

Privacy statement

This Statement describes our practices for the data processing activities set out below. This Privacy Statement applies to all customers and prospective customers of Belgium Tower Partners as well as to any visitors to or users of our website (“Website”), or any person that engages with us whether or not customers of Belgium Tower Partners. Please read this Privacy Statement carefully to learn how we collect, use, share and otherwise process your Personal Data (as defined below), and to learn about your rights and choices regarding our processing of your Personal Data.

A reference to Belgium Tower Partners is a reference to the Belgium Tower Partners NV and all its subsidiary undertakings and member entities (collectively, “Belgium Tower Partners”, “Belgium Tower Partners Group”, “we” or “us”).

For the purposes of this Privacy Statement, “Personal Data” means any information that identifies you, that could be used to identify you or that relates to you, and that you submit about you when interacting with us and/or is otherwise collected by us when you visit the Website, by phone, e-mail, writing or in another manner.

Processing activities

During our relationship with you we may collect and process your Personal Data, such as your name, address, telephone, email and other contact details, and any other data relating to you which you may provide, during the following activities:

1. When you visit the Website

a. What personal data is being processed and why?

When you visit our Website or use our services, we may process Personal Data without you actively submitting such information, by automated means, using technologies

<https://www.belgiumtowerpartners.com/>

such as cookies, web server logs, web beacons, and similar technologies on our Website. Such Personal Data are processed to obtain information about your visit to the Website and to further optimize our services.

Belgium Tower Partners uses cookies and other technologies to collect amongst others

- IP address;
- when this Website is visited;

To learn more about our use of cookies, we refer to the section on cookies below.

b. What is the legal basis for the processing?

The processing of Personal Data by visiting our website is based on your consent to the activation of our cookies (Art. 6(1)(a) GDPR). You can always withdraw your consent by deactivating cookies in our cookie banner.

2. When reaching out to us or sending us a request

a. What personal data is being processed and why?

To allow communicating with you when receiving a question or a request, we process the following categories of personal data:

- Your identity data (such as name, address, function/title, telephone, mobile numbers, email address);
- Identity and message data, e.g. through the 'Get in touch' form on our Website, the data included in the request (e.g. your name, e-mail address and message);
- Complaints and enquiries.

b. What is the legal basis for the processing?

The processing of your personal data for this purpose is based on our legitimate interest to enable us to provide you with good service and to be able to answer your request. When you contact us with a request, it is also in your interest that we process your personal data in order to provide you with the information and service that you have requested. Furthermore, the personal data is necessary for us to be able to satisfy and answer your request (all Art. 6(1)(f) GDPR).

3. When participating in a promotion, event, survey or other marketing campaign we organize, or when signing up for newsletters

a. What personal data is being processed and why?

To allow us to contact you for the purpose of a promotion, an event, a survey, marketing campaigns or newsletters, we process the following categories of personal data:

- Your identity data (such as name, address, function/title, telephone, mobile numbers, email address);
- Survey responses provided;
- Data related to your preferences to receive newsletters and/or information relating to events and promotions.

b. What is the legal basis for the processing?

The processing of Personal Data for purposes related to promotions, events, surveys, or marketing campaigns or newsletters is based on your consent (Art. 6(1)(a) GDPR). You can always withdraw your consent by contacting us at the contact information provided in section 5 or by using the link to unsubscribe from further marketing e-mails provided in each marketing email we send you.

4. When you enter into a contract with us and purchase our services

a. What personal data is being processed and why?

To allow us to provide the services, including access to the applicable space within the relevant data centre and communicate with you in this regard, to efficiently manage our customer relationship, to manage your accounts, orders, invoices and payments, to administer accounting and taxes, to manage and provide after-sale services, to provide operational maintenance and support, to provide a secure service, we process the following personal data:

- Your identity data (such as name, address, function/title, telephone, mobile numbers, email address)
- Details of contact persons (such as name, address, function/title, telephone numbers, e-mail address)
- Identity data of third parties you provide to us (such as name, address, function/title, telephone, mobile numbers, passport, email address)
- Services provided
- Financial data:
 - Financial and payment data such as banking details, invoices and payment terms as well as any Personal Data for fulfilling and legitimate processing billing information
- Tax identification number where you request services that require such information

b. What is the legal basis for the processing?

