



# Data Privacy Policy

## 1/ Data controller

This data privacy policy provides you with detailed information about the protection of personal data with:

**WAPA – World Apple and Pear Association**

Rue de Trèves 49-51, bte 8

1040 Brussels

Belgium

The purpose of this privacy policy is to inform you of the personal data (hereinafter referred to as “personal data”) that we use, the reasons for which we use and share them, the length of their retention and the terms of use and the exercise of your rights in terms of this data.

Additional information will be provided if necessary when you subscribe to a particular product or service.

## 2/ Who is our data protection policy aimed at?

This policy is intended for users of our websites, our customers, former customers and the people we prospect who are interested in our services and products.

## 3/ What categories of data can we process?

We only collect and use the personal data that we need in the course of our business, enabling us to offer you personalised and quality products and services.

We may collect different categories of personal data from you, including:

- Identification information (for example; last name, first name);
- Contact information (for example postal address and email address, phone numbers);
- Tax information (e.g. VAT number, reference country);
- Banking, financial and transaction information (for example your bank details, your purchase history and payments);
- Data about your habits and preferences:
  - Data related to the use of our products and services (e.g. language of use, personalised messages, interests).
  - We may record certain information based on cookies that we deposit. For more

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information please refer to our statement about the use of cookies.

## 4/ What do we use your data for and what is the legal basis of this processing?

We use your personal data:

- With your authorisation (legal basis: article 6a of regulation 2016/679 (GDPR))
  - When you ask us questions via the contact and support procedures that have been implemented.
  - For sending newsletters to which you have subscribed.
- In order to fulfil contracts (legal basis: article 6b of regulation 2016/679 (GDPR)):
  - For the tracking and processing of your orders and registrations.
  - For providing you with information about our products and services;
  - For tracking and handling complaints and returns.
  - For general customer management including accounting, litigation and litigation management, the recovery or transfer of receivables and the protection of our rights in general.
- When we have a legitimate interest, as part of our marketing activities. In such a case, we always ensure we maintain a certain balance in terms your private life (legal basis: article 6f of the regulation 2016/679 (GDPR)):
  - To inform you of our products and services, potentially based on your marketing profile.
  - To prevent and combat possible fraud and abuse.
- In order to fulfil the legal obligations to which we are subject (legal basis: article 6c of regulation 2016/679 (GDPR)):

### WORLD APPLE AND PEAR ASSOCIATION

av. de Broqueville 272 bte 4 • 1200 Brussels • Belgium • Tel : +32 2 777 15 80 • Fax : +32 2 777 15 81 • e-mail : [wapa@wapa-association.org](mailto:wapa@wapa-association.org)

[www.wapa-association.org](http://www.wapa-association.org)



## 5/ Can your personal data be transferred to third parties?

Your personal data may be shared with our subcontractors for services on our behalf (e.g. external call centres, advertising agencies, IT providers, IT, clouds, etc.) and only if we have given instructions for this.

## 6/ Data transfer outside the “EEA” European Economic Area

Your personal data is not shared outside the European Union.

## 7/ How long do we keep your personal data for?

We keep your personal data for the longest period of time that is needed to comply with the applicable legal and regulatory provisions.

Other timeframes may be applied:

- Either to due to operational constraints such as good account management, or effective customer relationship management;
- Or to respond to claims in court or from a regulator.

In terms of customers, most of the information is kept for the duration of the contractual relationship and for a maximum duration of 10 years after the contractual relationship ends.

For inactive prospects, the information is kept for a maximum of 3 years.

## 8/ How do we protect your personal data?

Your personal data is treated confidentially. We make every effort to take the necessary technical and organisational measures to ensure the safety of this data.

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## 9/ What are your rights? How can you exercise them?

In accordance with the applicable regulations, you have various different rights, namely:

- Right of access: you can obtain information concerning the processing of your personal data as well as a copy of this personal data.
- Right of rectification: if you believe that your personal data is inaccurate or incomplete, you can demand that your personal data be modified accordingly.
- Right to deletion: you can demand that your personal data be deleted.
- Right to the limitation of processing: you can request that the processing of your personal data be limited.
- Right of opposition: you can oppose the processing of your personal data, for reasons connected to your personal circumstances. You have the absolute right to oppose the processing of your personal data for the purposes of direct marketing, including profiling related to this direct marketing.
- Right to withdraw your consent: if you have consented to your data being processed, you have the right to withdraw your consent at any time.
- Right to the portability of your data, when this right is applicable, you have the right to insist that the personal data you have provided us with is returned to you or, where technically possible, transferred to a third party.

You may exercise the rights listed above by contacting us by email at [wapa@wapa-association.org](mailto:wapa@wapa-association.org) or by sending us a letter to WAPA – World Apple and Pear Association; Rue de Trèves 49-51, bte 8; 1040 Brussels; Belgium.

In accordance with the applicable regulations, you are entitled to lodge a complaint with the competent supervisory authority.

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## 10/ How can you view the changes that have been made to this data privacy policy?

We regularly update this privacy policy and invite you to check it regularly.

## 11/ How to contact us

If you have any questions regarding the use of your personal data as referred to in this privacy policy, you can contact our CPO by post addressed to:

**WAPA – World Apple and Pear Association**

Rue de Trèves 49-51, bte 8

1040 Brussels

Belgium

Or by email:

[wapa@wapa-association.org](mailto:wapa@wapa-association.org)

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