



## Privacy Statement for “My CM app”

The Christelijke Mutualiteit (hereinafter: CM) respects your privacy in accordance with the current legislation. CM makes every effort to inform you clearly and transparently about the way in which your personal data is processed.

The Purpose of this Privacy Statement is to tell you in a concise manner how your personal data is processed when using the My CM app.

If you would like to know more about how CM processes your personal data, please refer directly to the [General CM Privacy Statement](#).

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### **1. Data controllers of your data**

Your personal data will be processed:

- L’Alliance Nationale des Mutualités Chrétiennes, with its registered office at Chaussée de Haecht 579, box 40, 1031 Schaerbeek, Belgium, and whose company registration number is 0411.702.543
- Christelijke Mutualiteit Vlaanderen (120), with its registered office at Chaussée de Haecht 579, box 40, 1031 Schaerbeek, Belgium, and whose company registration number is 0874.853.490, to which you are affiliated or which are contacted to process your file;
- La Mutualité Chrétienne (134) with its registered office at Chaussée de Haecht 579, box 40, 1031 Schaerbeek, Belgium, and whose company registration number is 0411.784.794
- Les Sociétés Mutualistes Régionales (SMR) Brussels, with its registered office at Chaussée de Haecht 579, box 40, 1031 Schaerbeek, Belgium, and whose company registration number is 0713.670.669
- Les Sociétés Mutualistes Régionales (SMR) Wallonie with its registered office at Rue de Fernelmont 42, 5020 Champion-Namur, Belgium, and whose company registration number is 0713.671.758



## 2. What personal data is involved?

2.1. CM, the owner and publisher of this My CM app, retains (on a temporary basis) certain items of data that are required for the use of the My CM app. CM stores this data securely.

2.2. The types of data collected are:

<b>Personal data</b>	<ul style="list-style-type: none"><li>• Last name and first name,</li><li>• State register number (unique ID)</li></ul>
<b>Electronic identification data</b>	<ul style="list-style-type: none"><li>• User name (e-mail address),</li><li>• Password,</li><li>• Device type,</li><li>• IP address,</li><li>• OS (operating system)</li><li>• OS software version,</li></ul>
<b>Geographical data</b>	<ul style="list-style-type: none"><li>• Postcode or geographical details with respect to which country (no GPS signal)</li></ul>

## 3. Purposes: what is the personal data processed for?

3.1. Processing this data enables us to track the precise use of the My CM app and to adjust the further development of the My CM app and its underlying systems accordingly. For example, we store your language preference, the individual setting for app messages and the version of the app installation. This data and settings may be viewed after installation via the Settings of the My CM app at right below in ['MORE...'](#)

3.2. Like other services, CM also gathers information about incidents or when something does not function properly on your device. In doing this, we save the unique ID (see above), together with the date and time at which an incident occurs. This enables us to analyse and correct problems that may occur with the software on the device.

3.3. CM may also carry out analyses based on this information, whether or not with the assistance of third parties (*see more about this in point 8 of this policy*). Using these results and analyses, CM is able to enable and improve the structure, navigation and contents of the application in as user-friendly a way as possible. It also provides us with the necessary insight for gearing the messages we send out to match the way the My CM app is actually being used. However, the resulting statistics and reports will not enable CM to work out who a specific user may be.

3.4. CM implemented also the *App Tracking Transparency Framework* (Starting with iOS 14.5, iPadOS 14.5, and tvOS 14.5). CM is able to track data from you as a user or device level identifier that is used to join data from the My-app with data from third parties (including SDKs used in your app) for purposes of advertising, ad measurement or sharing with a data broker or to make analyses. CM will track only data with your explicit consent.

## 4. How long will your data be kept?

4.1. CM respects the principle of storage limitation and will not keep your data relating to the My CM app for any longer than is necessary for the application to operate to optimum effect and for the purposes mentioned above.



4.2. Notwithstanding what is stated in 4.1., CM will also retain your personal data insofar as this personal data is necessary for CM's compliance with its legal obligations and in the context of other activities that are detailed in the [General CM Privacy Statement](#).

## 5. Your rights

5.1. As a user of the My CM app, you have certain rights relating to your personal data, on condition that these do not conflict with the legal obligations or public interest tasks entrusted to CM.

5.2. Depending on the type of processing, the privacy legislation provides the following rights:

- Right of access;
- Right of rectification or modification of your data;
- Right to withdraw your consent ;
- Right not to be subject to solely automated decision-making;
- Right to object;
- Right of erasure;
- Right to restriction of processing;
- Right to data portability

5.3. For more information about these rights invoked by CM, see the [General CM Privacy Statement](#).

## 6. Legal basis

6.1. By installing and using the My CM app, you agree as a user to CM processing the data necessary for use of the My CM app. The legal basis for this is article 6, 1, b) GDPR because the processing is required for the fulfilment of an agreement to which you are a party as a user.

