



BRS Privacy Statement

This version is applicable as from 01/09/2021.

Table of contents

To start with: changes to this privacy statement	2
1. Who is responsible for processing your personal data?	3
2. Purposes of the processing: why does BRS process your personal data and on what basis?	3
2.1. BRS processes your data in order to be able to comply with legal obligations	3
2.2. BRS processes your data in the context of its member administration and its operations.....	4
2.3. BRS processes your data in the context of marketing activities	5
2.4. BRS processes data for fraud prevention and in order to guarantee security.....	6
2.5. BRS processes data for the management of relationships with suppliers and partners	6
3. What personal data does BRS use?	6
3.1. Members of BRS vzw and members of BRS Microfinance Coop cv	6
3.2. Directors	6
3.3. Other contacts (suppliers and partners)	7
3.4. Temporary storage of images from surveillance cameras	7
3.5. Non-targeted visual impressions.....	7
4. How long does BRS retain your data?	7
4.1. Retention period	7
4.2. What does BRS do with your personal data after the retention period has expired?.....	8
5. Does BRS share your personal data with third parties?	8
5.1. What BRS does not do	8
5.2. What BRS does do	8
6. Personal data outside the European Economic Area?	8
7. Links to other websites and social media ?.....	9
7.1. BRS' social media pages	9
7.2. Social media share buttons	9
8. What are your rights?.....	9
8.1. Access to your data	9
8.2. Rectification of your data	10
8.3. Right of objection	10
8.4. Right to withdraw your consent.....	10
8.5. Right to erasure of data.....	10
8.6. Right to restrict data processing operations	10
8.7. Right to data portability	11
8.8. Right to lodge a complaint with a data protection authority.....	11
9. How can you contact BRS?	11

BRS Privacy Statement

BRS stands for two organisations under one roof: BRS vzw and BRS Microfinance Coop cv.

BRS vzw works together with partners in the South to improve the quality of life of the poorer population in a sustainable manner. BRS vzw provides support not only with money but above all with advice and training for employees of the local microfinancing institutions (MFIs).

BRS Microfinance Coop cv is a Development Fund that offers its members the opportunity to invest jointly in MFIs in the South. BRS Microfinance Coop cv is a joint initiative of BRS vzw, Cera cv and KBC Bank nv. The objective of this company is to invest in MFIs in the South that offer financial services in a professional manner to the poorer population.

Due to the nature of the service provided to the members of BRS vzw / to the members of BRS Microfinance Coop cv, BRS vzw / BRS Microfinance Coop cv (hereinafter: “BRS” or “we”) has certain personal data at its disposal.

BRS considers it important that the provision of its services is personal, straightforward and reliable. BRS is thus continually looking for ways to improve them and to tailor them as much as possible to the personal needs of its members, its prospective future members and to other data subjects.

In this privacy statement, BRS sets out for you how we handle your personal data. In it, you can read about which of your personal data BRS processes and what influence you can exert on this yourself. In the context of this privacy statement, we are referring to the personal data of our members, our prospective future members and other data subjects. This privacy statement is made up of several chapters.

To start with: changes to this privacy statement

BRS can change this privacy statement periodically, for example on the occasion of new services, new functions on the websites or to comply with new legal, contractual or administrative obligations. We therefore recommend that you consult this privacy statement regularly.

The most recent version can be found on the BRS website. BRS will inform you via its website or other communication channels before any important change in the content.

What has changed compared to the previous version of the privacy statement?

- A clarification that our privacy notice applies to our members, prospective future members and other data subjects,
- A refinement of the purposes of the processing ([part 2](#)), namely:
 - BRS processes your data in order to be able to comply with legal obligations ([2.1.](#))
 - BRS uses personal data in the context of its member administration and its operations ([2.2.](#)), such as sending invitations by e-mail and managing attendance in the context of its general meetings ([2.2.b](#)),
 - BRS processes personal data in the context of marketing activities ([2.3.](#)),
 - BRS processes personal data for the management of relations with suppliers and partners ([2.5.](#)),
- Temporary storage of images from surveillance cameras at the registered office ([3.4.](#)),

- BRS' social media pages and social media on the BRS website ([part 7](#)),
- A number of more precise statements about your rights ([part 8](#) and [9](#)).

