

**Data Privacy Statement**  
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I. Introduction

Sibelga attaches great importance to protecting the personal data of users of the Brussels gas and electricity distribution networks.

Sibelga is your gas and electricity distribution network operator in the Brussels-Capital Region. Its public interest missions are mainly governed by the electricity ordinance, the gas ordinance, the electricity technical regulation and the gas technical regulation.

In accordance with the electricity and gas ordinances, Sibelga has entrusted the daily operation of its activities to the operator Brussels Network Operations (BNO) s.c.r.l., which it controls and with which it has concluded a contract concerning the joint obligations regarding personal data. BNO staff therefore carry out the day-to-day operation of Sibelga's business so that the processing of personal data for Sibelga is carried out by BNO employees.

This policy only concerns the processing of Sibelga personal data in the performance of its missions in the public interest. This policy does not concern the processing of personal data by BNO for the management of its staff and the management of applications for employment.

This Data Protection Policy has been adopted by the Sibelga Board of Directors on 11 June 2019. In accordance with Chapter III of the General Data Protection Regulation, this policy is intended to inform data subjects about the processing of personal data by Sibelga.

## II. Identity of the data controller and contact details

Sibelga, an intermunicipal organisation, has been appointed manager of the electricity and gas distribution networks in the Brussels-Capital Region via the two following decrees:

- Order of the Government of the Brussels-Capital Region of 2 July 2015 designating the cooperative company with limited liability Sibelga as manager of the electricity distribution network in the Brussels-Capital Region for a period of twenty years (*Moniteur Belge* 31 July 2015);
- Order of the Government of the Brussels-Capital Region of 2 July 2015 designating the cooperative company with limited liability Sibelga as manager of the gas distribution network in the Brussels-Capital Region for a period of twenty years (*Moniteur Belge* 31 July 2015).

A detailed presentation of the Sibelga group is available on Sibelga's website ([www.sibelga.be/fr/sibelga-group](http://www.sibelga.be/fr/sibelga-group)).

Under the electricity and gas ordinances and in accordance with the gas and electricity technical regulations, Sibelga is the controller:

Sibelga SCRL,  
quai des Usines, 16  
1000 Brussels  
Crossroads Bank of Enterprises No. 0222-869-673  
[www.sibelga.be](http://www.sibelga.be)  
[dpo@sibelga.be](mailto:dpo@sibelga.be)

Since Sibelga has entrusted BNO, its subsidiary, with the day-to-day operation of its business, and having regard to the contract concerning the obligations of joint data processing officers concluded on 16 January 2018, BNO and Sibelga are jointly and severally responsible for the processing of personal data within the meaning of Article 26 of the General Data Protection Regulation.

BNO contact details are:

Brussels Network Operations S.C.R.L.,  
quai des Usines, 16  
1000 Brussels  
Crossroads Bank for Enterprises No. 0881-278-355  
[www.sibelga.be](http://www.sibelga.be)  
[dpo@sibelga.be](mailto:dpo@sibelga.be)

Notwithstanding the foregoing, this policy will designate "Sibelga" as controller.

Sibelga and BNO are two public authorities, within the meaning of the General Data Protection Regulation and the law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (*Moniteur Belge* 05 September 2018).

### III. Personal data that can be processed

As part of its public interest missions, Sibelga is required to process the following personal data:

- Identifying information;
- Contact details;
- Email address;
- Home telephone, mobile and fax numbers;
- Place and date of birth;
- Civil status and legal cohabitation;
- Gender;
- Language preference;
- Copy of their ID card;
- Copy of their driving licence;
- Household composition;
- Income;
- Vehicle registration numbers;
- Images taken by surveillance cameras;
- Photos/film recorded on the occasion of certain events;
- Recordings of telephone calls;
- National registration number (see deliberation no. 74/2009 of 23 December 2009 of the Sectoral Committee of the National Register of the Privacy Commission);
- Any company data, such as business and/or VAT number;
- Technical data in the context of network management;
- Metering data required for billing;
- Data relating to access to the network (change of supplier, house move, presence of a power limiter, etc.);
- Social data, including being considered a protected client;
- EAN code, kept by Sibelga as a unique identification key;
- The presence of an electricity generating facility, an electric vehicle and certain of their technical characteristics;
- Other personal data obtained by Sibelga from third parties, for example the Crossroads Bank for Social Security or the Land Registry;
- Financial data (account number);

