

Privacy Statement

Privacy Statement addressed to individuals who register on the Do Not Call Me list and to licence holders of the Do Not Call Me list.

The processing of personal data (hereinafter “data”) is carried out by DNCM VZW in compliance with the General Data Protection Regulation (GDPR) and the Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data (hereinafter “GDPR”).

Responsible for data processing

The non-profit organisation Do Not Call Me (DNCM) was recognised on 28 June 2015 by Royal Decree as the official manager of licences for the Do Not Call Me list.

DNCM VZW acts as:

- **Data controller** for the processing of personal data of **licence holders** (companies and organisations that purchase or use access to the list). In this case, DNCM VZW determines the purposes and means of the processing itself, including account management, invoicing, communication and compliance with legal obligations.
- **Data processor** for the processing of **call numbers** of data subjects who have registered as a subscriber on the Do Not Call Me list. In this context, DNCM ASBL/VZW processes these data solely on behalf of and under the instructions of the Belgian State (FPS Economy), which has established the legal basis and for which DNCM ASBL/VZW provides the operational implementation.

More information about your rights as a subscriber or how to lodge a complaint against unwanted advertising when your number is included on the Do Not Call Me list can be found [here](#).

A licence for the Do Not Call Me list is a legal obligation for all companies engaged in telemarketing in Belgium. The list allows subscribers to register free of charge if they no longer wish to receive unsolicited commercial phone calls. Companies conducting commercial calling campaigns are legally required to remove the numbers listed on the Do Not Call Me list from their calling lists.

The list helps subscribers better protect their privacy while also providing companies with clarity as to whom they may or may not contact for commercial telemarketing purposes

To whom does this Privacy Statement apply?

This Privacy Statement applies to:

- natural persons who register their telephone number on the Do Not Call Me list;
- natural or legal persons who hold a licence for the Do Not Call Me list;
- visitors to the website www.dncm.be.

Which data do we process?

When you register on the Do Not Call Me list:

- landline and/or mobile telephone number
- date of registration

When you are a licence holder of the Do Not Call Me list:

- name, first name and email address of the contact person
- name and legal form of the organisation
- address and VAT number or company number
- number of employees

- type of licence holder
- type of licence
- date of purchase, renewal and/or deletion of the licence
- payment history
- login and usage data

When you contact DNCM ASBL/VZW via the website, by email or by phone:

- name, email address, telephone number and the content of your message

We only collect data that are strictly necessary for the purposes set out below.

Why do we process your data and on what legal basis?

Purpose	Legal basis (Art. 6 GDPR)	Data subjects
Consultation of your registration on the Do Not Call Me list	Legal obligation (art. 6.1.c) – Code of Economic Law, Articles VI.111–115	Subscribers
Making the list available to authorised licence holders	Legal obligation (art. 6.1.c)	Subscribers
Management of licence holders, invoicing, follow-up and disputes	Performance of a contract (art. 6.1.b)	Licence holders
Responding to questions via the website, telephone or email	Legitimate interest (art. 6.1.f)	All data subjects
Fraud prevention, IT security and abuse detection	Legitimate interest (art. 6.1.f)	All data subjects
Legal obligations (accounting, archiving)	Legal obligation (art. 6.1.c)	Licence holders
Statistical reporting and internal analysis	Legitimate interest (art. 6.1.f)	Licence holders
Sending information about our services, updates or initiatives	Consent (art. 6.1.a)	Licence holders and interested parties
Analysis of website behaviour to improve functionality and user experience (via functional and analytical cookies)	Consent (art. 6.1.a)	Website visitors

With whom do we share your data?

Your data may only be shared with:

- service providers (processors) acting on behalf of DNCM ASBL/VZW (e.g. call centres, IT providers, cloud services), solely in accordance with our instructions and under strict confidentiality obligations;
- licence holders of the Do Not Call Me list: they only receive your telephone number(s) and the date of registration. The list must be used by licence holders to remove the telephone numbers included on the Do Not Call Me list from their internal calling databases;
- competent authorities where legally required.

Transfer of data outside the European Economic Area

Your data will only be transferred outside the European Economic Area under the following conditions:

- applicable data protection legislation is complied with;
- the third country ensures an adequate level of data protection in accordance with Article 45 GDPR, or
- appropriate safeguards are provided in accordance with Article 46 GDPR, such as the European Commission's standard contractual clauses, possibly supplemented by additional technical or organisational measures to ensure an equivalent level of protection, in line with the case law of the Court of Justice of the European Union.

DNCM VZW always ensures that these safeguards are effectively applied and that transfers are limited to what is strictly necessary for the performance of its tasks.

How long do we retain your data?

Type	Retention Period
Data of registered telephone numbers on the Do Not Call Me list	DNCM VZW acts as a processor for these data The retention period is determined by the controller, the Belgian State (FPS Economy)
Data of licence holders	Maximum 10 years after the end of the last licence, in accordance with accounting legislation
Contact requests via the website or by email	2 years after completion of the request
Login and usage data of (former) licence holders	Maximum 10 years after the end of the last licence, in accordance with accounting legislation
Login and usage data of registered accounts that are not (former) licence holders	Maximum 2 years

Security of your data

We take appropriate technical and organisational measures to protect your data against loss, unlawful use or unauthorised modification.

All staff members who process personal data are bound by confidentiality obligations and receive training on data protection.

Your rights

You have the following rights:

- the right to access your personal data;
- the right to rectification of inaccurate data you have provided to DNCM VZW in its capacity as controller;
- the right to object to processing based on legitimate interest and/or consent;
- the right to erasure;
- the right to restriction of processing;
- the right to data portability of the personal data you have provided and for which DNCM VZW acts as controller.

Exercising your rights

You may exercise your rights by contacting us, preferably by email. Depending on the nature of your request, we may ask for additional information to verify your identity in order to safeguard the protection of your personal data.

You may preferably address your request by email to dpo@dncm.be and/or dncm@dncm.be. Unless you instruct us otherwise, we will also respond by email. We will handle your request within 30 days after receipt of all necessary information. If your request is complex, this period may be extended by up to two months, in which case you will be informed in advance.

For more information about this Privacy Statement or if you have complaints regarding the protection of your personal data, you may contact our Data Protection Officer directly via dpo@dncm.be or in writing at: DNCM VZW – Raketstraat 50, 1130 Brussels.

You may also contact the Belgian Data Protection Authority, Drukpersstraat 35, 1000 Brussels, or by email at contact@apd-gba.be.