1. Who is responsible for processing your personal data?

These organisations act as the data controller for the processing of your data, depending on the activity and/or service provision that they make available to you:

- **BRS vzw**, Muntstraat 1, 3000 Leuven
RLP Leuven, registered with the Crossroads Bank for Enterprises 0446.437.154;
- **BRS Microfinance Coop cv**, Muntstraat 1, 3000 Leuven
RLP Leuven, registered with the Crossroads Bank for Enterprises 0508.996.711.

Here, “BRS” stands for these two organisations.

If you have a question about how BRS handles your personal data, or if you wish to exercise your rights, you can contact us. You can find the contact information and information about your rights under [points 8 and 9](#) of this privacy statement.

2. Purposes of the processing: why does BRS process your personal data and on what basis?

A general overview, in which we show the main purposes of the data processing, can be found below. The purpose of the overview is to give you an overall picture at a glance of the reasons why BRS processes your personal data.

2.1. BRS processes your data in order to be able to comply with legal obligations

This processing take place on the grounds of the legal obligations to which BRS is subject.

a) BRS Microfinance Coop cv

The personal data of (possibly prospective) members of BRS Microfinance Coop cv are processed in order to handle their request to become a BRS Microfinance Coop member. Under Article 6:25 of the Companies and Associations Code, these data must be recorded and managed in the share register, which is kept at the company's registered office and to which every member can obtain access.

For the subscribing to and management of the BRS Microfinance Coop shares, we call upon the services of KBC Bank/KBC Brussels/CBC Banque (hereinafter referred to as “KBC”/“CBC”) to exercise the counter function. You can read more about how your personal data are processed at KBC/CBC under point 2.2.(a).

Under the applicable legislation or regulations, BRS Microfinance Coop cv may in some cases also be obliged to disclose your personal data to the Financial Services and Markets Authority (FSMA), as well as in general to any competent judicial or administrative authority.

b) BRS vzw

If you are a volunteer with BRS vzw, BRS processes your personal data in order to meet its legal obligations as a volunteer organisation, such as among other things for the obligation to provide information to volunteers, for the fulfilment of the insurance obligation, for the granting of reimbursement of expenses, etc.

BRS processes your data for the management of gifts and donations on the basis of the execution of the agreement with you and on the basis of the law (for the tax certificate).

c) BRS general

BRS vzw and BRS Microfinance Coop cv cannot be held liable when they are required to transfer personal data (i) pursuant to any statutory provision, (ii) on the grounds of an explicit order by a competent supervisory or administrative authority, (iii) in the context of a police, official or judicial investigation, or (iv) on the basis of a judicial decision.

2.2. BRS processes your data in the context of its member administration and its operations

BRS processes your personal data for its general operation and for all the obligations and services associated with the member relationship.

These concern (a) the member administration, (b) the general meetings, (c) the administration of the member relationship and the interactions between BRS and its members, (d) the improvement of the service provision.

In the cases described below, the data processing takes place on the grounds of (i) a legal obligation (e.g. organising the general meeting and keeping track of the member administration) (ii) our legitimate interests in order to be able to deliver the member relationship or to improve our service provision and (iii) the contractual obligations that BRS Microfinance Coop cv has towards the members (e.g. managing and keeping track of the share participations).

a) Member administration

We use your personal data in the context of the member administration of BRS.

The management of the cooperative shares and the payment of any dividend from BRS Microfinance Coop cv is carried out in a member account that is linked to your bank account. KBC/CBC acts as the counter for BRS Microfinance Coop cv for the subscription and management of the member shares.

The following personal data are used: identification details, contact details and details of your family situation, national registration number and the financial data relating to the member shares (e.g. account number, shareholding, details of transactions). The (possibly prospective) member can find information about how KBC/CBC handles these data in the privacy statement of KBC or CBC (www.kbc.be/privacy and www.cbc.be/privacy).

If a member informs KBC/CBC of any changes to his or her identification data, contact details or family situation then BRS Microfinance Coop cv is informed of them.

b) General meetings

BRS processes your personal data for the preparation and management of attendance and voting procedures for the general meetings and for sending out notifications (e.g. invitations to general meetings).

Such data shall also be used to manage, update and to make analyses of the members' database with regard to the general meetings.

c) Management of member relationship

If you are a member of BRS vzw and/or a member of BRS Microfinance Coop cv, we can process your personal data with a view to managing and performing all services associated with this relationship.

