

Privacy & Cookie Policy

Last updated: 16 April 2019

1. Who are we?

The campaign “SORRY IS EEN BEGIN” (the “Campaign”) is hosted by Creative Club of Belgium vzw/asbl, (Hereinafter “**Creative Belgium**”), a Belgian company, registered in Belgium under number 0423.445.976. Contact and other relevant details are set out at the end of this policy in the “[Creative Belgium Details](#)” section.

Happiness Brussels BVBA (hereinafter “**Happiness Brussels**”, “we”, “us”, “our”), a Belgian company, registered with the Crossroads Bank of Enterprises under number 0876.054.114, is the developer of the idea and **data controller & processor** in relation to any personal data collected. Contact and other relevant details are set out at the end of this policy in the “[Happiness Brussels Details](#)” section.

2. What will you find in this policy?

We gather information about the users of www.sorryiseenbegin.be and www.pardonestundebut.be (the “Website”), which is part of the campaign “Sorry is een begin” (hereafter “the Campaign”), and act as data controller in relation to the personal data we collect and further process. You will find herein all the relevant information on

- [what kind of information we collect,](#)
- [how that information is collected and used by us,](#)
- [what your rights are in relation thereto.](#)

3. What kind of information do we collect?

3.1. Information provided by you

We collect the information you provide us with:

Category 1

When filling in and sending us the participation form which is accessed through the “IK DOE MEE” button on the Website homepage (the “Participation Form”):

- your first and last name;
- your e-mail address;
- your employment status;
- your work function and/or area of study;
- your phone number;
- your written letter.

For your written letter uploaded to the Website as part of your participation, our Rules of Contest are applicable which can be found [here](#).

Category 2

When subscribing to our newsletter, the following information will be collected:

- your first name;
- your last name;
- your e-mail address.

Category 3

When voting on the contest:

- your e-mail address.

3.2. Information collected through cookies

The Website also uses cookies or similar technology to collect information about your access to the Website, including users and sessions, behavior, language and location, equipment, network information, app marketplace information, crash information, app speed, anonymized IP address, etc.

You can find all the information in relation thereto under the section below on [our use of Cookies](#).

4. How do we use that information and for what purpose?

4.1. Information provided by you

We use the information provided through the Participation Form, **based on your consent**, for the following purposes:

Category 1

- to contact you by email and / or telephone in relation to the contest;
- to keep you up to date by email and / or telephone about the contest and the campaign;
- [Optional] If the user has opt in for the masterclass copywriting: to share the data provided in the Participation Form to [ACC Belgium](#), who will organize the masterclass copywriting.
- [Optional] If the user has opt in to share his/her personal data with agencies: to share the data provided in the Participation Form to [ACC Belgium](#) and third party agencies who are interested in potential copywriters.

Category 2

- to keep you up to date by email about the Campaign;

Category 3

- to keep you up to date by email on the outcome of the contest and as part of the voting process (checking of singular votes).

We will not make any further use of your data without having informed you thereof, and where required, without having obtained your prior consent.

You can withdraw your consent at any time. For that, all you need to do is follow the instructions set out in the section below relating to [your Rights](#).

Once you send the Participation Form for the contest, the subscription to the newsletter or your registration of your vote, your information will be:

- stored on a content management system secured by a password,
- accessed only if it is strictly necessary for the purpose outlined above, by:
 - any member of the staff of Creative Belgium or Happiness Brussels on a need to know basis;
 - our service providers which in the context of the performance of their services are involved in the processing of your information, including our website developer Bliss Interactive, our hosting server Amazon (hosted in Frankfurt), and Google Analytics;
 - the members of the jury that are assigned to evaluate the contest that is part of the Campaign.
- retained no longer than necessary for the purpose outlined above. Thereafter, the information relating to you will be deleted from our content management system.

4.2. Information collected through cookies

We use the information collected through cookies only to distinguish you from other users of our services. This helps us to provide you with a good experience when you browse our Website, and allows us to improve our Website.

We use cookies to, among other things, enable you to use certain Website features, recognize you when you return to our Website and monitor and maintain information about your general Internet usage and use of our Website. Cookies help us to improve our Website and to deliver a better and more customized service. They allow us to customize our Website according to your individual interests. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Website. You will find hereunder the instructions to follow to [disable cookies](#).

5. What cookies do we use, and how do we use them?

5.1. What are cookies and how do they work?

A cookie is a small text file that can be stored on your computer when you visit websites. Information is saved in this text file, such as your choice of language on a website. When you visit the website later again, this cookie returns to the concerned website. In this way, the website recognizes your browser and can for example retain your choice of language.

Cookies usually also have an expiration date. For example, some cookies are automatically deleted when you close your browser (so-called session cookies), while others can be stored longer on your computer, sometimes until you delete them manually (so-called permanent cookies).

5.2. How do we use cookies?

We use only analytical/performance cookies on www.sorryiseenbegin.be and www.pardonestundebut.be: these cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate purposes to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Our Website also includes third party technical functions in order to improve the service, including Youtube video players and Google Analytics. These functions can use anonymized cookies, or other cookies (DoubleClick for example) only when they are activated.