Not all the data listed above is processed for each data subject. The personal data collected depends on the category of the data subject (if they are a site visitor, network user, etc. (see below)).

This personal data is processed from:

- Information about the data subject exchanged by the energy supplier for the proper performance of the supply contract and the performance of the public tasks assigned to Sibelga;
- directly by Sibelga to the data subject in connection with a request for services or work, a complaint or a question asked;
- from third-party public bodies.

This data relates to the following individuals:

- distribution network users as defined by the Electricity and Gas Ordinances;
- property owners connected to the Sibelga distribution network;
- contacts with contractors/subcontractors and potential contractors/subcontractors;

- holders of real or personal rights related to Sibelga;
- visitors to Sibelga's site or representative office;
- persons who have lodged a complaint or a request for information;
- public representatives, in particular municipal representatives of the 19 municipalities of the Brussels-Capital Region;
- members of the general meetings and governing bodies of Sibelga.

#### IV. Lawfulness of processing

Under the General Data Protection Regulation (EU 2016/679), the processing of personal data is lawful only if, and to the extent that, at least one of the following conditions is fulfilled:

- a) the data subject has given consent to the processing of their personal data for one or more specific purposes;
- b) the processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) the processing is necessary to protect the vital interests of the data subject or of another person;
- e) processing is necessary for the fulfilment of a mission in the public interest or falling within the remit of the public authority in which the controller is included.

Sibelga mainly processes personal data for:

- performing missions in the public interest enshrined in the following regulations:
  - o Ordinance of 19 July 2001 on the organisation of the electricity market in the Brussels-Capital Region;
  - o Ordinance of 1 April 2004 on the organisation of the gas market in the Brussels-Capital Region, concerning road fees for gas and electricity and amending the Ordinance of 19 July 2001 on the organisation of the electricity market in the Brussels-Capital Region;
  - o Technical regulation for gas;
  - o Technical regulation for electricity.
- perform the supply agreement that the data subject has concluded with his or her energy supplier, for the purpose of billing for the energy consumed and the access services provided for in the supply contract or in the applicable legislation;
- comply with the legal obligations to which Sibelga is subject, in particular with regard to combating vacant housing and combating fictitious addresses, and with regard to the communication of information to the public authorities legally entitled to require the communication of information
- if necessary and to a limited extent, ensure the security of its site where there is a legitimate interest (cameras).

Apart from the cases specified above, Sibelga only processes personal data with the consent of the data subject and, in this case, in accordance with the requirements of the General Data Protection Regulation. This is particularly the case when actors such as energy service providers request access to personal data.

V. Purposes of processing

The purposes of Sibelga's processing of personal data are as follows:

- Compliance with its legal obligations and performance of its missions in the public interest:
  - o Management of gas and electricity distribution networks;
  - o Installation and provision of connections;
  - o Network management and management of gas and electricity flows;
  - o Provision and management of access to its networks, including the voltage characteristics, gas pressure and the quality of the gas supplied to the access point;
  - o Installation, maintenance and reading of meters and the processing of metering data, including the validation of this data;
  - o Management of access to metering data and meter management related to green electricity generation facilities;
  - o Flexibility data management;
  - o Management of breakdowns and troubleshooting;
  - o Management of surveillance cameras to:
    - protect the company's assets;
    - monitor its sites;
  - o Manage data for public lighting;
  - o Communicate to network users the information they need for effective access to said network, including the use thereof; this communication can take the form of sending letters or e-mails, distribution from any mailboxes, etc. This communication of information may in particular concern awareness-raising of aspects related to the use of electricity or gas. In any case, the communication of information serves no commercial purpose.
- Performance of legal and regulatory obligations. In particular:
  - o obligations to communicate with the regional service responsible for the monitoring of vacant dwellings in the Brussels-Capital Region (Article 15 of the Brussels Housing Code);
  - o the obligation to communicate certain consumption data to the Crossroads Bank for Social Security pursuant to Article 101 of the Framework Act (I) of 29 March 2012;
  - o the data reporting obligations to BRUGEL and Brussels Environment as part of the information exchange organised in the electricity and gas ordinances;
- Performance of contracts to which the data subject is party. In particular:
  - o the obligation to communicate consumption data to energy suppliers in order to bill for the energy consumed;
  - o the access services requested by the energy suppliers;
  - o metering data reporting obligations to energy service providers, particularly in the context of flexibility;
- Survey conducted on services and works performed by Sibelga, in order to improve quality of service;
- Performance of the lease agreements or rights in rem relating to properties owned by Sibelga;
- Examination of metering data to detect abnormal consumption;

- Management of rights and obligations, and billing of customers supplied by Sibelga as supplier of last resort ("Protected Customers");
- Management of the rights and obligations, and billing of customers supplied by Sibelga in the context of non-billed consumption by a supplier, or by Sibelga acting as supplier of last resort;
- Management of complaints, including claims, and questions posed by data subjects, in particular on Sibelga's websites ([www.sibelga.be](http://www.sibelga.be); [www.energuide.be](http://www.energuide.be));
- Management of recovery of amounts owed by users of gas or electricity networks in the context of administrative, technical or supply services;
- Collaboration with Brugel, the regulatory authority for the energy market in the Brussels-Capital Region;
- Performance of contracts with subcontractors or other market players;
- Information and communication to public representatives.

#### VI. Data recipients

Under no circumstances does Sibelga communicate personal data to third parties without the express consent of the data subject, or without a contract to which the data subject is a party, or that a law or ordinance clearly requires. In this context, Sibelga may be obliged to communicate data to the judicial, police, tax or other authorities where they may take advantage of a legal provision that requires Sibelga to disclose information it holds.

To carry out its public interest missions, Sibelga has also concluded contracts with subcontractors. Where these contracts relate to personal data, Sibelga shall ensure that subcontractors provide sufficient guarantees for the implementation of appropriate technical and organisational measures to ensure that the processing meets the requirements of the General Data Protection Regulation and guarantee the protection of the rights of the data subject, and to conclude contracts within the meaning of Article 28 of the General Data Protection Regulation.

Sibelga has also entered into access agreements with energy suppliers active in the Brussels-Capital Region. Sibelga and these suppliers exchange end-user personal data to enable the smooth functioning of the Brussels energy market. This exchange of data is, however, organised in such a way as to satisfy the requirements for the protection of personal data.

In some cases, the collected data may be transmitted to third parties responsible for the recovery of unpaid claims, be they bailiffs, lawyers, etc. The data can therefore be found in a court file if Sibelga is forced to take such extreme measures.

The data is not disclosed to third parties other than those mentioned in this policy, and is not used for promotional, commercial or direct marketing purposes.

#### VII. Personal data protection measures

Sibelga takes the necessary physical, technical and organisational measures to prevent any accidental or unlawful destruction, accidental loss, unauthorised change, unauthorised disclosure or access, misuse, or any other illegal forms of processing personal data.



These measures vary according to the type of data processed and how this data is collected and/or retained. Where appropriate, security measures include encrypting and guaranteeing the integrity of communications and data during storage using appropriate standards, firewalls, access control, threat detection and prevention systems, separation of duties, and similar security protocols.

The details of these measures are part of a security policy whose content and operation are regularly tested by internal and external audits.