The purpose of the processing, among other things, is to inform the members of BRS activities in which they can participate unless the member has objected to this.

d) Improving our service provision

The purpose of this processing is to improve the service provided to our members and prospective future members.

In order to keep our operations and communication as relevant as possible, we can use your personal data for internal strategic and informative purposes, such as: maintaining data and histories of participations in BRS activities, data from cookies (such as preferences and click behaviour on the BRS website), and conducting member satisfaction surveys (Net Promoter Score survey). BRS uses your personal data for these purposes unless you have objected to such use.

The information we obtain from these analyses is used for statistical analyses, to evaluate, improve and adapt the processes and applications on the basis of new developments, such as the optimisation of campaigns, projects and training, and of the offer on the website.

2.3. BRS processes your data in the context of marketing activities

BRS processes the data for direct marketing purposes, either on the basis of your consent or on the basis of its legitimate interest in keeping data subjects informed about its activities and services.

BRS can use your personal data to inform you - also via e-mail - about the current share issues of BRS Microfinance Coop cv and Cera cv. Given the inextricable interrelation between Cera and the BRS Microfinance Coop Development Fund, the personal data of the members are mutually exchanged. Since the data are grouped per person across both companies, you may also receive information about Cera (activities, current share issues, etc.).

BRS can call on marketing and communication agencies and similar companies that use personal profile information available to such agencies to inform you via their channels about the current share issues of Cera and/or BRS Microfinance Coop, and about BRS activities (e.g. Google, Facebook, Instagram, Twitter, etc.).

If you fill in a BRS form on the website or during an event (e.g. a webinar or a tombola), we process your data for the administrative management of the process for which you completed the form. BRS

takes into account your consent for the use of your personal data from the form in order to contact you later with newsletters, or information about BRS operations.

2.4. BRS processes data for fraud prevention and in order to guarantee security

In this context, BRS processes your personal data on the basis of legitimate interest:

- for monitoring purposes, such as the detection and/or appropriate treatment and/or prevention of irregularities and fraudulent actions, even if these acts may have been carried out by its employees or intermediaries;
- in order to guarantee the safety, security and monitoring of persons and goods.

2.5. BRS processes data for the management of relationships with suppliers and partners

BRS processes your data when you are the contact person for a supplier or partner. In that case, it is possible that we have obtained your data indirectly from the supplier or partner.

Data processing takes place based on our legitimate interest in order to comply with our contracts with suppliers and partners.

3. What personal data does BRS use?

3.1. Members of BRS vzw and members of BRS Microfinance Coop cv

In order to IDENTIFY you	
Name, gender, date of birth, nationality, address, identity card number, member number, national registration number, e-mail address	
In order to CONTACT you (safely)	
Telephone number, e-mail address, language, etc., as well as more technical data such as identification data of the devices that you use (MAC address, IPs, unique identification data of your device, etc.)	
In order to be able to SERVE you properly	
Your member shares	Member number, number of BRS Microfinance Coop shares, date of entry, date of exit, income statement
Your activities	Participation in BRS activities
Your preferences and interests	Visits to the website, BRS involvements
Your family situation	Civil status, family composition

BRS can collect the following information from prospective future members: identification and contact details such as name, date of birth, address, e-mail address, telephone number, and your potential preferences and interests in BRS’ operations and activities.

The same data of former members can be used in order to contact them within a reasonable period of time after their membership or departure, except in case of objection.

3.2. Directors

With the exception of the personal data mentioned under 3.1., the following personal data of the directors of BRS can also be processed: curriculum vitae, photograph, dates of start and end of membership, mandates and term of office, attendance at meetings and remunerations paid.

3.3. Other contacts (suppliers and partners)

BRS processes personal data of the contact persons of its suppliers and of the organisations with which it concludes agreements in the context of supporting regional, national and international social projects.

The personal data that are processed essentially concern the name, date of birth, professional address, telephone number and e-mail address of the contact person.

3.4. Temporary storage of images from surveillance cameras

The registered office of BRS is located in the Cera building in Leuven. Surveillance cameras are installed in the building to monitor the perimeter and semi-public areas. BRS respects the specific rules applicable to this. There is a clearly visible sticker at the entrance to the Cera building that indicates the presence of cameras. In addition, BRS always respects the guidelines of the public service IBZ Safety & Prevention (www.besafe.be).

