be happy to review the weighing of interests together with you, to see if it should result in a different outcome.

Of course, reliability, diligence, and security are our top priorities when processing your business data. That is why we have implemented suitable organisational and technical measures to secure your data. In addition, we will not retain your data any longer than required for the performance of our purposes, unless we are required to retain your personal data to comply with legal requirements or in the event of a dispute.

**For more information, please refer to our Privacy Statement**

In our Privacy Statement, on our website (**www.graydon.be/en/gdpr**), you will find more comprehensive information about the processing of your personal data. There, you can also read how you can exercise your rights under the GDPR, such as the right to access and rectify your personal data, your right to object against processing, and your right to have your personal data removed from our database.

Should you have any questions, after reading this letter and our Privacy Statement, please don’t hesitate to contact us by email at: gdpr@graydon.be. We wish you a lot of commercial success with your company!

Yours faithfully,

Graydon