Protection measures include:

- data access management,
- the principles of data protection design and data protection by default,
- the principle of minimising the processed data,
- physical security,
- information security,
- staff training;
- selection and monitoring of subcontractors.

Sibelga maintains policies on these protection measures. These policies are made available to its staff and subcontractors in a clear and understandable form.

These data protection measures are constantly evolving.

When a type of processing, in particular through the use of new technologies, and taking into account the nature, scope, context and purpose of the processing, is likely to create a high risk for the rights and freedoms of end-users, Sibelga conducts an analysis of the impact of the envisaged processing operations on the protection of personal data prior to commencing the processing.

VIII. Duration of data conservation

Sibelga is aware of its obligations regarding the retention period of personal data and takes steps to ensure the systematic destruction of these data after a certain period of time. These measures must take into account technical and financial constraints related to their gradual implementation within Sibelga's IT systems.

Ultimately, Sibelga's objective is not to store any personal data beyond the time required to fulfil its missions that are in the public interest, its legal or regulatory obligations, or its contractual obligations. Until an appropriate technical solution is applied to each component of the information system in order to ensure data destruction or anonymisation after a certain period of time, Sibelga ensures that access to data and, more specifically, personal data by its workers is restricted. Sibelga has transitional processes to provide a timely response to any request in this area as described in Chapter IX below.

For each new project or implementation of a data processing infrastructure, Sibelga shall take measures to destroy or anonymise personal data that are no longer necessary for the performance of its public interest missions, its legal or regulatory obligations, or contractual obligations.

While Sibelga makes every effort to fulfil its obligations regarding the protection of personal data, it is possible that after erasing this data from our applications residual copies may not be immediately removed from active applications and backup systems.

In any case, Sibelga complies with the legal requirements regarding the data retention period. This period is ten years for the data referred to in Article 24ter, section 4, para. 5 of the electricity ordinance and five years for the data referred to in Article 18ter, section 4, para. 5 of the gas ordinance.

Sibelga will assess this chapter at regular intervals.

## IX. Rights of data subjects

The protection regulations confer rights on data subjects.

The exercising of these rights is free of charge and is dealt with as soon as possible with the greatest care.

The rights of data subjects fall into several categories.

### 1. *Right to information and access to data*

Sibelga informs data subjects that it processes their personal data. This information is reflected in this policy. This policy is published on the Sibelga website and is referred to when Sibelga communicates with users of the distribution network. A reference to this policy is also included in the terms and conditions on the reverse of the documents addressed to network users.

Each individual also has the right to access his or her data and to become aware of certain information relating to this data and, in particular:

- The aims of the processing,
- The categories of personal data processed,
- The recipients or categories of recipients of the data,
- As far as possible, the data retention period,
- The right to complain to the Data Protection Authority,
- Information on the origin of the data processing if it is not obtained directly by Sibelga,
- The potential for automated decision making, including profiling.

### 2. *Right to rectification*

Each natural person has the right to ask Sibelga to complete or rectify his or her personal data if they are inaccurate or incomplete. This right of rectification does not, however, apply where Sibelga must comply with a legal obligation or perform a mission in the public interest, including the management of metering data.

### 3. *Right to deletion ("Right to be forgotten")*

Each natural person has the right to obtain the deletion of his or her personal data where:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent upon which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there is no compelling legitimate reason for the processing;
- the personal data has been subject to unlawful processing.
- personal data must be deleted in order to comply with a legal obligation provided for by European Union law or by the law of the Member State to which Sibelga is subject.

This right to be forgotten does not, however, apply where Sibelga must comply with a legal obligation or perform a mission in the public interest, including the management of metering data. Sibelga will then provide all necessary explanations to the data subject, including the right to lodge a complaint with the competent authorities.

