



Privacy Statement

Marketing activities

We respect your privacy

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1. Introduction

Helan attaches great importance to the protection of your privacy, and endeavours to process (your) personal data in a lawful, fair and transparent manner. The purpose of this statement is to inform you about how Helan processes personal data.

More information about privacy legislation can be found on the website of the Belgian Data Protection Authority: www.dataprotectionauthority.be.

2. Controllers

Helan Onafhankelijk ziekenfonds (Health Insurance) Boomsesteenweg 5 - 2610 Wilrijk Enterprise number: 0411.696.011	Helan Huishoudhulp (Household help) Boomsesteenweg 5 - 2610 Wilrijk Enterprise number: 877.059.944
Helan Kinderopvang (Childcare) Boomsesteenweg 5 - 2610 Wilrijk Enterprise number: 0464.151.037	Helan Zorgwinkel vzw (Healthcare shop) Boomsesteenweg 5 - 2610 Wilrijk Enterprise number: 0420.367.316

Hereafter collectively referred to as Helan, each acts independently as controller for the following processing operations which are part of their daily marketing activities.

In accordance with the European General Data Protection Regulation of 27 April 2016 (GDPR), we have appointed a data protection officer (DPO). Our DPO can be contacted via e-mail at privacy@helan.be, by post to Gistelsesteenweg 294, 8200 Bruges, or via our website.

3. Why and on what basis are your data processed?

Helan processes all personal data, of both customers and service providers, prospects or third parties necessary to achieve the following primary objectives in the context of:

- managing your customer file
- complying with the legal or regulatory provisions to which it is subject
- and/or in the context of its legitimate interest, always balancing this legitimate interest against respect for your privacy.

If the processing of your personal data is not necessary on account of any of the above reasons, we will explicitly request your consent. For example, when placing cookies (external and internal with the exception of the strictly necessary cookies), we ask for your express consent using the cookie banner.

In particular, we process your personal data for the following purposes:

3.1. Personal commercial approach:

- Such as sending letters, leaflets, newsletters or emails that contain a personalised offer.
- Displaying personalised offers on our website or mobile apps and those of our partners.
- Delivering targeted ads after you have visited our website (retargeting).
- More information about our cookie policy and our partners can be found on our website: <https://www.helan.be/en/about-us/legal-info/cookie-statement/>

In order to offer you the most relevant products and services, and based on our legitimate interest, we may:

- Analyse information from you that we collect when you visit our website, for instance.
- Analyse your potential needs for our products or services (for example, we may contact you to discuss products or services that match your profile).
- Incorporate your user behaviour regarding our products and services in our analyses (e.g., reimbursement in the context of supplementary benefits).
- Identify key moments when specific financial products or services are relevant to you (such as the birth of your child, your first job, etc.).
- Form a picture of your interests, for example, based on simulations you perform on our website.
- We also analyse the results of our marketing activities to measure the relevance and effectiveness of our campaigns.
- Measure the effectiveness and reach of targeted ads from Helan Health Insurance (ad measurement).
- Cap the frequency that Helan's advertisements are displayed to visitors of websites of Helan Health Insurance across domains (frequency capping).

3.2. Creating customer profiles

Helan Health Insurance can also load existing customer lists into Facebook and the Google AdSense account, to match its campaigns to the right profiles more effectively. This data is anonymised, also known as 'hashing'. Hashing is a cryptographic security method that encrypts your data, e.g. an e-mail address, in random codes that cannot be reversed. As such, this data can no longer be traced back to an individual.

- **Google AdSense**
The private data of our clients is loaded as plain text, and hashed in the file (email address) on our computers using the SHA256 algorithm. It is then securely transmitted to Google's servers. More information: <https://support.google.com/google-ads/answer/6276125?hl=en-GB&sjid=7569822306798446299-EU>
- **Facebook ads**
The uploaded list only uses the customer's email address to find matches. The information in the customer list is hashed so that it cannot be traced back to an individual. More information: <https://en-gb.facebook.com/business/help/170456843145568?id=2469097953376494>

3.3. Optimising our communications

- Sending newsletters with personalised health advice, changes to legislation, etc.
- We use data about your transactions to better understand the use of our services so that we can improve them. For example, when you sign up, we track whether you also use our online services such as the App and MyHelan.

3.4. Prospecting new customers:

Helan may collect data on persons who are not yet customers of Helan through various channels, such as competitions, online promotional campaigns (e.g. online banners, affiliate mailings, Google ads, native ads, Facebook ads, etc.), events, trade fairs and purchase of data from specialist companies, with the intention of providing these individuals with the most relevant products and services from Helan's offering. Where necessary, we will contractually require third parties, who collect your personal data on our behalf, to collect your consent. Helan tracks its prospecting in CRM Microsoft Dynamics.

3.5. Improving our services

Helan can use Hello Customer and Checkmarket to send surveys to customers to gauge satisfaction with our services, for example. Helan uses this information to improve our services.

