

OGON CONSULTING SERVICES
GDPR Policy

Version *1.1*
01/01/2024



VERSION HISTORY

Version #	Implemented By	Revision Date	Approved By	Approval Date	Reason
1.0	<i>Jasper Deneut</i>	<i>25/05/2018</i>	<i>Jasper Deneut Cedric Henrion Thibaut Van Breugel</i>	<i>25/05/2018</i>	Initial GDPR Policy
1.1	<i>Jasper Deneut</i>	<i>01/01/2024</i>	<i>Jasper Deneut Cedric Henrion Thibaut Van Breugel</i>	<i>01/01/2024</i>	Revision of policy for use of questionnaires

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1. Introduction

Ogon Consulting Services is committed to protecting and respecting your privacy. This GDPR Privacy Policy explains how we collect, use, and protect the personal data you provide to us, and outlines your rights under the General Data Protection Regulation (GDPR).

2. Data Processors

Jasper Deneut, shareholder and managing partner of Ogon Consulting Services, has been appointed by the board of managing partners to be acting Data Protection Officer. He can be contacted at jasper.deneut@revolv.be.

Multimedium srl, with its registered office at Minderhoutsestraat 1, 2320 Hoogstraten, Belgium, is the data processor responsible for the personal data collected and processed through our website and Microsoft applications.

Walto srl, with its registered office at Avenue du Printemps 31, 1410 Waterloo, Belgium, is the data processor responsible for the personal data collected and processed through our questionnaire application.

3. Data We Collect

We may collect and process the following data about you:

- **Personal Identification Information:** Name, address, email address, phone number.
- **Professional Information:** Job title, company name.
- **Usage Data:** Information about how you use our website and services.
- **Technical Data:** IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

4. How We Collect Data

We collect data from you through:

- **Direct interactions:** When you fill out forms, subscribe to our services, or contact us.
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- Automated technologies: As you interact with our website, we collect data using cookies and other similar technologies.

5. Use of Personal Data

We use your personal data to:

- Provide and manage our services.
- Communicate with you regarding your account or services.
- Improve our website and services.
- Comply with legal obligations.

6. Legal Basis for Processing

We process your personal data based on the following legal grounds:

- **Consent:** When you have given explicit consent for us to process your personal data for a specific purpose.
- **Contract:** When processing is necessary for the performance of a contract with you.
- **Legal Obligation:** When processing is necessary for compliance with a legal obligation.
- **Legitimate Interests:** When processing is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

7. Data Sharing and Disclosure

We do not sell, trade, or otherwise transfer your personal data to outside parties except as described in this policy. We may share your data with:

- Legal authorities: When required to comply with legal obligations or protect our rights.

8. Data Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction.

9. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general:

- If you consented to be informed about our services we will keep your data unless you withdraw your consent.
- When processing of your data is necessary for the performance of a contract with you and/or your company we will keep your data until the contract is terminated.

Specific cases:

- When you use our questionnaires to get feedback on your personality, skills, company culture or functioning of your company, we keep your data for 1 year after sending you the report (in case any progress or adapted reporting should be necessary).
- When you use our questionnaires to give feedback on the personality or skills of another person (e.g. colleague, client, manager, etc), or on your company culture or functioning, we keep your data for 6 months after sending the report to the person or company involved (in case any progress or adapted reporting should be necessary).
- After the periods mentioned above the data that allow to identify you will be automatically erased from our database.

10. Your Rights

Under GDPR, you have the right to:

- Access your personal data.
- Rectify inaccurate or incomplete data.
- Erase your personal data (right to be forgotten).
- Restrict the processing of your data.
- Object to the processing of your data.
- Data portability.
- Withdraw consent at any time (where processing is based on consent).

To exercise any of these rights, please contact us at info@revolv.be

11. Changes to This Policy

We may update this GDPR Privacy Policy. We will notify you of any changes by posting the new policy on our website. You are advised to review this policy periodically for any changes.

12. Contact Us

If you have any questions about this GDPR Privacy Policy or our data practices, please contact us at:

Ogon Consulting Services

Avenue Nippone 1 boîte 1

1160 Auderghem

Belgium

info@revolv.be

GDPR POLICY approval

The managing partners acknowledge they have reviewed the **GDPR POLICY** . This policy will be evaluated yearly. Changes to this policy will be coordinated with and approved by the managing partners.

Name: _____ Date: 01/01/2024
 _____ Thibaut Van Breugel
Title: _____
 _____ Managing Partner
Role: _____

Name: _____ Date: 01/01/2024
 _____ Cedric Henrion
Title: _____
 _____ Managing Partner
Role: _____

Name: _____ Date: 01/01/2024
 _____ Jasper Deneut
Title: _____
 _____ Managing Partner
Role: _____
 _____ Acting Data Protection Officer