The processing of your personal data to perform services/deliver goods and communicate with you in this regard is necessary to fulfil the agreement we enter into with you (Art. 6(1)(b) GDPR). If you do not provide your personal data in connection with the purchase, we will not be able to administer your purchase or deliver in accordance with your order. The processing of your personal data for the purposes of being able to follow-up on your order and handling issues and requests is based on (i)

our legitimate interest to provide you with good customer service (Art. 6(1)(f) GDPR), and (ii) in certain cases, depending on the type of request made, our obligation to fulfil the agreement entered into with you regarding the purchase (Art. 6(1)(b) GDPR).

5. When you apply for a position at Belgian Tower Partners

a. What personal data is being processed and why?

For the purpose of candidate selection, placement and employment, we process the following Personal Data:

- Your identity data (such as name, address, function/title, telephone, mobile numbers, passport, email address)
- Other information you provide us when you are applying to work for Belgium Tower Partners, such as cover letters or CV's.

b. What is the legal basis for the processing?

The processing of your personal data is necessary for the performance of a contract with you (such as an employment contract) or in order to take steps at your request prior to entering into such a contract (Art. 6(1)(b) GDPR). The processing of Personal Data for purposes not strictly necessary to take steps to enter into a contract is based on your consent (Art. 6(1)(a) GDPR).

How long do we keep your Personal Data for?

Unless otherwise prescribed by applicable law or an agreement with you, we will store your personal data no longer than it is necessary for the purposes for which they were collected or otherwise processed as specified in this Privacy Policy. When the said purposes are achieved, we will delete your personal data, unless the applicable law sets a longer minimum period for which we must retain your personal information.

Hereunder you can find a more detailed presentation of the storage periods as applied by us:

Type of processing	Time period or criterion for determining the storage period
Personal data collected in connection with your visit to the website.	One (1) year (provided you do not withdraw your consent).
Personal data being processed in connection with your requests and enquiries	One (1) year.
Personal data used for sending out marketing material related to newsletters, promotions, events, etc.	One (1) year initially (provided you do not withdraw your consent). Thereafter, you will be asked annually whether or not you wish that we continue the processing of your personal data in accordance with the above. If you do not wish continued processing or if you do not answer the request within the time frame stated in the request, your personal data will be deleted.
Personal data processed in relation to the performance of a contract	Twenty (20) years from the termination of the contract.
Personal data processed in relation to the application for a position at Belgian Tower Partners	Up to one (1) year after closing the selection process, after which it will be deleted. If you are joining our team then your data may be kept for as long as required for employment purposes in accordance with our Retention Policy.

What happens when you provide us with Personal Data about third parties?

If you provide us with Personal Data about third parties, you warrant, represent, and undertake that you have complied with applicable data protection laws including informing and obtaining all necessary consents and approvals for the provision of

such Personal Data to Belgium Tower Partners and the processing by Belgium Tower Partners of this Personal Data as described in this Privacy Statement.

Do we share your Personal Data?

Our policy is to not give, sell or otherwise distribute Personal Data we collect to third parties outside of Belgium Tower Partners, except where required with your explicit consent or where this is necessary and in accordance with applicable law. In line with this, we share Personal Data with the recipients listed below.

- **Belgium Tower Partners Group members.** We may share your Personal Data with members of the Belgium Tower Partners Group. For the purposes specified under the “Use of Collected Personal Data” section previous and as described under the “International Data Transfers” section in this document. Members of the Belgium Tower Partners Group may use Personal Data collected through the web form on the Website, for example, to respond to those individuals who request company information regarding the member or who submit other requests or questions regarding the member.
- **Third party service providers.** Your Personal Data may be disclosed to third party service providers, acting on our behalf, in connection with managing services, data analytics, finance, accounting or other administrative services and information technology support. These third party service providers will have access to – and process – Personal Data only on our behalf and under our instructions and will be held to appropriate security obligations. For example, if you are interested to join Belgium Tower Partners and you have provided your data on the ‘Get in Touch’ form on our website, your data can be shared with other members of the Belgium Tower Partners Group and third party organizations providing recruitment, selection, placement and employment services. Such third parties will use candidate information only in connection with such services, and applicable law.
- **Other data recipients.** For the above purposes or where otherwise required by law, we may also need to make Personal Data available to third parties such as advisors, banks and financial institutions, professionals, independent