Google Analytics

This analytical tool installs cookies that we use in order to quantify the visits (traffic) on the website and the behavior of the users on our Website. This allows us to know how many times a particular page has been consulted, a video has been viewed or help has been asked for. We use this information only to improve the content of the Website or as a basis for a new campaign by determining certain topics of great interest. You can find more information in the [Google Analytics tool](#).

To provide website visitors more choice on how their data is collected by Google Analytics, Google has developed an Opt-out Browser add-on, which is available by visiting [Google Analytics Opt-out Browser Add-on](#), to enable you to opt- out of Google's programs.

Youtube video player

Our Youtube videos have privacy-enhanced mode enabled: therefore YouTube won't store information about you, unless you play the video, according to the [Google-Youtube guide](#).

5.3. Which cookies do we use?

We use the following cookies:

Name	Description	Type	Duration
NID	This cookie is set by ReCAPTCHA (which is owned by Google) for the purpose of distinguishing humans from spam bots.	Third party	6 months
cookie-policy-accepted	Save GDPR consent pop-up selection to improve user experience	Persistent	1 year
_ga	Distinguish unique users by assigning a randomly generated number as a client identifier.	Persistent	2 years

_gat	Throttle the request rate - limiting the collection of data on high traffic sites.	Persistent	10 minutes
_gid	Store and update a unique value for each page visited.	Persistent	24 hours

5.4. How to manage cookies in your browser?

The consequences of disabling cookies depend on which cookies you disable, but in general, the Website may not operate properly if you take this decision. Below you will find details on how to use common types of browser to disable cookies.

Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. You can easily delete and manage any cookies that have been installed in the cookie folder of your browser by following the instructions provided by your particular browser manufacturer.

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

[Safari \(Desktop\)](#)

If your browser is not listed here, consult the documentation that your particular browser manufacturer provides. You may also consult your mobile device documentation for information on how to disable cookies on your mobile device. If you disable all cookies, you may not be able to take advantage of all the features of our Website.

6. What are your rights?

Pursuant to the Belgian Act of 30 July 2018 on the protection of privacy as regards processing of personal data and the General Data Protection Regulation (“**GDPR**”), you have the right:

- to request
 - access to your personal data at any time,
 - that inaccurate, outdated, or no longer necessary information be corrected, erased, or restricted,
 - in certain circumstances, the erasure of your data, especially if the personal data concerned have been collected directly from you and that those personal data are no longer necessary for the purpose for which we collected it, the processing of the personal data concerned was based on your prior consent and you have withdrawn such consent or if you object to the processing of the personal data.
- if the processing is based on your consent, to withdraw your consent at any time.

- to object to the processing of your data at any time on condition that your objection is justified on your own grounds, and such justification is within the limits of applicable data protection regulations.
- if you object to the processing of his or her personal data, or if he or she challenges the legality of the processing of his or her personal data or the accuracy of his or her personal data, to request that **Happiness Brussels** restricts the processing of his or her personal data for the time necessary for **Happiness Brussels** to verify the basis of such request. Such restriction may also be requested if the processing of your personal data is considered illegal but the User does not want his or her personal data to be deleted.

You can exercise these rights by sending an e-mail to privacy@happiness-brussels.com or sending a letter to Happiness Brussels BVBA, 1800 Vilvoorde, Steenkaai 42, Belgium.

7. Security

We are committed to protecting your information. Any personal information you provide to us is maintained on a secured content management system. We take all appropriate security measures to protect your information against unauthorized access to or unauthorized alteration, disclosure or destruction of data.

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved.

8. Links to third party website

This website may also link or direct you to other websites or external content which are not within our control. Links to other websites may be provided for your convenience and information. Creative Belgium and Happiness Brussels are not responsible for the external content, nor does it reflect any (political) opinion.

We will not be responsible for the protection and privacy of any personal data which you provide on those websites. These sites have their own privacy policy in place, and we recommend you to review these if you visit any linked website.

You should therefore exercise caution including reviewing the privacy policy of those websites before disclosing any personal data.

9. Creative Belgium Details

Creative Belgium. Creative Club of Belgium vzw/asbl, registered in Belgium under company number 0423.445.976, with registered address Schaarbeeklei 636, 1800 Vilvoorde, Belgium. VAT number is BE0423.445.976.

For any questions regarding the Campaign: info@happiness-brussels.com

10. Happiness Brussels Details

Happiness Brussels BVBA, established at 1800 Vilvoorde, Steenkaai 42 and registered with the crossroads bank of enterprises (CBE) under number 0876.054.114, with VAT number BE0876.054.114

For any questions about your personal data: privacy@happiness-brussels.com

Please review the [Last Updated](#) legend at the top of this page to determine when this policy was last amended. Any changes to this this policy will become effective on the Last Updated date indicated above. By using the Website or providing information to us following such changes, you will have accepted the amended policy.

11. Questions

If you have any questions regarding this policy or our use of cookies, please contact us by email at privacy@happiness-brussels.com.