

Privacy policy Finc

Finc is committed to protecting your privacy and always processes personal data in accordance with applicable regulations and this privacy policy. This privacy policy contains information on how Finc handles data collected through the Finc platform. We invite you to read this privacy policy thoroughly before you send data via the Finc platform.

1. Who is Finc and what is the Finc platform?

Finc is a trade name of the company Gudrun Xpert NV, with registered office at Kantersteen 47, 1000 Brussels, registered in the CBE under the number 0477.315.422. Gudrun Xpert is responsible for personal data collected and processed through the Finc platform.

Finc is also the name of Gudrun Xpert's online platform for real estate identification and valuations. Through the platform, data is collected and processed on the real estate for which an identification or estimation is needed (e.g. when a credit is requested for the property or a guarantee is to be established on it).

Through the platform, the property is accurately identified and its properties are mapped. Depending on the context in which the platform is used, an automated valuation of the property can take place. Through the platform, different types of property estimates can also be requested, such as a statistical estimate with desktop validation (desktop estimate) or an estimate with on-site visit of the property.

The Finc platform may be offered in cooperation with partners such as Banks as part of their lending process. In this case, the partner may also process your personal data and we invite you to check the partner's privacy policy.

2. What personal data does Finc process, on what grounds and for what duration?

Finc processes data about the property for which an identification or estimation is requested. It is your responsibility to have a legitimate interest in transmitting the data about the property (e.g. you are the potential buyer or owner of the property).

When a desktop estimate or estimate with on-site visit is requested, Finc processes additional data, including client, payment and billing details as well as contact details for making an appointment, in addition to data about the property.

2.1 What personal data does Finc process in which scenarios?

The following is an overview of what data Finc collects and processes in the different usage scenarios of the platform:

A. Identification and/or statistical market value estimation of the property: processing Property data

Where the platform is only used to identify the property and perform an automated valuation (e.g. where the platform is used in conjunction with a partner such as a bank and no desktop estimation or estimation with on-site visit is required), Finc in principle only processes data regarding the property, including:

- The address and location details of the property;

- Information about the plot (e.g. cadastral data, area, etc.);
- The type of property and purpose of the property (e.g. residential, commercial, hospitality, industrial, etc.);
- Relevant property characteristics such as year of construction, habitable area, number of floors, number of bathrooms, number of bedrooms, presence of terrace/garden/garage, etc., EPC scores, general condition of the property, presence of insulation and double glazing, technical specifications (type of heating system, air conditioning), solar panels, etc.
- Any supporting documents (e.g. EPC certificate)
- Information and documents on works to be carried out;
- The transaction value of the property and other relevant values (e.g. rent);

These data are hereinafter referred to as the '**Real Estate Data**'.

Finc processes the Real Estate Data primarily to clearly identify the property and, if necessary, to perform an automated valuation of the property. Finc links the Real Estate Data with data about the property from various data sources, including open data made available by public authorities (e.g. land registry). If the platform is used in cooperation with a partner such as a bank, Finc shares the collected Real Estate Data with this partner.

B. Desktop estimation and estimation with on-site visit

When a desktop estimate or estimate with site visit is requested via the platform, in addition to the Real Estate Data mentioned above, Finc also processes client, payment and billing data and, in the case of an estimate with site visit, contact details for making an appointment.

In this case, Finc processes the following data of the person placing the order:

- Identity data (surname and first name)
- Address details
- Contact details (phone number and e-mail address)
- Invoicing and payment details

This data is hereinafter referred to as '**Client Data**'.

When the Client requests an estimate with a site visit, Finc additionally processes the data of the contact person for the site visit. This includes identity data (surname and first name) and contact data (telephone number and e-mail address) and information on the availability of the contact person. Finc processes the contact person's data in order to schedule and carry out the site visit. These data are referred to below as '**contact person data**'.

2.2. Purposes of processing

We process data for various purposes as described below.

Client data and Real Estate data are processed for the following purposes.

Purpose of processing	Legal basis	Retention period
To respond to requests for information or quote the price for a job;	Performance or preparation of the agreement	30 years
To perform the estimation assignment correctly, prepare the estimation report and communicate the estimation report to the Client (and depending	Performance of the agreement	30 years

on the context of the assignment also to the partner through which the Client arrives at Finc, e.g. the bank where the Client applies for a credit);		
To receive payment for the estimation order, for billing and accounting purposes.	Performance of the agreement and legal obligation	30 years
To provide after-sales services related to the order executed;	Performance of the agreement and legal obligation	30 years
To deal with (legal) disputes and complaints relating to the order executed;	Performance of the agreement and legitimate interests of Finc	30 years
To verify the integrity of valuation reports and prevent fraud;	Performance of the Agreement, legitimate interests	30 years
For archiving purposes and in order to comply with legal obligations;	Legal obligations	30 years
To meet professional obligations as an independent appraiser.	Legal obligations	30 years

