



# PRIVACY STATEMENT

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# Introduction

Your privacy and trust are important to us and this Privacy Statement (“Statement”) provides important information about how **Market Intelligence Group SA** (MIG) and its worldwide affiliated companies and subsidiaries (“MIG,” “we,” or “us”) handle personal information. This Statement applies to any MIG website, application, product, software, or service that links to it (collectively, our “Services”). Occasionally, a Service will link to a different Privacy Statement that will outline the particular privacy practices of that Service.

Please read this Statement carefully and contact our data protection officer if you have any questions about our privacy practices or your personal information choices. It is important that you check back often for updates to this Statement. If we make changes we consider to be important, we will let you know by placing a notice on the relevant Services and/or contact you using other methods such as email.

*This Statement was last updated on April 1, 2018.*

## Personal information

MIG is committed to the responsible handling and protection of personal information. Personal information means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

We collect, use, disclose, transfer, and store personal information when needed to provide our Services and for our operational and business purposes as described in this Statement. We want to be clear about our privacy practices so that you can make informed choices about the use of your information, and we encourage you to mail at [info@energymarketprice.com](mailto:info@energymarketprice.com) at any time with questions or concerns.

## The types of personal information we collect

We collect personal information from you, for example, if you request information, purchase or use our Services, or request customer support. We may ask you to provide information such as your name, phone number, email address, user name and password, and information about your device. We also collect personal information from third parties such as our partners, service providers, and publicly available websites, to offer Services we think may be of interest and to help us maintain data accuracy and provide and enhance the Services.

In addition, our servers, logs, and other technologies automatically collect certain information to help us administer, protect, and improve our Services; analyse usage; and improve users' experience. **We do not share personal information with others.**

## How we use personal information

We process personal information for these Service- and business-related purposes:

**Account setup and administration:** We use personal information such as your name, email phone number, and information about your device to set up and administer your account, provide technical and customer support and training, verify your identity, and send important account, subscription, and Service information.

**Personalization:** We use personal information to deliver and suggest tailored content such as news, research, reports, and business information and to personalize your experience with our Services.

**Marketing:** We use personal information to deliver marketing to you via email and online. If we send you a marketing email, it will include instructions on how to opt out of receiving these emails in the future. We also maintain email preference centres for you to manage your information and marketing preferences. *Please remember that even if you opt out of receiving marketing emails, we may still send you important Service information related to your accounts and subscriptions.*

- **Hosted services:** Some of our Services provide data and document storage as an integral part of the product or solution offering. Documents and data stored by our customers may contain personal information in business and financial data for example. Any information stored by or on behalf of our customers is controlled and managed by and only made accessible to those customers or others our customers may authorize from time to time. Our access to this information is limited to MIG personnel with a critical business reason, such as technical support.
- **Legal obligations:** We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

## When we share personal information

MIG shares or discloses personal information when necessary to provide Services or conduct our business operations as described below. When we share personal information, we do so in accordance with data privacy and security requirements. We may occasionally share non-personal, anonymized, and statistical data with third parties. Below are the parties with whom we may share personal information and why.

- **Our third-party service providers:** We partner with and are supported by service providers. Personal information will be made available to these parties only when necessary to fulfil the services they provide to us, such as software, system, and platform support; cloud hosting services; data analytics; and order fulfilment and delivery.

## Where we store and process personal information

MIG is a European organization, and your personal information is stored and processed in Belgium. We take steps to ensure that the information we collect is processed according to this Privacy Statement and the requirements of Belgian law.

We collaborate with third parties such as cloud hosting services. We take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. In some cases, we may need to disclose or transfer your personal information within MIG or to third parties in areas outside of your home country.

## How we secure personal information

MIG takes data security seriously, and we use appropriate technologies and procedures to protect personal information. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

For example:

- **Policies and procedures**
  - We have measures in place to protect against accidental loss and unauthorized access, use, destruction, or disclosure of data
  - We have a Business Continuity and Disaster Recovery strategy that is designed to safeguard the continuity of our service to our clients and to protect our people and assets
  - We place appropriate restrictions on access to personal information
  - We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
  - We conduct Privacy Impact Assessments in accordance with legal requirements and our business policies

- **Training for employees and contractors**

- We require privacy, information security, and other applicable training on a regular basis for our employees and contractors who have access to personal information and other sensitive data

- We take steps to ensure that our employees and contractors operate in accordance with our information security policies and procedures and any applicable contractual conditions

## How long we keep personal information

We retain personal information for as long as we reasonably require it for legal or business purposes, which is not more than 36 months after collecting the information, except for actual clients. In determining data retention periods, MIG takes into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal information, we securely delete or destroy it.

## Your right to access and correct your personal information

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete your personal information.

- **Access to personal information:** If you request access to your personal information, we will gladly comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data.
- **Correction and deletion:** You have the right to correct or amend your personal information if it is inaccurate or requires updating. You may also have the right to request deletion of your personal information; however, this is not always possible due to legal requirements and other obligations and factors. Remember that you can update your account information by using the “Contact Us” option.

- **Marketing preferences:** To opt out of email marketing, you can use the unsubscribe link found in the email communication you receive from us.
- **Filing a complaint:** If you are not satisfied with how MIG manages your personal data, you have the right to make a complaint to a data protection regulator which is: <https://www.privacycommission.be/>

In case you have specific questions regarding this Statement, please do not hesitate to get back to us.

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