

Personal data protection charter

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1. The purpose of this charter

Cartoonbase.com is a website owned by Cartoonbase Limited (hereinafter "we" or "Cartoonbase"). Your privacy is a priority for us.

We are therefore committed to respecting personal data, both of our customers, non-customers, and online users (hereinafter "you"), in accordance with the applicable regulations, in particular the European Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter: the "RGPD" and accessible at this [address](#)), and the law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (accessible this [address](#)).

This charter aims first and foremost to inform you about :

- the personal data we collect about you ;
- the purposes of this collection ;
- how we use them;
- your rights to your data, and how to exercise them.

2. Terminology

The Charter contains a number of terms that are worth defining.

<u>Personal data</u>	The data subject shall be considered to be an " <i>identifiable natural person</i> " if he or she 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 his or her physical, physiological, genetic, mental, economic, cultural or social identity" (Art. 4, 1) of the GDPR);
<u>Treatment</u>	"Any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" (Art. 4(2) of the RGPD);
<u>Person responsible for the processing</u>	"the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing operation; where the purposes and means of such processing are determined by Union law or by the law of a Member State, the controller may

	<i>be designated or the specific criteria for such designation may be laid down by Union law or by the law of a Member State" (Art. 4, 7) of the RGPD);</i>
<u>Recipient</u>	<i>The term "recipient" shall mean "the natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether or not a third party. However, public authorities which may receive personal data in the context of a particular enquiry in accordance with Union law or the law of a Member State shall not be regarded as recipients; the processing of such data by the public authorities in question shall be in accordance with the applicable data protection rules depending on the purposes of the processing" (Art. 4, 9) of the GDPR);</i>
<u>Subcontract or</u>	<i>The data controller is the "natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller" (Art. 4, 10) of the GDPR);</i>
<u>Customer</u>	<i>Any natural person with whom we have already established a relationship, whether that person is a consumer or a professional.</i>

3. The identity of the controller

The person responsible for the processing of the data is the limited company Cartoonbase, incorporated and existing under Belgian law, with its registered office at rue du Mail 13-15, 1050 Ixelles, Belgium, registered in the Belgian commercial register of companies (Crossroads Bank for Enterprises) under company number 0461.125.924.

4. The purposes for which your personal data is processed and the basis for this processing

You will find below a table showing the different purposes of our processing, their basis of lawfulness within the meaning of the RGPD, as well as their retention period.

Title of the purpose of the processing	Basis of lawfulness of the GDPR, data processed, manner of collection, retention period
Customer management	<p>The management of our customers involves the processing of personal data, in particular to collect their expectations and carry out operations relating to current contracts, invoices and accounting.</p> <p>These missions, as well as the management of our relationship in the broadest sense, involve the processing of some of their data:</p> <ul style="list-style-type: none"> • Personal identification data of the customer (natural persons) or of the customer's contact persons (legal persons), in particular surname, first name, title, function, company, telephone number, contact e-mail address, contact postal address, identity card if necessary; • Financial identification data (e.g. bank details, postal billing address); • All information relating to their involvement in the contractual relationship, as well as that of third parties • All the information needed to manage the file. <p>This purpose is based on the performance of a contract concluded with you (article 6.1.b of the GDPR).</p> <p>We collect this data from you.</p> <p>At the end of a client relationship, the client file is archived. Once a file has been archived, we keep it for five years, after which it is destroyed, with the exception of an electronic version kept for knowledge management purposes.</p>
Pre-contractual management of prospects (potential customers)	<p>Many messages are received on the contact address info@cartoobase.com, on the forms accessible on our site at https://cartoonbase.com/en/contact https://cartoonbase.com/fr/contact/ https://cartoonbase.com/nl/contact/, or via telephone contacts from legal entities and individuals. In order to be able to reply to these messages, it is necessary to process the personal data they contain, and in particular :</p> <ul style="list-style-type: none"> • Personal identification data of the customer (natural persons) or of the customer's contact persons (legal persons), in particular surname, first name, title, function, company, telephone number, contact e-mail address, contact postal address, identity card if necessary; • Financial identification data (e.g. bank details, postal billing address); • All information relating to their involvement in the potential contractual relationship, as well as that of third parties • All the information needed to manage the file. <p>This purpose is based on the lawfulness basis of collecting/processing data relating to contact persons within our legal entity prospects and natural person prospects, in our legitimate interest of developing our customer base, as well as the need to carry out the pre-contractual relationship (Article 6.1.b), and f) of the GDPR).</p> <p>We collect this data from you.</p> <p>From the moment the pre-contractual discussion ends, the personal data processed can have two fates:</p> <ul style="list-style-type: none"> - Or, if the potential customer becomes our customer, they are processed from that moment on within the framework of the purpose "Customer management"; - Or, if the potential customer does not become our customer, they are archived and kept for three years from the last action/reaction by the person concerned, after which we destroy them.
Knowledge management	<p>The management of our files leads to the production of knowledge (in particular the creation of graphic identities, know-how, etc.), which is kept after the archiving of the said files, in electronic form, in order to re-use them. The data concerned by this purpose are all the personal data mentioned in these documents.</p> <p>This purpose is based on the lawfulness of our legitimate interest in keeping personal data necessary for the accumulation of knowledge enabling us to carry out our activity (art. 6.1, f) of the GDPR).</p> <p>We collect this data from you.</p>

