

## Privacy & Cookie Policy

Last Updated: 29.11.2024

This Privacy Policy regulates the processing of your personal data when using the Mbus application, available at [www.mbus.be](http://www.mbus.be) (hereafter: "Mbus").

Mbus is used by various organizations. The Data Controller for your data is determined based on the organization you wish to contact:

- Max Mobiel vzw, with its registered office at Kerkstraat 108, 9050 Gentbrugge, Belgium, and registered with the Kruispuntbank van Ondernemingen (K.B.O.) under number BE 0886.413.318. Max Mobiel vzw acts as the Data Controller for collaborations with Max Mobiel.
- MLSO, with its registered office at Sint-Paulusplein 27, 9120 Beveren, Belgium, and registered with the Kruispuntbank van Ondernemingen (K.B.O.) under number BE 223.944.690. MLSO acts as the Data Controller for the processing of personal data resulting from collaborations with MLSO.

Please read this Privacy & Cookie Policy carefully, as it contains essential information about how your personal data is processed via Mbus.

This Privacy Policy is in accordance with the European Regulation 2016/679 of April 27, 2016, concerning the protection of personal data.

### **1. Contact Information**

#### **Max Mobiel**

- By email: [maxmobiel@stad.gent](mailto:maxmobiel@stad.gent)
- By phone: +32 9 274 43 74
- By post: Bedrijfcentrum De Punt, Kerkstraat 108, 9050 Gentbrugge

#### **MLSO**

- By email: [info@mlso.be](mailto:info@mlso.be)
- By phone: +32 3 766 41 89
- By post: Sint-Paulusplein 27, 9120 Beveren

When using the terms "we," "us," and "our," reference is made to both Max Mobiel and MLSO. However, both organizations act separately as Data Controllers, depending on **which organization you wish to contact**. Under no circumstances do they act as joint Data Controllers.

## **2. Which Personal Data Do We Process?**

‘Data processing’ means any operation or set of operations performed on personal data, such as collecting, using, organizing, storing, modifying, updating, retrieving, consulting, distributing, archiving, deleting, managing, destroying, or communicating.

The personal data you provide to us includes the following:

- If you contact us (e.g., by email, phone): the personal data you provide to us;
- If you, as an employer, enter into an agreement with us: your billing information, name of the contact person(s) within your company; email address, phone number; user login credentials;
- If you, as an employee, use our services: your first and last name, phone number, email address, address and postal code, your personal QR code, your route and destination, and possibly your bank account number;
- If you, as a carrier, enter into an agreement with us: your billing information, name of the contact person within the company, and name of the driver(s).

We only place necessary cookies via [www.mbus.be](http://www.mbus.be). More information on this can be found in our Cookie Policy.

## **3. What Are the Purposes and Legal Grounds for Processing?**

We process your personal data in order to respond to your request based on your consent to the processing of personal data.

If you, as a carrier or employer, enter into an agreement with us, we process your personal data to perform the agreement between us, provide the service as agreed, and for billing purposes.

If you, as an employee, use our services, we process your personal data to provide you with the service and grant you access to the transportation you have requested.

You are not obliged to provide your personal data, but you understand that it is impossible to provide certain services if you refuse the processing.

The personal data we process will not be used for direct marketing purposes.

## **4. How Do We Secure Your Personal Data?**

We have taken adequate technical and organizational measures to ensure the secure processing of your personal data. These measures are consistent with the nature of the personal data and proportional to the potential severity of the risk. The risk of accidental or unauthorized destruction, loss, alteration, or access to and any other unauthorized processing of data is minimized.

Unfortunately, no risk can be entirely avoided. If unauthorized access is gained to our IT systems, we will immediately take all possible measures to minimize the damage to and/or theft of the data and inform the affected parties.

## **5. Selling or Disclosing Data to Third Parties**

We will not sell, rent, distribute, or otherwise commercially make your personal data available to third parties, except as described in this Privacy Policy, or based on a legal obligation or your prior consent.

