

## **Privacy Policy Notice**

### **1. Introduction**

Protecting the privacy and security of your personal data ("personal data") is important to us. In compliance with the European Regulation 2016/679 of 27 April 2016 on the protection of individuals about the processing of personal data and on the free movement of such data (hereinafter the "European GDPR Regulation") as well as the Law of 30 July 2018 on the protection of individuals about the processing of personal data, we are committed to respecting the confidentiality of the personal data we collect. Personal data is any data that could be used to identify you or associated with you.

This Privacy policy Notice (the "Notice") details the different types of personal data we collect from you, directly or indirectly, and how and why we use them.

This Notice outlines:

- who is responsible for processing your personal data;
- how to contact us;
- the various legal bases that allow us to process your personal data;
- the different categories of personal data we collect;
- how we use your personal data;
- the purposes for which we collect your personal data;
- how we may share personal data;
- your rights and choices regarding the protection of personal data;
- the use of cookies and other similar technologies.

### **2. Data controller**

The party responsible for processing your data is AELITE CLUBS SRL, a company incorporated under Belgian law, whose registered office is located at Chaussée de Bruxelles, 463, 1410 Waterloo, registered with the Banque Carrefour des Entreprises under number BCE 0792.595.215 (hereinafter "AELITE CLUBS").

The contact details of our Data Protection Officer are as follows:

**E-mail:** [privacy@aeliteclub.be](mailto:privacy@aeliteclub.be)

**Tel.:** +32 2 759 59 69

If you have any questions or concerns about the way we're handling your personal data, do not hesitate to contact us. We have a one-month response time, but we'll try to get back to you as soon as possible.

If you feel that we have not responded sufficiently to your questions or concerns, you can contact the Belgian personal data protection authority:

<https://www.autoriteprotectiondonnees.be/citoyen>

AELITE CLUBS reserves the right to modify its privacy policy at any time. The most recent version is available on our website ([www.aeliteclub.be](http://www.aeliteclub.be)), which we invite you to consult regularly. All changes to our privacy policy will be posted on our website.

### 3. **Legal bases**

The legal bases on which AELITE CLUBS is authorized to process some of your personal data are the following:

- when you have given your consent;
- where processing is necessary for the performance of the contract you have signed with us;
- when the processing is necessary to comply with a legal obligation that we are obliged to respect;
- where processing is necessary for the purposes of our legitimate interests;
- when we are obliged to do so in the vital or public interest.

### 4. **Categories of personal data we collect and their purposes**

Personal data are collected when interactions take place between you and AELITE CLUBS. This may occur when you spontaneously contact us to find out more about the services and products we offer, when you are a member of AELITE CLUBS or wish to become a member, if you access our Club as a guest, if you visit our AELITE website ([www.aeliteclub.be](http://www.aeliteclub.be)) if as a member you use our AELITE (MyWellness) application or follow and respond to our posts on social networks.

#### a) General data

Generally speaking, when you contact us, via our AELITE website or otherwise, to find out more about the services and products we offer, AELITE CLUBS collects identification data (first and last name) and contact information data about you, such as your postal address, e-mail address, telephone number(s) and contact preferences.

Why do we need your contact information? We use your contact information to respond to your requests and to inform you about our products and services that may be of interest to you.

#### b) Data related to your membership and participation in our activities

When you become a member, we also process a range of additional information, including data such as birth, nationality, and gender, as well as information relating to your membership, such as the type of membership chosen, the applicable package, your reservations and access to the Club. When you register, we may also take a photo of you.

If additional documents are provided in support of your membership application, these will be retained in our files. If, during the term of your membership, documents are provided to us in support

of, for example, a relocation notice or, a request for cancellation or suspension of subscription, these documents will also be kept in our files.

We collect information relating to your payments, including your bank details. If goods and services are paid for by card and your payment card details are stored in our files.

The personal data we collect may also include information about your sporting activities as well as information about your participation at our events or courses.

Why do we need this information? This information enables us to manage the various aspects of your membership, communicate with you and monitor your sporting activities within the Club.

c) Data related to our AELITE website

When you visit our AELITE website ([www.aeliteclub.be](http://www.aeliteclub.be)) to learn more about the services and products we offer or when you register for our activities via our website, several data are automatically collected, such as your URL and IP address. Information about your use of our services about the way you use our services and your interaction with them through our website is also collected.

Why do we collect this data? This data enables us to analyse and gather information about the way you use our services and to improve the functionality of our website.

d) Video surveillance data

Video surveillance at our Club takes place at the entrance of the Club and in the gyms. There is no video surveillance in the changing rooms, sanitary facilities, offices, massage, and physiotherapy rooms.

Why do we use video surveillance? We use it for fraud prevention and detection, as well as to ensure the health and safety of guests, members, and staff.

The right to view video surveillance images is strictly reserved for AELITE CLUBS management (Cfr: Video law : <https://www.besafe.be/fr/loi-camera>)

e) Health data

Information relating to the health of our members is only collected with the express consent of the person concerned, in the context of health questionnaires and physical verifications. If you use the AELITE (MyWellness) application to create training plans and/or achieve your sporting goals, it is necessary to provide additional information such as your height, weight, goals, sporting preferences, planned and completed training sessions.

We may also need to process personal health data relating to our members, guests, visitors, and other persons who have access to the Club in order to comply with any regulations issued by the government, as was the case, for example, as part of the measures taken to fight the Covid-19/coronavirus pandemic.

f) Data related to the AELITE (MyWellness) application

The AELITE (MyWellness) application is accessible to members and plays a central role in your interactions with the Club. To use the AELITE (MyWellness) application, you must open a user account and enter your identification and contact details. When you use the AELITE (MyWellness) application, you can access the Club, manage your membership, book classes, connect to the various sport facilities while exercising and keep up to date with Club activities. The various items of information collected in this way are entered into our files and analysed.