consultants, potential or existing investors, acquirers and/or Joint Venture partners (in connection with a merger, acquisition, sale or Joint Venture involving all or any part of the Belgium Tower Partners Group or as part of a corporate reorganization, stock or asset sale, or other change in corporate control), regulatory and/or administrative authorities, courts, police authorities.

You should also be aware that we may disclose specific information about you if necessary to do so by law, or based on our good faith belief that it is necessary to conform or comply with the law, or it is necessary to protect the users of this Website, of our services or the public. Belgium Tower Partners may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders, when required to do so by law, for example under a court order, or in response to properly made court or administrative demands. Belgium Tower Partners may also provide information for the purpose of safeguarding national security. In either case, Belgium Tower Partners will act in accordance with applicable data protection law.

We may also disclose Personal Data about you when you explicitly consent to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by your interests or fundamental rights and freedoms, in accordance with applicable laws.

We may share with third parties certain pieces of aggregated, anonymized data, such as how our customers use our services or Website. Such information would not identify you individually.

Third party management

Belgium Tower Partners ensures third party privacy compliance through a third-party risk assessment process to ensure appropriate privacy checks are done. Once the privacy due diligence is positively completed, prior to sharing any Personal Data with third parties, a data processing agreement containing requirements stipulated in Article 28 of the GDPR is executed between the parties. If it concerns a transfer of

Personal Data outside the EEA, the “International Data Transfers” section below provides more information on how we deal with this. Furthermore, Belgium Tower Partners may carry out audits to check third party privacy compliance.

International Data Transfers

In the performance of our contract with you or in providing our services or Website to you, we may need to transfer your Personal Data to third parties that are located outside the European Economic Area (“EEA”) where different privacy rules apply. In any case, as per Article 45 and 46 of the GDPR, we will only transfer Personal Data to recipients that provide an adequate level of data protection or as permitted by applicable data protection laws by implementing appropriate safeguards, including, but not limited to, relevant data transfer agreements like the European Commission-approved Standard Contractual Clauses. These clauses are contractual commitments between companies transferring Personal Data, binding them to protect the privacy and security of the data and to assure that Personal Data is processed with the same level of protection that in the European Union. In addition, we will implement supplementary measures necessary to ensure an adequate level of protection.

Security procedures

We establish and maintain adequate security procedures to protect the security and integrity of your Personal Data. Belgium Tower Partners will ensure that appropriate policies and technical and organizational measures in place, reflecting the current security landscape, to safeguard and protect your Personal Data against unlawful or unauthorised access, accidental loss or destruction, damage, unlawful or unauthorised use and disclosure. We will also take reasonable precautions to ensure that our employees who have access to Personal Data about you have received adequate training.

Your rights

In accordance with applicable data protection law, you have the following rights:

- **Right to Access your data:** Obtain confirmation of the existence of, and to request a written copy of the Personal Data Belgium Tower Partners holds about you;

- **Right to Rectification:** Have any inaccurate information about you corrected;
- **Right to Information:** Receive information on how Belgium Tower Partners processes your data
- **Right to Erasure:** Have Personal Data we hold about you deleted, blocked or removed;
- **Right to Object:** Object to the use of your personal data based on our legitimate interest
- **Rights related to Automated Decision-making and Profiling:** Right not to be subjected to automated decision-making or profiling that produces legal effects or significantly affects you;
- **Right to Restrict:** Restrict the processing we make in relation with your Personal Data;
- **Right to Data Portability:** Receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format in order to transmit them to another data controller; and
- **Right to Lodge a Complaint:** Lodge a complaint with a Supervisory Authority, if you consider that the processing of your Personal Data by Belgium Tower Partners infringes applicable data protection law.