Contact data will be processed for the following purposes:

Purpose of processing	Legal basis	Retention period
To schedule an estimate with on-site visit and keep in touch with the contact person about the appointment made	Performance or preparation of the agreement	6 months
To deal with (legal) disputes and complaints relating to the order executed;	Performance of the agreement and legitimate interests of Finc	30 years
To verify the integrity of valuation reports and prevent fraud;	Performance of the Agreement, legitimate interests	30 years

Finc further processes **the Real Estate Data** for the general purpose of improving the to enhance the quality and accuracy of future valuations and to improve the estimation and directly related services of Finc. In particular, this involves the following processing purposes. When Finc processes the Real Estate Data for these purposes, it always does so separately from the Client Data and does not associate the Real Estate Data with individual persons:

Purpose of processing	Legal basis	Retention period
<i>Statistical research and development:</i> - Building, maintaining, improving and using advanced statistical models for property valuation;	Legitimate interest	Unlimited.

- Deriving aggregated property market trends and evolutions (e.g. price level evolutions in a given region or city, evolution of property properties over time, generation of tables and graphs, etc.)		
<i>Comparison points database:</i> Build, maintain, enhance and use a reference database of comparable properties and transactions in the context of future estimates and in line with professional requirements for estimates	Legitimate interest	20 years after collection of real estate data

3. What rights do you have when Finc processes your personal data as a data controller?

When Finc processes your personal data as a data controller, you have a number of rights in relation to Finc.

Right of access - You have the right to ask Finc at any time to access the personal data that Finc processes in relation to your person.

Right to rectification (adjustment) - Furthermore, you have the right to have your personal data, to the extent that they are inaccurate or outdated, rectified. As an end user, you can make certain adjustments yourself via the closed section of the website. In other cases, you can request these adjustments from Finc.

Right to data erasure - In the legally defined cases, you also have the right to have your personal data erased. E.g. when the data provided are no longer necessary for the purposes for which they were collected or processed.

Right to restriction of processing - To the extent applicable, you also have the right to restrict the processing of your personal data. E.g. for the period Finc needs to verify the accuracy of the personal data when you dispute the accuracy of the personal data processed.

Right to data portability - Where applicable, you have the right to portability of the personal data you have provided to Finc.

Right to object - Where applicable, you have the right to object to the processing of your personal data.

Right to lodge complaint with supervisory authorities - If you believe that Finc is processing your personal data unlawfully, you always have the right to lodge a complaint with the competent supervisory authorities.

How can you exercise your rights?

Do you wish to exercise your rights vis-à-vis Finc? Please contact Finc at privacy@finc.be stating your identity and giving a clear description of your request. If there is ambiguity or uncertainty about your identity, Finc may ask for additional information to verify your identity or clarify your request.

4. Does Finc disclose your personal data to third parties?

Finc does not simply pass on your personal data to third parties.

Finc may use service providers as part of its operations (e.g. for sending e-mails containing information, for hosting the platform, for administration and accounting). Finc only cooperates with service providers who offer the necessary guarantees in terms of compliance with applicable regulations and who offer a high level of security and data protection.

To the extent that Finc uses service providers located outside the EU then Finc takes all necessary measures to ensure that these service providers respect at least the same norms and standards as those in force within the EU. More information on this can be obtained at privacy@finc.be.

In certain circumstances, Finc may need to share or transfer your data with authorities. This may be, for example, to comply with the law or a court order, to detect fraud or security problems and to address or protect Finc's rights.

If the Finc Platform is used in the context of cooperation with a partner (e.g. a bank as part of its credit granting process), Finc may communicate the data collected through the Platform and the valuation and underlying data to the partner in question so that it can use the data for its own purposes and the bank's own privacy policy.

5. Where can you ask questions about how Finc processes your personal data?

You can ask questions about how your data is processed at any time at privacy@finc.be.

If you believe that we are processing your Personal Data unlawfully, you have the right to lodge a complaint with the competent data protection authorities. For Belgium, the competent authority is the **Data Protection Authority** - www.dataprotectionauthority.be.

6. What happens if you decide not to provide your personal data

If you choose not to provide details when requested, you may not be able to use the platform and we may not be able to carry out the property identification or valuation task.

7. Can this privacy policy change?

We may change our Privacy Policy from time to time for various reasons. For example, we may amend this Privacy Policy to comply with changes in applicable laws and regulations, when we provide new services or content or make changes to the services or content we provide.

To the extent possible, we may also notify you of important changes by e-mail.