

Privacy & Cookie Policy

This is the Privacy and cookie policy of the website www.equimanager.com ("Website") and the Equimanager platform ("Platform"). This Privacy and Cookie Policy provides information on the processing of personal data of the visitors of the Website and users of the Platform (hereafter commonly referred to as "Users") and by Passion4IT gcv with its registered office at 8830 Gits, Torhoutsstraat 50.

This Privacy and Cookie Policy may be changed over time to keep up with the latest legal and technological developments.

This Privacy and Cookie Policy was last changed on 12 April 2017.

For the purpose of this Privacy and Cookie Policy the following capitalized words shall have the following meaning:

- "Personal data" means any information relating to an identified or identifiable person. A person is identifiable when the person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- "Processing" means any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, storage, organization, alteration, use, disclosure (including the granting of remote access), transmission or deletion of Personal Data.
- "GDPR" means regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

1. When does this Privacy and Cookie Policy apply?

The Privacy and Cookie Policy is applicable to the processing by Passion4IT of all Personal Data of Users through the Website and the Platform.

2. Who is responsible for your Personal data?

Passion4IT is the controller for the processing of your Personal data.

3. What data do we collect and how do we get these data?

We collect the following information you voluntarily and with consent submitted to us via a contact form:

- Your name;
- Your gender;
- Your birth date;
- Composition of your family;
- Your contact details, such as e-mail address, address, country and telephone number;
- Information regarding horse riding, such as the name of horse, manege, riding school, riding teacher and the riding experience.

We collect the following information we get from your use of our Website and the Platform

- Your IP address;

- Your location;
- Information on how you use our Website and Platform, such as the consulted pages, the duration of your visit, the fields you have filled out;
- Your correspondence with Passion4IT or the organisers of equestrian activities regarding the use of the Website and Platform.

4. How do we use these data?

A. For the technical and functional management and analysis of the Website

A.1 What does this purpose entail?

When you visit our Website or Platform, our website managers process a number of technical details associated with the use of the Website or Platform, so that we can provide their functionalities and generate usage statistics. These data allow them to manage the Website or Platform, for instance by resolving any technical faults or improving accessibility to certain parts of the Website or Platform, and to improve the content of our Website and your browsing experience. In turn, this allows us to ensure that you can reach the information on the Website and Platform quickly and easily. We also use cookies for this purpose (see also question: "What cookies do we use?").

A.2 Which Personal Data do we process for this purpose?

For this purpose we process technical Personal Data such as the IP-address of your computer, the webpages you visit, the fields you fill out, and the duration of a visit.

A.3 For what period do we retain your Personal Data for this purpose?

We retain technical data for a maximum period of five (5) years after your last use of the Platform.

A.4 On the basis of which legal ground do we process these data?

We process your Personal Data for this purpose on the basis of the legitimate interest of Passion4IT to gain insight in the use of its Website and Platform and to improve its Website and Platform.

B. To enable the organisers of equestrian activities to communicate with you regarding the subscribed activities

B.1 What does this purpose entail?

If you want to reserve specific time slots at a manege, or participate in an event or camp of the organiser of equestrian activities, you will subscribe to these activities through the Platform. We will share these Personal Data with the organisers of equestrian activities in order to enable them to contact you by e-mail, by telephone or by regular mail regarding these subscribed activities (including the cancellation, postponement or modification of the activity).

B.2 Which Personal Data do we process for this purpose?

For this purpose, we shall process your name, your gender, birth date, contact details, composition of the family, and all information regarding horse riding

B.3 For what period do we retain your Personal Data for this purpose?

We retain your Personal Data for a maximum period of five (5) years after your last use of the Platform.

B.4 On the basis of which legal ground do we process these data?

We process your Personal Data for this purpose on the basis of the legitimate interest of Passion4IT and the organisers of equestrian activities to communicate with you regarding the subscribed activities.

C. To enable the organisers of equestrian activities to send newsletters and other direct marketing

C.1 What does this purpose entail?

If you have ticked the box, we will share your Personal Data with the organisers of equestrian activities in order to enable them to send you newsletters and other direct marketing regarding their activities by e-mail or by regular mail.

C.2 Which Personal Data do we process for this purpose?

For this purpose, we shall process your name, your gender, birth date, contact details, composition of the family, and all information regarding horse riding

C.3 For what period do we retain your Personal Data for this purpose?

We retain your Personal Data for a maximum period of five (5) years after your last use of the Platform. If you unsubscribe to the newsletters of the organisers of equestrian activities, we will immediately cease the use of Personal Data for this purpose.

C.4 On the basis of which legal ground do we process these data?