### 4. *Right to restriction of processing*

Each individual has the right to have Sibelga limit the processing of their data where one of the following applies:

- The individual disputes the accuracy of the personal data: in this case, the use of data is limited for a period during which Sibelga will verify the accuracy of the data;
- The processing of the data is unlawful and the data subject opposes the deletion of the personal data and requests the restriction of its use instead;
- Sibelga no longer requires the personal data for the purpose of processing but it is still necessary for the data subject to ascertain, exercise or defend legal rights;
- The data subject has objected to the processing of his or her data during the verification as to whether the legitimate grounds pursued by Sibelga override those of the data subject.

Where processing has been restricted, such data may, with the exception of retention, only be processed with the consent of the data subject, or for the establishment, exercising or defence of rights in court, or for the protection of the rights of another natural person or legal entity, or for important reasons of public interest.

Before the restriction on processing is lifted, Sibelga will inform the data subject who was granted restriction of processing.

#### *5. Right to data portability*

Each individual has the right to receive his or her personal data and has the right to transfer this data to another data controller without interference by Sibelga, where the processing is based on consent or a contract and the processing is performed using automated methods. This right does not apply to the processing necessary to carry out a mission in the public interest or subject to the exercise of the public authority vested in Sibelga.

When the data subject exercises his or her right to portability, he or she has the right to have personal data transmitted directly from one controller to another, where technically possible.

#### *6. Right to object and automated individual decision-making*

Each individual has the right to object to the processing of his or her data, for reasons relating to their particular circumstances, except where such processing is based on the need for such processing in performing a mission in the public interest or falling within the scope of the exercise of public authority vested in Sibelga.

In this situation, Sibelga will no longer process personal data unless it demonstrates that there are legitimate and compelling reasons for the processing that prevail over the interests and rights and freedoms of the data subject, or the recognition, exercising or defence of rights in court.

Provided that such a decision is not necessary for the performance of a contract between the data subject and a controller, whether authorised by the substantive law or the person has given consent, each individual has the right not to be the subject of a decision based exclusively on automated processing, including profiling.

#### *7. Procedures for the exercising of the rights referred to in points 1 to 6.*

Each individual may exercise the rights referred to in points 1. to 6. above by sending a written and signed request to:

Sibelga S.C.R.L.  
Data Protection Officer

Quai des Usines, 16  
1000 Brussels  
[dpo@sibelga.be](mailto:dpo@sibelga.be)

Proof of the identity of the individual exercising his or her rights will be requested (copy of the identity card of the data subject and, if applicable, a warrant consistent with this).

Sibelga will endeavour to respond as soon as possible and, in any event, in compliance with its legal and regulatory obligations.

*8. Right to contact the Data Protection Authority*

Each individual may also contact the Data Protection Authority, where appropriate, to lodge a complaint:

Data Protection Authority  
Rue de la Presse, 35  
1000 Brussels  
[www.autoriteprotectiondonnees.be](http://www.autoriteprotectiondonnees.be)  
+ +32 0 2 274 48 00

X. Cooperation with the authorities

Sibelga works with the supervisory authorities, including the Data Protection Authority, to respond to complaints about the transmission of personal data that cannot be resolved directly with data subjects.

Within the framework of the requests formulated by the regional authority regulating the energy market in the Brussels-Capital Region, BRUGEL, Sibelga can communicate personal data to this authority. It also communicates data to Brussels Environment so that it can fulfil its own legal obligations and in particular perform an energy audit of the region. Sibelga ensures in this context that it limits the communication of this data as strictly as required.

Where a public authority, particularly in the context of a judicial investigation, a request from the police or social or tax inspectorates, requests the transmission of personal data, Sibelga shall ensure the legality of the request as well as its reasonableness and proportionality.

In addition, Sibelga may also enter into agreements with public authorities for the transmission of personal data in order to fulfil its own legal obligations. Sibelga will arrange to publish these agreements in whole or in part on its website.

XI. Right to change the policy regarding the processing of personal data

This privacy policy may be updated periodically to reflect changes in Sibelga's personal data protection practices and to reflect technical, legal and/or organisational developments.