As a rule, Cera stores recordings from the surveillance cameras in and around the Cera building (marked with a sticker) for a maximum period of one month.

In some cases this can be longer:

- If the images recorded are useful for proving actions to demonstrate a (possible) crime or nuisance,
- To prove damage or to identify a perpetrator, a troublemaker, a witness or a victim,
- If someone has exercised their right to access, long enough to answer the question.

Do you have any questions about camera images? Then please contact BRS, facility & logistics management, Muntstraat 1, 3000 Leuven, [e-mail: cctvcera@cera.coop](mailto:cctvcera@cera.coop).

3.5. Non-targeted visual impressions

During BRS meetings and activities, images (photos and videos) giving an impression of what is going on can be recorded. Participants can be visible in these impressions, but BRS makes sure that they are not personally identifiable images. We can use these impressions on our website and in our publications.

4. How long does BRS retain your data?

4.1. Retention period

BRS does not retain your data for any longer than is legally permitted and necessary for the purposes for which your data are processed. How long certain data are retained depends on the nature of the data and the purposes for which they are processed.

Thus, the personal data required for the establishment and maintenance of the share register are kept for the entire duration of the company and up to five years after its liquidation, in accordance with Belgian company law.

4.2. What does BRS do with your personal data after the retention period has expired?

At the end of the retention period, your personal data will be deleted or anonymised. Anonymisation means that your personal data is stripped of all possible identifying characteristics. What remains are statistical data that can no longer be linked to your person in any way. These statistical data are important for BRS because they allow it to gain insight into the use made of its services and to optimise them for the future.

5. Does BRS share your personal data with third parties?

5.1. What BRS does not do

BRS does not sell your personal data. BRS also does not make your personal data available to third parties for marketing, sales and other business activities, except in the cases mentioned below.

5.2. What BRS does do

When BRS uses the services of a third party to process data on its behalf, it will opt for a processor in the European Economic Area (EEA) if there is such a choice, so that you can be sure that the legislation offers a high level of data protection (also see point 6 below).

BRS can directly or indirectly call on processors, such as:

- KBC Group NV, KBC Bank NV and CBC Banque SA (for financial documents);
- Measuremail (for sending e-zines);
- Propaganda NV, Content Makers BVBA and Omnilevel NV (for mailings and magazines);
- printers for the printing and addressing of, among other things, the invitations for General Meetings and documentation in preparation for the BRS activities such as Joos Hybrid (www.groupjoos.com);
- market research agencies such as Profacts (www.profacts.be) and Check market (www.checkmarket.com), both for the invitation for and carrying out of surveys;
- ICT service providers such as Microsoft, Cegeka and Delaware;
- companies that offer Platform as a Service (PaaS) and Software as a Service (SaaS) services in the cloud, such as the storage services of Microsoft Azure on which BRS uses platforms or software that process and store your personal data;
- companies for archiving and accessing information, for example Doccle;
- social media management tools;
- translators and translation bureaus;
- consultants.

6. Personal data outside the European Economic Area?

In principle, BRS itself does not process your personal data outside the European Economic Area (EEA).

Although BRS will opt for a processor in the EEA if there is such a choice, it is possible that the service providers working for BRS (see point 5.2 above) process your personal data outside the EEA. In this

respect, BRS will aim to achieve an appropriate and sufficient level of protection for your data, in particular by relying on an adequacy decision in accordance with article 45 GDPR for the country to which data is transferred, by concluding standard contractual clauses in accordance with article 46 (2) GDPR and/or by taking other appropriate safeguards in accordance with Chapter V of the GDPR.

7. Links to other websites and social media?

BRS' website can contain references to other websites (for example, via hyperlinks, social plug-ins, links to social media service providers) offered by other companies or by social media. BRS advises you to always check the privacy policies of these other websites or social media.

7.1. BRS' social media pages

When you visit our social media pages, certain personal data will be transferred to the social media service providers via cookies. Social media service providers can obtain information such as the websites you are currently visiting or have visited in the past and your IP address. We can receive aggregated data from these respective social media service providers in the form of statistics on how our pages are visited by social media users.

7.2. Social media share buttons

On our website, you can share content via social plug-ins. When you use these social plug-in functions (e.g. via the logos of the social media channels at the bottom of our website), information about your use of the website is sent directly from your browser to the social network concerned.