4. Which data is processed?

In the context of its various marketing activities, Helan may process the following personal data: personal identification data (names, address, telephone number, etc.), electronic identification data, (IP address, cookies, login times), hobbies and interests, consumption habits, personal characteristics (age, gender, status), lifestyle habits, family composition, affiliations (with health insurance companies).

Helan may also become aware of the following personal information:

- **National register data:** national register number and identification data (name, first names, date and place of birth, sex, nationality, principal place of residence, date and place of death, status, family composition, legal cohabitation, type of registration register)

The systems that enable us to analyse our pages on the website, etc., may record the following data:

- IP address of the device (accessed and stored in anonymised format), device ID, user ID, device screen resolution, screen width, device type (device identifiers), time of visit, any repeat visits, operating system and browser type (client identifiers), geographic location, preferred language, mouse actions (movements, location and clicks), keystrokes, referring URL and domain, clicks on events, behavioural data such as pages visited, preferred language used to display the web page, and date and time when the web pages were accessed.
- Reporting on what types of people are viewing our ads, how the ads are performing etc., but no information is shared that could identify you personally (such as your name or email address) unless you have given Facebook permission to do so. However, as advertisers, we do have access to demographic information and information about interests, to gain more insight into the target audience.
<https://www.facebook.com/privacy/explanation>

5. What are our sources of information?

Your data primarily comes from:

- You, your legal representative or anyone you have authorised
- Healthcare providers in the context of handling complaints
- Service providers in a direct contractual relationship with Helan Health Insurance, Helan Domestic Help, Helan Child Care, Helan Medical Supplies Store
- Specialist marketing companies: Google Analytics, Google Optimize, Clarity, Hotjar, Tryinteract, Google Doubleclick, Facebook, DPG media, Google Adsense, TradeDoubler, Online Activity, Outbrain, Flexmail, Active Campaign, Manufast (letters, postcards), Checkmarket and Hello Customer for surveys
- Our systems: website (Magnolia), forms on website, online tools such as the appointment module where you enter your own data
- Script manager for forwarding our forms to CRM Microsoft Dynamics
- CRM Microsoft Dynamics for following up leads
- Tableau for reporting results from CRM Microsoft Dynamics

6. Security and confidentiality

Only authorised persons have access to personal data that is relevant to the performance of their tasks. These persons can only use the data if and insofar as necessary for the performance of their tasks. They are bound by strict professional confidentiality and by all technical requirements necessary to safeguard the confidentiality of personal data and the security of the systems in which it is held.

Helan takes internal technical and organisational measures to prevent (personal) data from falling into the hands of unauthorised persons or being processed by them, or from being accidentally altered or destroyed. Our premises, servers, network, transfers and data are secured in accordance with internal rules.

7. With whom can your data be shared?

We handle your data with extreme care and only share the information necessary, to provide you with the best service.

Your personal data may be shared with:

- your and/or your legal representatives (including provisional administrators) or with your representative (professional advisor, lawyer, mediator, etc.) who has been authorised at your request, either directly or through a healthcare professional of your choice.
- other entities of the Helan Group: Helan Onafhankelijk ziekenfonds (Health Insurance), Helan Huishoudhulp (Domestic Help), Helan Kinderopvang (Child Care), Helan Gezinszorg (Family Care), Helan Zorgwinkel (Medical Supplies Store)
- our VMOB (mutual assistance insurance company) 'MLOZ Insurance'
- our auditor and our external auditors, all of whom are bound by an obligation of confidentiality
- our lawyers and the judiciary, in the event of disputes
- judicial or investigative bodies, such as the police, prosecutors, courts, arbitration or mediation bodies at their express request
- any institution that may grant you a benefit if you enjoy privileged status (see section on 'Profiling')
- a duly authorised third party (by law, contract, consent, agreement)
- your creditors in enforcement proceedings
- our subcontractors

8. Who are our subcontractors?

Helan relies on the following subcontractors to ensure you receive the best possible service:

- IT service providers such as MLOZ IT
- Service providers with whom a cooperation agreement and processor agreement has been concluded, such as Duke&Grace, Cronos (Magnolia), Active Campaign, SalesManago, etc.
- our lawyers and court bailiffs
- Manufast or bpost and DPXS, for sending and transporting our documents and letters
- Hello Customer and Checkmarket for satisfaction surveys

You can request a complete list of subcontractors at privacy@helan.be.

In the above cases, we ensure that the third parties only have access to the personal data they need to perform their specific tasks. We also ensure that these third parties undertake to use the data securely and confidentially, and in accordance with our guidelines.

We do not sell your personal data to third parties under any circumstances.

9. Will your data be transferred to countries outside the EEA?

No, only if you have expressly agreed to this.

10. How long will your data be kept?

We strive to keep your personal data no longer than necessary for the purposes for which it was collected.

Your identification data as a member of Helan will be kept once you are signed up with Helan. There is no general retention period; it varies depending on the circumstances. In general, your data will be kept for 3 to 30 years, according to the relevant guidelines and legislation and in accordance with the legal basis referred to above.