Sibelga's management committee is responsible for updating this policy to take into account technical and legal developments regarding the protection of personal data. When an update relates to a key element of this policy, it will be decided by the Steering Committee.

These modifications will be made known to the public by their publication on the website [www.sibelga.be](http://www.sibelga.be)

Previous versions of the policy on the processing of personal data will remain available on Sibelga's website (<https://www.sibelga.be/fr/publications>).

XII. Cookies policy and clauses related to the sending of emails

The cookie policy of Sibelga's websites ([www.sibelga.be](http://www.sibelga.be), [www.energuide.be](http://www.energuide.be), [www.app.energuide.be](http://www.app.energuide.be)) is attached as Annex 2 to this policy.

This annex is published on Sibelga's websites and may be subject to change. These changes can be approved after the fact as part of an amendment to this policy.

Every email from Sibelga is accompanied by a disclaimer, clearly visible to the recipient. This clause is written as follows:

*This e-mail and any annexes thereto may contain confidential and/or proprietary information and are intended for the exclusive use of the recipient(s) mentioned above. Any use – including, but not limited to, reproduction, communication or total or partial distribution in any form whatsoever – of their content by persons other than the intended recipient(s) is prohibited. If you have received this email in error, please inform the sender either by telephone or email and delete any related data from all computers. Thank you for your cooperation. Despite the precautions taken, emails can be intercepted, modified, lost, destroyed or contain viruses. We do not accept any liability for any damage that may be caused in this event. Anyone who communicates with SIBELGA by email is assumed to accept this risk.*

This clause is enforceable and applicable to recipient(s) of the email unless they have clearly indicated to the sender of the email that they objected to its application.



### **Annex 1 – Glossary of terms**

- Electricity Ordinance: Ordinance of 19 July 2001 on the organisation of the electricity market in the Brussels-Capital Region (*Moniteur Belge*, 17 November 2001), as amended;
- Gas Ordinance: Ordinance of 1 April 2004 on the organisation of the gas market in the Brussels-Capital Region, concerning gas and electricity road tolls and amending the ordinance of 19 July 2001 relating to the organisation of the electricity market in the Brussels-Capital Region (*Moniteur Belge*, 26 April 2004), as amended;
- Technical regulation for electricity: Brugel Decision 80 of 5 December 2018 on the approval of proposals for electricity and gas technical regulations submitted by the manager of electricity and gas distribution networks, SIBELGA (*Moniteur Belge* 05/02/2019);
- Technical regulation for gas: Brugel Decision 80 of 5 December 2018 on the approval of proposals for electricity and gas technical regulations submitted by the manager of electricity and gas distribution networks, SIBELGA (*Moniteur Belge* 05/02/2019);
- General Data Protection Regulation: *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (OJEU 4 May 2016, L.119)*;
- Supplier: any natural or legal person selling electricity, having a supply licence granted in accordance with the electricity ordinance or gas ordinance;
- Processing: any operation or set of operations, whether or not performed by automated processes, and applied to data or sets of personal data, such as collection, recording, organisation, structuring, preservation, adaptation or modification, extraction, consultation, use, transmission, broadcasting or any other form of provision, alignment or interconnection, restriction, deletion, or destruction;
- Personal data: any information relating to an identified or identifiable natural person (referred to as the "data subject") who is deemed to be an "identifiable natural person", a natural person who can be identified directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific elements unique to their physical, physiological, genetic, psychological, economic, cultural or social identity;

## **Annex 2 – Cookie policy**

This annex covers the cookie policy applied on Sibelga's websites ([www.sibelga.be](http://www.sibelga.be), [www.energuide.be](http://www.energuide.be), [www.app.energuide.be](http://www.app.energuide.be)).