	This data, once archived, is retained.
Litigation management	<p>We process your data to manage our disputes with you and to defend our interests (disputes, legal action). The data processed in this context are :</p> <ul style="list-style-type: none"> • All data from the various other purposes • Data relating to offences, convictions or security measures, in particular: facts in dispute; information, documents and exhibits collected in order to establish the facts likely to be reproached; characteristics of the case; date, nature, reasons, amounts and any staggered sentences; comments relating to the description and follow-up of the procedure <p>This purpose is based on the performance of a contract concluded with You (Article 6.1.b), GDPR). We also have a legitimate interest in processing personal data in order to defend our interests, in particular but not exclusively in the context of a dispute or legal action (Article 6.1.f) of the GDPR)</p> <p>We collect this data from you.</p> <p>The retention period is 10 years from the starting point of the retention periods indicated for each purpose.</p>
<p>Marketing to customers and non-customers:</p> <p>Sending newsletters, promotional offers and displaying other communications (including when you browse our site) tailored to your profile;</p>	<p>We have a legitimate interest in processing the personal data of our Clients (including data obtained directly in the course of fulfilling our contracts with them) in order to inform them about our services.</p> <p>In application of article XII.13(1) of the Code of Economic Law and the Royal Decree of 4 April 2003, we process, after having obtained prior consent, personal data relating to the electronic contact details of non-customers with a view to informing them of the products and promotions available on the site.</p> <p>In order to offer you the most relevant experience possible, we may personalise your emails, browsing experience and other communications subject to obtaining your prior explicit consent (Articles 6.1.a) and 9.2.a) of the GDPR). For this purpose, your interactions with us will be analysed. These will only be used by us in a confidential manner.</p> <p>The retention period is 3 years from the last action/reaction by the data subject.</p> <p>We collect this data from you.</p>
<p>The statistics</p> <p>Any collection and processing of personal data necessary for statistical surveys or the production of statistical results. These statistical results may furthermore be used for different purposes, including the improvement of our websites, products and services. Statistical purposes imply that the result of the processing for statistical purposes does not allow any identification of the persons whose information has been used.</p>	<p>We have a legitimate interest in processing the personal data of our Customers in order to improve the websites, products and services offered and to have a better understanding of the target audiences (Article 6.1.f) of the GDPR).</p> <p>We collect this data from you.</p> <p>The retention period is 3 to 10 years depending on the initial purpose for which the data was collected.</p>
Sending out press releases	We have a legitimate interest in processing the personal data of journalists for the purpose of sending and publishing press releases (Article

6.1.f) of the GDPR).

The data processed in this context are :

- Personal identification data
- Electronic identification data
- Demographic characteristics

We collect this data from you or via the website of the company you work for or via online databases.

The retention period is 1 year from the date of knowledge of the end of the professional activity of the person concerned

5. Categories of recipients of your personal data

a. Subcontractors

To enable us to pursue the purposes described in point 4, we use certain subcontractors, of which the following categories are listed below.

Recipient category	Location of the subcontractor
Email service providers	United States
Online diary service providers	United States
Cloud storage and file sharing service providers	United States

In order to carry out certain processing operations, certain data are transferred within the European Economic Area, where personal data benefit from the same level of protection.

Some processing involves transfers outside the European Economic Area. In this case, we have ensured that the processor located in non-EEA countries:

- The jurisdiction of a state that ensures an adequate level of protection by virtue of an adequacy decision taken by the European Commission;
- Provides appropriate safeguards in compliance with the RGPD, such as
 - o signing the standard contractual clauses adopted by the European Commission for the transfer of personal data to processors established in third countries (2010/87/EU);
 - o the use of approved binding company rules or ;
 - o compliance with an approved code of conduct.

b. Third parties

To enable us to pursue the purposes described in section 4, we use certain service providers or other third parties, of which the following categories are listed.

