

VISITFLANDERS PRIVACY POLICY

AIM OF THIS PRIVACY POLICY

With this privacy policy, VISITFLANDERS wants to inform you about the processing of your personal data in the context of the YouFlanders app. We attach the utmost importance to your privacy and handle your personal data with great care. We also comply with the requirements set out in privacy legislation, in particular, the General Data Protection Regulation (GDPR) and other laws and regulations derived therefrom.

VISITFLANDERS would like to emphasise that the processing of personal data resulting from the use of this app is only ever carried out with your consent. You, the user, are free to decide whether to install and use the app, share your location, or express an interest in a certain location/tourist attraction. You can stop using the app at any time, choose not to start a new session (which means your location will no longer be shared), or delete the app. Via the settings on your device, you can indicate that you want to stop sharing your location and therefore withdraw your consent. When you use the app, VISITFLANDERS assumes that you agree to the (initial) processing of your personal data and understand that your location will be tracked when you use the app (if you give your explicit consent for this).

This privacy policy is published by the Flemish agency VISITFLANDERS as the data controller, having its registered office at 1000 Brussels – Grasmarkt 61, and enterprise number BE0225.944.375.

If you have any questions or comments about this privacy policy or about the protection of personal data by VISITFLANDERS, you can contact us via the channels listed at the bottom of this privacy policy.

THE YOUFLANDERS APP

The YouFlanders app is a mobile application that shows you an overview of the tourist attractions in Flanders. In your area or at your destination, you'll not only see all the great places to visit, but also how busy they are. During the COVID-19 pandemic, this is very useful information. By collaborating with the owners of businesses in the tourism sector (e.g. museums, hotels, parks etc.) and with you, the user, VISITFLANDERS want to inform users about how busy it is at tourist attractions. We hope that this will help to prevent overcrowding at tourist attractions and will distribute the visitor flows (by providing information and advice).

The YouFlanders app offers you three ways to find out how busy it is at a tourist attraction. The first way is to zoom into a tourist attraction on the map. An indicator shows whether it is currently busy at that location. Another option is to search for a specific tourist attraction to see whether it is currently too busy. Finally, the third option is to open the app when you leave your house and allow the app to track your location. When you are in the vicinity of a tourist attraction, the app will send you a push notification to inform you of how busy it is at the location. Since the third option requires the app to track your location, we believe it is important to provide you with sufficient information regarding this in this privacy policy.

WHAT PERSONAL DATA DO WE PROCESS?

In the context of the YouFlanders app, various personal data from you, the user (tourist), is processed. It concerns the locations in which you express an interest, the unique identifier (your IP address), which is used to allow the app and the internet to communicate, and the keys that are generated to secure this communication. Finally, the app also gives you the option to communicate with VISITFLANDERS and provide suggestions via a form. This means your name, email address and the message itself will be processed as personal data. Need more info? We explain everything in more detail below.

First and foremost, the app will temporarily register which location/tourist attraction you are interested in. This is to determine whether it is currently busy at that location. Via communication on the internet, the app will communicate with an underlying platform. This is carried out using the IP address, which is unique to your device when it is connected to the internet. This information will be stored until the app gives you a response (option 2) or until you stop using the app (option 3). Finally, this communication is also secured using encryption and therefore the encryption keys that are used for this must also be considered personal data. The personal data that is processed is provided by you or is automatically created when you install or use the app and is then deleted afterwards (see below).

Option 1: you use the app to zoom in to a specific tourist attraction and see how busy it is

When you use the app to zoom into the map, there will be no registration or communication that requires the processing of personal data.

Option 2: you use the app to search for a specific location

When you use the app to search for a specific tourist attraction, only the location (the tourist attraction you are interested in) and the information required for the communication will be processed. Your current location or the route you take will never be registered or communicated.

Option 3: you use the app when you leave your house and allow the app to track your location and then send notifications based on your location

When you allow the app to track your location when using the app (e.g. when you leave your house and arrive at a public park), it will follow your current location. When you are near a tourist attraction, it will therefore find out whether this location is currently busy or in demand, and will provide you with a response/advice.

WHY DO WE PROCESS YOUR PERSONAL DATA?

THE AFOREMENTIONED PERSONAL DATA WILL BE PROCESSED BY VISITFLANDERS TO:

- Inform you about how busy a specific location/tourist attraction is
- Carry out measurements, analysis and reporting (via aggregated data) regarding the general interest in certain locations/tourist attractions
- Make it possible to communicate with you

On the basis of these purposes, the information (after the app is installed) must be stored and processed. In addition, for options 2 and 3, communication between the app and its underlying environment will occur, as well as an analysis of the information.

All processing takes place with your consent. You, the user, are free to decide whether to install and use the app and/or enable location sharing when using the app. Instead of sharing your location, you have the alternative (option 1 and 2) of providing a location on your own initiative, or zooming in and receiving advice on this location. Since you are taking the initiative in every instance, the processing of the aforementioned personal data is always carried out with your consent.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

To offer and manage the YouFlanders app, VISITFLANDERS works with external service providers. They are commissioned and instructed by VISITFLANDERS to provide the app and are not only managed by VISITFLANDERS, but also themselves. As a result of this, these external service providers (technically speaking) have access to your personal data for the duration of the storage period. The external service providers are:

- Microsoft Corporation (hosts the app)
- Arxus NV (maintains the app)
- Studio Hyperdrive NV (develops and maintains the app)

VISITFLANDERS has concluded an agreement with each of these parties to ensure that they process personal data only in accordance with the instructions from VISITFLANDERS and therefore maintain the same level of security and confidentiality as VISITFLANDERS. VISITFLANDERS remains responsible for this processing by third parties.