Why do we collect your data? Your personal data are used to open your user account and then communicate with you, manage your account, and improve and personalize your sporting experience within our Club.

The interaction you make through the AELITE (MyWellness) application is analysed to ensure the functionalities which are necessary for our activities as well as for personalization and marketing purposes.

For further details on the privacy policy of the Apple Store and Google Play sites where our AELITE (MyWellness) application can be downloaded, please visit the following sites:

<https://www.apple.com/legal/privacy/en-ww/>

<https://policies.google.com/privacy?hl=en-US>

g) Social media

When you interact with AELITE CLUBS through the social media where we are present, we would like to draw your attention to the fact that the confidentiality of the personal data that you may communicate on this occasion is managed by the policy of the IT platform concerned. Under no circumstances can AELITE CLUBS be held responsible for the processing of your personal data by these platforms, which are third parties to us.

h) Information received from third parties

If your cell phone or tablet, via the AELITE (MyWellness) application, is connected to any of the Club's equipment, data is automatically transmitted to us by these devices, including any data of use from your access provider.

If your membership is linked to your employer, AELITE CLUBS may need to process your employee number.

## 5. **Management**

Your personal data is protected by the implementation of appropriate and reasonable technical and organizational measures to prevent the loss, misuse, or alteration of your personal data. The personal data you provide to us is stored on restricted-access servers with a secure data storage policy, to prevent unauthorized persons from accessing your secure data.

As the transmission of information via the Internet is inherently unsecured, we cannot guarantee the confidentiality and security of your data transmitted via the Internet.

## 6. **Sharing personal data with third parties**

Your personal data is shared only with subcontractors that AELITE CLUBS may call upon in connection with the products and services offered, who are located within the European Economic Area and who themselves undertake to comply with the European GDPR regulation. Under no circumstances the personal data we collect will be sold to third parties.

We share your bank and card details with our secured payment providers to process card transactions and direct debit payments.

We share your contact details and preferences with mailing companies, our marketing agencies, system providers and other distributors for the information we communicate to you.

We share contact and identification details with our media agents, search engine providers and social media platforms so that we can adapt our communications.

We may share attendance information with your employer if your membership is made through them.

We may share your data with third parties for the purposes of fraud protection and credit risk reduction, including debt collection measures.

#### **7. Storage of personal data**

We retain your personal data only for as long as is necessary for the provision of our products and services and for legitimate and essential business purposes, such as maintaining the performance of our AELITE website ([www.aeliteclub.be](http://www.aeliteclub.be)) and AELITE (MyWellness) application.

Your contact details are kept for a period of five years after your last interaction with AELITE CLUBS. Any correspondence you may send us will be kept in our archives for a period of five years.

Members' contact and identification data, usage, and attendance information, as well as information about the personal situation of the members are kept for a period of five years following the end of their membership, in order to be able to answer any questions you may have about your membership. Certain information may be kept for a longer period in the event of a duly justified reason.

Information about your communication preferences is stored indefinitely to avoid sending you unwanted information in the future.

Incident details are kept for three years after the date of the incident.

We retain your payment details for the duration of your membership and for five years following the end of your membership.

Video surveillance recordings are automatically deleted after 30 days, unless they need to be kept for specific purposes such as investigating an incident which took place at the Club.

#### **8. Cookies**

Cookies are information that are transmitted from our Web server to your Web browser and stored for your future visits to our site. This information enables us to render our products and services

more user-friendly, more efficient, and safer. Cookies are small text files that are stored on your computer and saved by your browser.

Cookies may be used to compile anonymous statistics related to the acceptance or use of services or goods to patterns of browsing. A third party collects this data on our behalf to measure the performance of our AELITE website. The information collected is aggregated for reporting purposes. The use of this service helps us to measure and improve the structure and ease of use of our AELITE website.

Cookies on our AELITE website do not collect any personal data. Our site can be consulted without cookies. When you visit our site for the first time, we ask you whether you accept cookies and give you the opportunity to define which cookies you allow.

Previously saved cookies can be deleted in your browser settings. Cookies provide an optimal browsing experience. Disabling them may reduce the functionality of our website.

#### 9. **Your rights**

You have several rights concerning the personal data we collect:

- The right to access your personal data and obtain a copy of the personal data we hold about you;
- The right to rectify your personal data if they are inaccurate and the right to complete your personal data if they are incomplete.
- The right to be forgotten, which is the right to request the deletion of your personal data if it is no longer required for the purposes for which it was collected;
- The right to limit or object to the processing of your personal data;
- The right to receive your personal data in a structured, commonly used, and machine-readable format;
- The right to request that we transfer your personal data to another organization, or to you, in certain circumstances;
- The right to lodge a complaint with the competent data protection authority.

If you wish to exercise your personal data rights, please contact us at [amaury.corthouts@aeliteClub.be](mailto:amaury.corthouts@aeliteClub.be) or by post.

#### 10. **Marketing**

We may use your personal data to send you marketing information about our products and services, such as newsletters, product updates, surveys, corporate communiqués and to invite you to events that may be of interest to you.

You may opt-out of receiving marketing messages at any time by following the unsubscribe links in all electronic communications from us. Please note that even if you choose not to receive marketing messages from us, we may still send you service-related communications if necessary.

#### 11. **Liability**

We are not responsible to you for any losses or damage you may suffer caused by any distributed denial-of-service attack, or any viruses, trojans, worms, logic bombs or other material which is malicious or technologically harmful and which may infect, contaminate or damage your computer equipment or computer programs, or cause damage to software or damage to or loss of data unless caused by our negligence.