We may also retain your personal information as evidence in any legal proceedings. In such cases, the personal data will not be actively used.

For example, we keep your personal data as a potential customer for up to 3 years.

11. What are your privacy rights?

When your personal data is subject to processing, you can exercise various rights.

11.1. Right of access

You have the right to ask Helan at any time whether we are processing your personal data and, if so, to access that data and receive additional information about:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients (in particular, recipients in third countries);
- if possible, the retention period or, if that is not possible, the criteria for determining that period;
- the existence of your privacy rights;
- the right to lodge a complaint with the supervisory authority;
- the information we have about the source of the data if we obtain personal data from a third party; and
- whether there is automated decision-making. You can access certain data directly yourself via MyHelan.

You also have the right to receive a free copy of the processed data, in an easy-to-understand form.

If you exercise your right to access your data, Helan will provide you with as complete an overview of your data as possible. It is possible that some personal data from conventional backup files, log files, history files or archive files may not be included in this overview. This data is not part of the routinely processed personal data and is therefore not immediately available. As such, it cannot therefore be provided. It is removed from these files in accordance with standard clean-up processes.

According to legal provisions, we cannot directly communicate your medical information to you. To obtain this information, please contact your GP.

11.2. Right to rectification of personal data

You have the right to have incomplete, incorrect, inappropriate or outdated personal data rectified immediately.

In order to keep your data up to date, we kindly request that you notify us of any changes, such as a change of address, change of email address or telephone number.

You can correct certain data directly yourself via MyHelan.

11.3. Right to erasure (the 'right to be forgotten')

You have the right to have your personal data deleted without undue delay if you suspect that Helan is processing certain data unlawfully.

Please bear in mind that we may not always be able to delete all requested personal data, for example when processing it is required under a legal obligation to which we are subject.

11.4. Right to object to certain uses of data

You have the right to object to the processing of your personal data on grounds relating to your specific situation if the processing is performed in the legitimate interests of Helan or in the public interest. Helan will cease the processing of your personal data unless Helan can demonstrate compelling and legitimate grounds (e.g. in the context of the fight against fraud) for the processing that override your interests or when the processing of the personal data is related to the establishment, exercise or defence of legal claims (e.g. bringing a petition to a court).

11.5. Right to object to automatic processing

Some data processing and processes are fully automated, without human intervention, for example when an increased allowance is granted for medical care.

If you disagree with the outcome of this fully automated process, you can contact Helan and let us know why you dispute the assessment.

11.6. Right to transfer your data to a third party

You have the right to request that personal data you have provided to Helan be transferred to you or directly to a third party. In the case of a transfer of data between health insurance funds, they will take care of this among themselves via the mutation procedure.

However, the privacy legislation imposes a number of restrictions on this right, which means that it does not apply to all data.

12. How do you exercise your privacy rights in practice?

12.1. Right to rectification of your data

Via the usual channels: agency, website, MyHelan.

12.2. Right to access, erasure, objection (including automated decision-making)

Via the contact form available in your MyHelan account (only for data subjects who have an active MyHelan account), our website or Helan offices.

In order to exercise your right of access and to prevent any unauthorised disclosure of your personal data, we need to verify your identity. A copy of the front and reverse side of your identity card will be requested.

12.3. You have a question or complaint

You can contact the Data Protection Officer (DPO) in several ways:

- via the web form <https://www.helan.be/nl/contacteer-ons/meldpunt/gdpr/>
- the contact form in MyHelan (as described above)
- via e-mail: privacy@helan.be
- by letter: Helan, F.A.O. Data Protection Officer, Gistelsesteenweg 294, 8200 Bruges.

Would you like more information, or do you disagree with Helan's position? Then definitely visit the site of the Belgian Data Protection Authority, www.dataprotectionauthority.be. You can also lodge a complaint there.

12.4. In what format and when will you receive a reply?

When you submit your request electronically, the information will be provided electronically where possible, unless you request otherwise. In any case, we will provide you with a concise, transparent, understandable and easily accessible response.

If you exercise your right to access your data, it will be provided via your MyHelan account or handed over to you in person at your Helan office.

We will respond to your request as soon as possible, and in any case within one month of receiving it. Depending on the complexity of the requests and the amount of requests, this period may be extended by a further two months if necessary. If the time frame is extended, we will notify you within one month of receiving the request.

13. Are you subject to automated decisions?

In the context of the various operational activities mentioned above, you are not the subject of any automated decision.

14. Changes

Helan may amend this privacy policy from time to time, for example in the context of new processing activities which it undertakes. We therefore invite you to always consult the latest version of this policy on our website. We will of course inform you in advance via our website or other current communication channels of any content-related changes and, where required by law, we will request your prior consent for our (new) processing activities.

In the event of any discrepancy, our general terms and conditions and the special terms and conditions applicable to specific Helan products and services shall take precedence over this privacy policy.