We process your data for this purpose on the basis of your consent, because you have ticked the box that the organisers of equestrian activities could send you newsletters.

D. To answer your questions

D.1 What does this purpose entail?

If you get in touch with us via email (support@passion4it.com) or via one of the contact forms on the Website or Platform, we will use your Personal Data in order to reply and answer your question.

D.2 Which Personal Data do we process for this purpose?

For this purpose, we process your name, contact details, your correspondence with Passion4IT about your question and all other Personal Data you provide to us and which are necessary to answer your question.

D.3 For what period do we retain your Personal Data for this purpose?

Your Personal Data shall only be used to answer the questions. We retain your Personal Data for a maximum period of five (5) years after your last question.

D.4 On the basis of which legal ground do we process these data?

We process your Personal Data for this purpose on the basis of the legitimate interest of Passion4IT to improve the Website and Platform and answer your questions.

5. Who do we share your data with?

Passion4IT shall only share your Personal Data with the organisers of equestrian activities you have chosen in your settings of the Platform to share your Personal Data with or to whose activities you have subscribed.

In case the organisers of equestrian activities or Passion4IT make use of third party service providers (e.g. Mailchimp, Microsoft) which act as subprocessors of the organisers of equestrian activities or Passion4IT for sending communications or newsletters relating to their activities to the End User, Passion4IT shall also share Personal Data with these subprocessors.

Personal data will not be supplied or sold to any other third parties (e.g. for commercial purposes), except when required by law.

6. How are your data secured?

Your personal data are dealt with in strict confidentiality and Passion4IT has taken reasonable and appropriate technical and organisational security measures against its loss or unlawful processing. All Personal Data is stored by Passion4IT in the Microsoft Azure Cloud.

7. What cookies do we use?

A. What are cookies?

A cookie is a text file placed on your hard disk by a web server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. The purpose of a cookie is to tell the web server that you have returned to a specific page. When you return to the same website, the information you previously provided can be retrieved, so you can easily use the customised features.

B. What is the purpose of these cookies?

Passion4IT uses cookies to facilitate and improve your online experience and to personalise the content of the Website to your needs and preferences.

C. Which cookies do we use?

The Website of Passion4IT uses different kinds of cookies:

- **Functional cookies:** cookies that improve the convenience of your Website visit and improve the User experience.
- **Performance cookies:** cookies that gather information to evaluate and improve the content of our Website (e.g.: analytics).
- **Navigational cookies:** cookies that collect information about your computer and your visits to this Website such as your IP address, geographical location, length of visit and pages viewed.

Continuing your visit on our Website without adapting your cookie settings, indicates the approval of the cookies.

D. How can I manage these cookies?

Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies. If you choose to decline cookies, it is possible that some features on our Website or Platform do not work optimally.

Users can, at any time, delete the already installed cookies on their computer or mobile device as well using their internet browser's cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the 'Help' option in your internet browser for more details.

8. Right to withdraw your consent at any given time

You can withdraw your consent to the use of your Personal Data for newsletters and other marketing communication by the organisers of equestrian activities at any given time by modifying your choices and settings in the Platform ([link to the settings](#)).

9. What are your rights as a data subject?

1. You have at any given time the **right to request access** to Personal Data that you communicated to us. In such a case you have to send an e-mail to support@passion4it.com, accompanied by a proof of your identity. Passion4IT shall treat this request without undue delay and shall give all information in accordance with article 15 GDPR. You could also receive a copy of the Personal Data that we use.
2. You have at any given time the **right to request rectification of inaccurate Personal Data** that you communicated to us. In such a case you can modify your information directly in the Platform.
3. You have at any given time **the right to erasure of Personal Data that you communicated to us** (“right to be forgotten”). In such a case you have to send an e-mail to support@passion4it.com, accompanied by a proof of your identity. Passion4IT shall treat this request without undue delay and shall erase said Personal data if (i) the Personal Data are no longer necessary in relation to the purposes for which they were collected, (ii) you have withdrawn your consent and (iii) other grounds mentioned in article 17 GDPR apply.
4. You have at any given time the **right to restrict the processing of your Personal Data**. In such a case you can change the settings of the Platform ([link to the settings](#)).
5. You have at any given time the right to receive all your personal data in a structured, commonly used and machine-readable format and to transmit those to another entity without hindrance when our processing is carried out by automated means (“**right to data portability**”). In such a case you have to send an e-mail to support@passion4it.com, accompanied by a proof of your identity. Passion4IT shall treat this request without undue delay.
6. You have the right to lodge a complaint before the Belgian Data Protection Authority. Complaints can be sent to Drukpersstraat 35, 1000 Brussel.