If you are already registered with a social network during your visit to our website, the social network can assign the visit to your personal account via the social plug-ins. If you are not yet a member of a social network, it is still possible that the social networks receive and store your IP address and information about your browser and the operating system you use via the social plug-ins.

If you share content from our website directly on the social media page, your personal data will be visible to the visitors of this social media. For the scope and purpose of the data collection and the further processing and the use of data by social networks and information about rights and settings to protect your privacy, please refer to the privacy policies of these social networks.

8. What are your rights?

You have the following rights with regard to the processing of your personal data.

Conditions can be attached to the exercise of certain rights or exceptions can exist for certain rights. For more information on how to exercise your rights, see point 9. "How can you contact BRS".

8.1. Access to your data

You have the right to request free inspection of the personal data that BRS processes about you. This means that you can request to know which of your personal data are registered and for what purposes we use these data.

8.2. Rectification of your data

You have the right to have your personal data corrected if the data are incorrect.

8.3. Right of objection

You can object to the processing of your personal data by BRS under certain conditions. You can object to the use of your personal data when the processing is based on BRS' legitimate interest.

In the e-mail campaigns we send you, you have the option of clicking the "unsubscribe" or "cancel" link to exercise this right of objection directly.

BRS will comply with the objection request unless there are compelling reasons not to do so, such as data processing in the context of the fight against fraud.

8.4. Right to withdraw your consent

In the event of processing personal data based on your consent, you can withdraw that consent. Withdrawing your consent does not affect the lawfulness of the processing that BRS has carried out prior to the withdrawal of your consent, or the processing of your personal data that we carried out on the basis of legal grounds other than your consent.

8.5. Right to erasure of data

A member who wishes his or her personal data not to be retained any longer, has the right to request that the data be erased without unreasonable delay. If BRS no longer has a compelling reason for processing your personal data, it will erase the data.

However, BRS cannot be obliged to erase personal data if the processing is necessary for compliance with legal obligations.

From the time of the request, BRS will refrain from any further processing of the personal data to be erased until the time of actual erasure from its systems.

As explained in point 7, BRS sometimes facilitates the publication of data (including personal data) via social media such as Twitter and Facebook. Please note that these channels have their own terms and conditions of use that you must observe yourself. Publication on social media can have (sometimes undesirable) consequences, also for your privacy or that of persons about whom you share data. It is possible that you may not be able to remove something you make public in the short term. So you have to assess the consequences yourself because you decide about publication on those media. BRS accepts no responsibility whatsoever for this.

8.6. Right to restrict data processing operations

In certain cases, you can ask us to restrict the processing of your personal data. For example, if you have submitted an objection to the processing of personal data for which BRS calls upon legitimate interest as the legal basis. In that case, you can exercise your right to restrict the processing of your personal data pending BRS' answer or BRS' legitimate grounds outweighing yours.

8.7. Right to data portability

In certain cases, you have the right to obtain your personal data, which you have personally provided to BRS, in a structured, commonly used and machine-readable form and to transfer the data to another data controller.

8.8. Right to lodge a complaint with a data protection authority

You have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your personal data if you believe that the rules of data protection are being breached. More information is available on the website of the competent data protection authority.

You can reach the Data Protection Authority by post at Drukpersstraat 35, 1000 Brussels and by e-mail at the following address: contact@apd-gba.be.

9. How can you contact BRS?

A member who wishes to exercise one or more of the rights described above can do so in writing at any time in one of the following ways:

- for **BRS vzw**:
 - by sending a letter to BRS vzw, Muntstraat 1, 3000 Leuven, Attn: Legal Department;
 - by sending an e-mail to info@brs.coop.
- for **BRS Microfinance Coop cv**:
 - by sending a letter to BRS Microfinance Coop cv, Muntstraat 1, 3000 Leuven, Attn: Legal Department;
 - by sending an e-mail to invest.brs@brs.coop.

Clearly indicate which right(s) you wish to exercise and provide your contact details so that we can respond to your request:

- your name
- your address
- your landline and/or mobile phone number
- your e-mail address
- your member number (for BRS Microfinance Coop members)

Please also date and sign your request.

BRS cannot process your request without proof of your identity (for example: a copy of the front of your identity card). After all, BRS must be able to verify whether it is indeed your own request.

BRS will examine, assess and carry out your specific request within the time limits set by law. Whether or not you can exercise your rights depends on the processing and the legal basis.

* * * * *