6.2. Other data, such as biometric data (facial recognition, fingerprint) will not be processed by CM, but with your explicit consent , it will be used as an identification mechanism by the OS version of your device, whether Android or iOS (*see point 7*).

6.3. App permissions or login option can be modified or withdrawn at any time via the individual settings on the user's device. This can be done via the menu: ***'MORE...' => 'App permissions' or 'Login options'***.

6.4. As a user, you can delete your my CM account at any time. Of course, only your login data will be deleted and so not the personal data relating to your personal member record. Data held at suppliers or processors will also be deleted, insofar as their privacy policy allows (*see point 7*).

Personal data and its legal basis	
<ul style="list-style-type: none"><li>• Last name and first name,</li><li>• Date of birth,</li><li>• National register number (unique ID)</li><li>• User name (e-mail address),</li><li>• Password,</li><li>• Device type,</li></ul>	Agreement based on article 6, 1, b) GDPR



<ul style="list-style-type: none"> <li>• IP address,</li> <li>• OS (operating system) software version</li> </ul>	
<ul style="list-style-type: none"> <li>• Postcode or geographic data with respect to which country (no GPS signals)</li> </ul>	Agreement based on article 6, 1, b) GDPR or consent on the basis of article 6, 1, a) insofar as the user's agreement is required
<ul style="list-style-type: none"> <li>• Tracking of data in accordance with the App Tracking Transparency Framework</li> </ul>	Consent based on article 6, 1, a) GDPR

## 7. Security for the app/data

- We take appropriate measures to guarantee the security, integrity and availability of your data, taking account of the state of the technology, the scope and context of the processing purposes and the type of personal data involved.
- CM takes appropriate physical, administrative, organisational and technical security measures to protect your data against loss, unauthorised access, unauthorised usage and unauthorised disclosure.
- CM imposes the same security measures contractually on its processors.

## 8. Link to other processors and/or software providers

Android/Google	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
iOS van Apple	<a href="https://www.apple.com/legal/privacy/en-ww/">https://www.apple.com/legal/privacy/en-ww/</a>
Facebook SDK (Software Development Kit)	Android: <a href="https://developers.facebook.com/docs/android">https://developers.facebook.com/docs/android</a> and <a href="https://opensource.facebook.com/legal/privacy/">https://opensource.facebook.com/legal/privacy/</a> iOS: <a href="https://developers.facebook.com/docs/ios">https://developers.facebook.com/docs/ios</a> and <a href="https://opensource.facebook.com/legal/privacy/">https://opensource.facebook.com/legal/privacy/</a>
Firebase SDK	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> and <a href="https://firebase.google.com/docs">https://firebase.google.com/docs</a>
Outsystems	<a href="https://www.outsystems.com/trust/gdpr/">https://www.outsystems.com/trust/gdpr/</a> and <a href="https://www.outsystems.com/legal/terms-of-use/privacy-statement/">https://www.outsystems.com/legal/terms-of-use/privacy-statement/</a>
See also 'Third-party software' in the My CM app	<i>'MORE...' =&gt; 'About this app' =&gt; 'Third-party software'</i>

## 9. Contact

### 9.1. General

If you have a question, comment or enquiry, you can always contact us:

- via the My CM app, under: *"I have a question"*
- via the [online contact form](#) or [request form for your right of access](#);



- by letter to Landsbond der Christelijke Mutualiteiten, Haachtsesteenweg 579, 1031 Schaarbeek, Belgium;
- by telephone to the [contact centre](#) of your regional CM health fund;
- by an [appointment](#) at your regional health fund;
- by visiting your [CM consultant](#).

### 9.2. **Data Protection Officer**

If you find that the channels given above are unable to help you, you can also contact our Data Protection Officer. This can be done:

- by sending a letter to the Landsbond der Christelijke Mutualiteiten, f.a.o. the Data Protection Officer, Haachtsesteenweg 579, 1031 Schaarbeek, Belgium;  
or
- by e-mail to [privacy@cm.be](mailto:privacy@cm.be).

### 9.3. **Data Protection Authority**

In addition to the ability to contact us directly, you can also contact the Data Protection Authority:

- Privacy Protection Commission, Drukpersstraat 35, 1000 Brussels, [gegevensbeschermingsautoriteit contact](#)