### What are cookies and why do we use them?

Cookies are small text files that are stored on your computer when you use our websites. Among other things, they map information about your browser type, operating system, website visit and personal preferences. The use of cookies allows us to offer you the best user experience. With cookies we can:

- constantly optimise our website;
- remember your preferences so that you do not have to routinely re-enter or reupload the same information when using our website;
- improve the security and speed of our website.

### The type of cookies we use

The websites [energuide.be](http://energuide.be) and [app.energuide.be](http://app.energuide.be) use two types of cookies:

#### 1. Essential cookies

Essential cookies are cookies that are essential for the functioning of a website. They ensure that basic functions such as page navigation, security and loading time can work.

#### 2. Analytical cookies

Analytical cookies collect information about the behaviour of visitors to the website and its performance. The website can be improved based on the results and visitors get a better user experience.

### What cookies are placed via our site?

#### First-party cookies

We use first-party cookies or direct cookies that serve to improve your user experience on [energuide.be](http://energuide.be) or [app.energuide.be](http://app.energuide.be). This means that these cookies will only collect information on our websites themselves. These direct cookies regulate the technical part of the websites and retain certain characteristics of the visitor.

#### PHPSESSID (session cookie)

- Type: essential cookie
- Life span: until the end of the navigation session
- Purpose: this cookie establishes communication between the web server and the browser, and temporarily stores information about your session. For example, it ensures that you do not have to complete a form again if you reload the page or make a mistake.

#### \_gid (Google Analytics tracking cookie)

- Type: analytical cookie
- Life span: 24 hours
- Purpose: to distinguish unique users and measure their use of the website.

\_ga (Google Analytics tracking cookie)

- Type: analytical cookie
- Life span: 2 years
- Purpose: to distinguish unique users and measure their use of the website.

\_hjIncludedInSample (Hotjar)

- Type: analytical cookie
- Life span: session
- Purpose: help for Hotjar features by identifying users during a session. Hotjar collects user templates and shows what users look at and where they click on the website.

picreel\_tracker\_\_first\_visit, picreel\_tracker\_\_page\_views, picreel\_tracker\_\_visited (Picreel)

- Type: analytical cookie
- Life span: from 24 hours to indefinite
- Purpose: targeted advertising

Third-party cookies

In addition, Google Analytics, as a third party, also places cookies via our websites. These cookies keep users' browsing behaviour up to date and establish a user profile based on this data. Although Google Analytics stores the information provided by the site for us, we control the use of the data.

\_\_hssc, \_\_hssrc, \_\_hstc, mp\_6d7c50ad560e01715a871a117a2fbd90\_mixpanel (third party cookies - .hotjar)

- Type: performance cookie
- Life span: from the end of the session to 2 years
- Purpose: These cookies are linked to the HubSpot platform and may be used for website analysis purposes.

hubspotutk (third party cookies - .hotjar)

- Type: functional cookie
- Life span: 10 years
- Purpose: This cookie is linked to the HubSpot platform and may be used for user authentication purposes.

\_\_lc.visitor\_id.xxxxxxx (third party cookies - .picreel.com)

- Type: functional cookie
- Life span: 3 years
- Objective: this cookie identifies a repeat visitor to the website.

lc\_window\_state (third party cookies - .picreel.com)

- Type: functional cookie
- Life span: session
- Purpose: This cookie controls whether the live chat window is open or closed.

mp\_c131ee1f6b73344380c0b12f1620e3ab\_mixpanel, picreel\_new\_price, referral (third party cookies - .picreel.com)

- Not defined

How to disable cookies

It is possible to disable and delete cookies, or to adjust settings, even if our websites will no longer work optimally. Do you still want to adjust the settings related to cookies? Here you will find instructions for different browsers:

- [Mozilla FireFox](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari \(iOS\)](#)
- [Safari \(macOS\)](#)
- [Edge](#)

**Versions**

Version	Date	Author / author of the change	Approval by the steering/management committee	Changes to the articles
V1	May 2019	DPO	11/06/2019	Initial version
V2				