Actors of justice (courts, administrative authorities, bailiffs, notaries, curators, experts...), professional orders, colleagues...)
Suppliers of products and services (consultancy, translation...)
Public authorities (law enforcement, O.N.S.S. obligations, tax administration, anti-money laundering...)
Transfer of companies (transfer of data from our clients to their buyers...)

6. Exercising your rights

a. Right of access

If your data is processed by us, you have the right to obtain the following information:

- Confirmation that your data is or is not being processed;
- The purposes of the processing ;
- The categories of personal data concerned;
- The recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients who are established in third countries or international organisations. In this case, you have the right to be informed of the appropriate safeguards with regard to such transfers;
- Where possible, the period of time for which the personal data are to be kept or, where this is not possible, the criteria used to determine this period;
- The existence of the right to request the rectification or erasure of personal data, or a restriction on the processing of personal data relating to the data subject, or the right to object to such processing;
- The right to lodge a complaint with a supervisory authority;
- Where personal data is not collected from you, any available information as to its source ;
- The existence of automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR and, at least in such cases, relevant information about the underlying logic and the significance and intended consequences of such processing for the data subject.
- A copy of the personal data being processed.

To exercise this right, please send us an e-mail to info@cartoonbase.com, indicating "RGPD - Right of access" in the subject line, together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a copy of your personal data in electronic format free of charge within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

b. Right of rectification

If you find that any personal data we process is inaccurate, you have the right to request that we correct/complete it.

To exercise this right, please send us an e-mail to info@cartoonbase.com, indicating "RGPD - Right of rectification" in the subject line, together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a reply within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

c. Right to erasure

You have the right to ask us to delete your personal data in the following cases:

- Personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- You object to the processing within the framework of the right to object (see, in this charter, the point relating to the exercise of this right);
- Your data is not processed in accordance with the legislation in force;
- Your personal data must be erased in order to comply with a legal obligation under Union law or the law of the Member State to which the controller is subject.

To exercise this right, please send us an e-mail to info@cartoonbase.com, indicating "RGPD - Right to erasure" in the subject line, together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a reply within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

d. Right to restrict processing

You have the right to have the processing restricted where any of the following apply:

- You dispute the accuracy of the personal data (for the period of time that we are able to verify the accuracy of your personal data);
- The treatment is contrary to the legislation in force;
- We no longer need your personal data for the purposes of processing, but they are still necessary for the establishment, exercise or defence of legal claims;
- You have exercised your right to object (during the verification of whether the legitimate grounds pursued by the controller prevail over those of the data subject);

In case of restriction of processing, your personal data will no longer be processed without your prior consent, except for storage, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or on important Union or Member State public interest grounds.

We will inform you of any such limitation, as well as of any lifting of such limitation.

To exercise this right, please send us an e-mail to info@cartoonbase.com with the subject line "RGPD - Right to limitation", together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a reply within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

e. Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on our legitimate interests.

You do not have the right to prevent us from further processing your data:

- If it is necessary for the performance of a contract with you ;
- If this is required by the legislation in force ;
- If the processing is necessary for the establishment, exercise or defence of legal claims.

To exercise this right, please send us an e-mail to info@cartoonbase.com, indicating "RGPD - Right to object" in the subject line, together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a reply within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

f. Right to portability

You have the right to request to receive your personal data that we process in a structured, commonly used and machine-readable format.

We are entitled to refuse this request for processing of personal data necessary for the performance of a contract with you.

To exercise this right, please send us an e-mail to info@cartoonbase.com, indicating "RGPD - Right to portability" in the subject line, together with a copy of the front of your identity card.

You can also exercise your right by contacting us via our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

Unless you specify otherwise, you will receive a reply within 1 month of receiving the request. This period will be extended by 2 months if the request requires further research or if we receive too many requests.

7. Contacts and complaints

Any questions about the processing of your personal data can be sent to the following e-mail address: info@cartoonbase.com, or to our postal address: Cartoonbase, rue du Mail 13-15, 1050 Ixelles.

If you believe that we are not processing your personal data in accordance with the GDPR and/or applicable Belgian law, you have the right to lodge a complaint with :

- The data protection authority of the European country in which you normally reside, or
- The data protection authority of the European country in which you work, or
- The data protection authority of the European country where the breach of the GDPR occurred

The contact details of all data protection authorities are listed on the [next page](#).

The postal address of the Belgian Data Protection Authority is Data Protection Authority, rue de la Presse 35, 1000 Brussels. You can also contact it by the means listed on the [following page](#).

8. Changes

This policy is subject to change, particularly to take into account any legislative or regulatory changes and internal changes at Cartoonbase.

We invite you to consult this policy regularly so that you are always aware of how your personal data is processed and protected.

Date of the last modification of this charter : [10/01/2021].