HOW LONG DO WE STORE YOUR DATA?

We store your data no longer than is strictly necessary to achieve the purposes for which the data is collected (see above). The personal data is made anonymous as quickly as possible by unlinking your current location (option 3) and your IP address (option 2 and 3) from the tourist attraction in which you are interested. Only the location in which you have expressed an interest will be stored as aggregated data for further measurements, analysis and reporting purposes.

In addition, we will delete your data (where possible¹) without unnecessary delay if you ask us to (see below).

More specifically, these are the storage periods that are used and the criteria applied in the context of the storage:

Personal data	Storage period	Explanation
Location you are interested in ('tourist attraction')	Until advice has been communicated to you, the user	The location you are interested in as a user ('tourist attraction') is stored until you have received a response/advice. After this communication, the location you have expressed an interest in ('tourist attraction') will be unlinked

¹ Due to the speed of the interaction, it is highly likely that the personal data will already have been deleted before the request can be fulfilled.

		from your unique identification and stored separately.
Current location (option 3)	Until the current session on the app has ended	Your current location is only tracked when you use the app and give your consent (option 3). When you close the app, the app stops tracking your location.
IP address	Until advice has been communicated to you, the user	Your IP address is linked to your device and is used to enable communication with the underlying platform. Your IP address is stored until you have received a response/advice. After this communication, your IP address will be unlinked from the location in which you have expressed an interest ('tourist attraction').
Encryption keys	Until advice has been communicated to you, the user	The encryption keys are used to enable secure communication with the underlying platform. When no communication is made, the encryption key will also not be stored.
E-mail address	Until one year after your question has been answered	Your email address will be stored for a maximum of one year after your question has been answered (if you ask a question).
Name	Until one year after your question has been answered	Your name will be stored for a maximum of one year after your question has been answered (if you ask a question).

WITHDRAWING YOUR CONSENT AND OTHER RIGHTS WITH REGARD TO YOUR PERSONAL DATA

With regard to personal data, you always have the right to:

- (1) Withdraw your consent for the processing of your personal data. You can do this by withdrawing your consent for the app to track your location (option 3) or by no longer using/deleting the app.
- (2) Submit a request for access to your personal data.
- (3) Submit a request for rectification of your personal data.
- (4) Submit a request to limit the processing of your personal data.
- (5) Submit a request for the complete removal of your personal data.
- (6) Submit a request for data portability. This means that you request to transfer your data to yourself or to another organisation when this is required by law.

(7) Submit a complaint regarding the processing of your personal data.

VISITFLANDERS would like to inform you that the YouFlanders app has been designed according to the principle of privacy by design and privacy by default. This means that the relevant personal data is deleted as quickly as possible (see above) and a request for deletion will possibly be too late, as the personal data will potentially already have been deleted.

All requests to exercise the rights set out above can be submitted via the channels listed at the end of this privacy policy. If you are unable to reach an amicable solution with us, you also have the right to file a complaint with the Belgian Data Protection Authority (formerly known as the 'Privacy Commission'). You can find their contact details here: <https://www.dataprotectionauthority.be/contact-us>.

SECURING YOUR PERSONAL DATA

VISITFLANDERS does its utmost to ensure that misuse, loss, unauthorised access and other undesirable actions involving your personal data are prevented. We implement the appropriate technical and organisational measures in order to ensure that the processing satisfies the requirements of national and European legislation and, in this way, we guarantee the protection of your rights. Our Data Protection Officer ensures that these measures are regularly monitored and modified where necessary.

The YouFlanders app was developed with privacy and information security in mind, is hosted in a secure environment and is well managed to prevent incidents. The app also underwent extensive testing (functional and in relation to security). In addition, access is limited to a few strictly necessary persons and the communication the app has with the underlying platform is secured with encryption. Other (indirect) measures that were applied will not be specifically listed or explained in this privacy policy.

CHANGES TO THE PRIVACY POLICY

We may change this privacy policy from time to time. All updates and changes come into effect immediately following their publication. We therefore encourage users to consult this privacy policy on a regular basis, so you stay informed of changes that may influence you. Important changes will always be brought to your attention by VISITFLANDERS (via the app or other communication channels). If necessary, we will ask you to agree to the privacy provisions of this app again.

If we are planning on processing personal data for other purposes than the purposes for which the personal data was obtained, we will inform you about this via appropriate communication channels (including this app) before the processing occurs.

Date of version: 08/06/2020

CONTACT DETAILS OF VISITFLANDERS AND THE DATA PROTECTION OFFICER

Contact details of the controller for the processing of personal data

VISITFLANDERS

Registered office: Grasmarkt 61, 1000 Brussels

+32 2 504 03 00

communicatie@toerismevlaanderen.be

Contact details of the Data Protection Officer

VISITFLANDERS (attn. the Data Protection Officer)

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privacy@toerismevlaanderen.be