In case you wish to exercise any such rights, please send a request to privacy@BelgiumTowerPartners.com. Or when you want to lodge a complaint with a Supervisory Authority, please do so at the Belgian Data Protection Authority.

Contact

If you have any questions or queries about how we process your Personal Data, or if you wish to exercise your Rights (e.g. to access, delete or to object to the processing of your Personal Data) you can contact us by sending an email to Privacy@BelgiumTowerPartners.com.

Changes to this Statement

If elements of our Privacy Statement change, we will inform you by updating the Privacy Statement in this Website.

This statement was last updated: 25 August 2022

Cookies

This website uses a browser feature known as a “cookie”, which assigns a unique identification to your computer or mobile device. It allows this website to “remember” your actions or preferences over a period of time, or it may contain data related to the function or delivery of the site. Cookies are used by this website to help track your selections as you navigate the pages within this website. Cookies may also be used to determine your browser plug-ins, so that we may optimize your experience on our website. Cookies can be set by Belgium Tower Partners or in some cases by third party services Belgium Tower Partners allows to present other information, run content or provide other functionality such as analytics.

Categories of cookies

The cookies we use on our website are organized into a number of categories which are described below. Some cookies have to be used on our website as they enable it to function. These are known as Essential cookies and functional cookies, which as turned on by default.

All other cookies are switched off unless you choose to accept them on our website. Where you accept cookies, your consent is valid for a period of 1 year. We will remind you once every year to reconfirm your preferences, if you have not already done so within the preceding year.

Essential cookies

These cookies are necessary for purely technical reasons for a normal visit to the website. Given the technical necessity, only an information obligation applies, and these cookies are placed as soon as you access the website.

Functional cookies

You cannot refuse these cookies if you wish to browse this website, but they are only placed after a choice has been made regarding the placement of cookies.

Analysis Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

How to manage cookies

These are cookies that allow us to know how many times a specific page has been visited. We only use this information to improve the content of our website. These cookies are only placed if you accept their placement. Your preferences can be modified through our cookie banner.

Cookie overview

The table below explains the cookies we use and why.

Provider	Name	Purpose
https://www.clarity.ms	MUID	Identifies unique web browsers visiting the Belgium Tower Partners website
https://c.clarity.ms		
https://f.clarity.ms		
	_clsk	Session cookie: Connects multiple page views by a user into a single Clarity session recording.
	_clck	Persistent cookie: Persists the Clarity User ID and preferences, unique to that site, on the browser. This ensures that behaviour in subsequent visits to the same site will be attributed to the same user ID.
	CLID	Identifies the first-time Clarity saw this user on any site using Clarity

Provider	Name	Purpose
https://www.google-analytics.com	<code>_ga</code> <code>_ga*</code>	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.

Google Analytics registers a unique ID that is used to generate statistical data on how the visitor uses the website. This is used additionally by Google Analytics to throttle request rate. Google collects anonymous statistics on a user's visits to the site, such as number of visits, average time spent on website and what pages have been viewed. Please note: IP Anonymisation is enabled on our Google Analytics platform, meaning that IP information automatically collected by Google is neither available, visible or actionable for anyone at Belgium Tower Partners. Google Analytics 4 is applied for this purpose. More information on Google Analytics 4 can be found [here](#). Microsoft Clarity does not collect IP address, it does register a unique ID to link to session and persistent cookies and also generates statistical data on how the visitor uses the website. More information on what data is collected by Microsoft Clarity can be found [here](#).

Please note if you have disabled cookies on the browser or in the cookie settings of this website, Clarity or Google Analytics do not set cookies.

Changes to this Statement

If cookies are added or deleted or we change the way we process them, we will inform you by updating the Cookie Statement in this website.

Privacy statement

If you have any questions or queries about how we process your personal data, or if you wish to exercise your rights (to access, delete or to object to the processing of your personal data) please read our privacy statement.

Still have questions?

If you have any question, you can contact us at privacy@BelgiumTowerPartners.com

<https://www.belgiumtowerpartners.com/>