In certain cases, we may need to disclose your personal data pursuant to a court order or to comply with other mandatory laws or regulations. We will reasonably attempt to inform you in advance, unless such disclosure is subject to legal restrictions.

In the event of a full or partial reorganization or transfer of our activities, where we reorganize, transfer, or cease our business activities, or in the case of bankruptcy, your data may be transferred to new entities or third parties that fully or partially take over our business activities. We will reasonably try to inform you in advance that we are disclosing your data to these third parties, but you also acknowledge that this may not always be technically or commercially feasible or permissible.

Additionally, we will share certain personal data about you as an employee who uses our services with the carrier to enable them to provide the service you requested, including: your personal QR code, your boarding point, and your first name.

The reservation data (identification details, route, and destination) of the employee will also be shared via our secure application with the employer, for billing purposes.

For questions about the processing of your personal data by your employer, we refer you to your employer.

## **6. Duration of Processing**

Personal data will be stored and processed by us for a period that is necessary for the purposes of the processing and the relationship between you and us.

If you, as an employee, use Mbus services, we will retain information related to the reservations you made for 2 years, after which we will anonymize this information for further research purposes.

If you, as an employer, terminate the agreement with us, we will delete the personal data you have provided via Mbus (i.e., user login credentials and contact details) within 2 years.

## **7. Your Rights**

Regarding your personal data, you also have the following rights:

### **Right to Access and Review:**

You have the right to access the personal data we have collected about you. This means you can request to know whether we collect personal data about you, which data it is, for what purposes we process it, and with which categories of third parties we may share it. We have 30 days to process and respond to your request.

**Right to Correction, Deletion, and Restriction:**

You have the right to have your personal data corrected, deleted, or restricted if it is incomplete, inaccurate, outdated, or inappropriate. You can contact us to make these changes, and we will update or remove the information within the legally prescribed deadlines. We also ask that you actively report any changes to your personal data to help us keep it up-to-date.

**Right to Data Portability:**

You have the right to receive your personal data, which we process, in a structured, commonly used, and machine-readable format and/or transfer it to other controllers.

**Right to Withdraw Consent:**

If the processing is based on your prior consent, you always have the right to withdraw that consent.

**Exercise of Your Rights:**

You can exercise your rights by contacting us using one of the methods mentioned in Section 1.

**Automated Decisions and Profiling:**

The processing of your personal data does not involve profiling, and you will not be subject to automated data processing.

**Right to File a Complaint:**

You have the right to file a complaint with the Data Protection Authority, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, Email: [contact@apd-gba.be](mailto:contact@apd-gba.be).

**8. Questions?**

If you have any questions, need more information about our privacy policy, or have complaints about your privacy, including the exercise of your rights, you can contact us.

## Cookie Policy

### **What Are Cookies?**

A “cookie” is a small file sent by Mbus’s server and placed on your computer’s hard drive. The information stored in these cookies can only be read by us and only during the duration of your visit to the website.

### **Why Do We Use Cookies?**

Our website uses cookies and similar technologies to distinguish your usage preferences from those of other users of our website. This helps us provide you with a better user experience when you visit our website and also allows us to optimize our website.

All websites targeting certain parts of the European Union are required to ask for your consent before using or storing non-functional cookies and similar technologies on your computers or mobile devices. This cookie policy gives you clear and complete information about the cookies we use and their purpose.

### **Types of Cookies**

While there are different types of cookies, classified by functionality, origin, or retention period, the legislation mainly distinguishes between functional or technically necessary cookies on the one hand and all other cookies on the other.

The website accessible via [www.mbus.be](http://www.mbus.be) uses the following cookies:

### **Necessary Cookies**

Name	Origin	Type and Purpose	Retention Period
PHPSESSID	mbus.be	HTTP. Session history retention	Duration of session

More information about cookies can also be found at: <http://www.allaboutcookies.org/>

More information about online behavioral advertising and online privacy can be found here:  
<http://www.youronlinechoices.eu/>