

SIHTO Privacy Policy long notice

1. GENERAL PROVISIONS

1.1 Introduction

The protection of your personal data is of particular importance for SIHTO

This Privacy Policy applies to the personal data that we process about you as a natural person when you use our services and/or our products, when you visit our website or when you use our mobile app.

SIHTO NV, a limited liability company (*naamloze vennootschap*) duly organized and existing under the laws of Belgium, with registered office at 9052 Gent, Technologiemark-Zwijnaarde 122, box AA Tower, Belgium, and registered with the Crossroads Bank for Enterprises (Gent, division Gent) under number 0656.997.628 ("Sihto")

is the 'controller' for the processing of your personal data.

1.2 Contact

If you have any questions about this privacy policy or privacy at Sihto NV, you can contact our Data Protection Officer either by mail:

SIHTO NV
DATA PROTECTION OFFICER
TECHNOLOGIEPARK 122

9052 zwijnaarde,

BELGIUM

1.3 Updates

We regularly review our privacy policy and we will update it as needed. We will inform you about significant changes (for example on our website).

2. RIGHT OF CUSTOMERS

You can exercise the following rights by contacting us (See Contact section), in accordance with the conditions laid down in the applicable legislation:

- You have the right to withdraw your consent for the processing of personal data, to the extent that the processing of your personal data was initially based upon your consent.
- You have the right to obtain from us confirmation as to whether or not we process your personal data, and, where that is the case, you have the right to obtain a copy.
- You have the right to obtain the rectification of inaccurate personal data.
- You have the right to have incomplete personal data completed.
- You have the right to erasure of your personal data if one of the following grounds applies:
 - Your personal data are no longer necessary in relation to the purposes for which they were collected or processed;
 - You have objected to the processing for direct marketing;
 - You have objected to the processing which is based on our legitimate interest;
- We are not obliged to comply with your request for erasure in the following cases:
 - We have a legal obligation which requires the processing of your personal data;
 - The processing is necessary for the establishment, exercise or defense of legal claims.

- You have the right to obtain restriction of the processing:
 - If you contest the accuracy of your personal data, for the period we need to verify the accuracy of your personal data.
 - If we no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims.
 - If you have objected to the processing based on our legitimate interests, for the period we need to verify whether your legitimate grounds are valid.
- You have the right to object to any processing for direct marketing.
- You have the right to object to any processing based on our legitimate interest. However, we will continue the processing of your personal data if we can show that we have stronger legitimate grounds.
- You have the right to seek the portability of your personal data processed by automated means, which you have communicated to us.
- You also have the right to lodge a complaint with the supervisory authority in the European member state of your habitual residence, place of work or of the alleged infringement of applicable data protection legislation:
 - In Belgium, the Supervisory Authority is the Data Protection Authority
Drukpersstraat 35
1000 Brussels
 - contact@apd-gba.be
www.privacycommission.be

3. PROCESSING OF PERSONAL DATA

3.1 Why do we process your personal data?

The purposes for which we process your personal data depend on how you enter in contact with us.

A. You surf on our website

We process information about your device and about your use of our website, for the purposes:

- Of information security (to for example ward off cyber-attacks),
- For management of our website (to for example enable you to access the website from your device and to remember your choices),
- For the better understanding of your needs and continuous improvement of our website, and for marketing.

This processing is based upon our legitimate interest. It is in our and your best interest to increase the efficiency of our website and to optimize our products and services.

We refer to our [policy regarding cookies](#) for more information about this.

B. You contact us

We process your personal data in order to answer and manage your request (e.g. request for information, subscription to our newsletter). This processing is based on your consent.

C. You purchase our products or services

We process your personal data for client management in order to provide you our products or services. Without your personal data, we cannot provide you the product or service you have purchased.

We process your personal data for the direct marketing of our products and services, based upon our legitimate interests. We believe that it is important to keep you, as our client, informed about our products

and services. This processing involves compiling a profile. This profile has no effect on you, except to the extent that this processing activity might lead to the enhancement of customer experience and personalized offers, which is an advantage to you. The provision of your personal data for this purpose is not a requirement and you can object to this processing (see chapter "Rights of Customers").

We process your personal data for following up on your solvency, based upon our legitimate interest. It is in our interest to strive for cost optimization (control and minimization) and to protect ourselves against damages. This processing may involve a profiling with the consequence that you may not be able to complete the purchase. The provision of your personal data for this purpose is not a requirement and you can object to this processing (see chapter "Rights of Customers").

We process your personal data for fraud prevention, based upon our legitimate interest. It is in our interest to protect ourselves against material and immaterial damages and to prevent unlawful activities and abuse of our products/services/resources. This processing may involve a profiling with the consequence that you may not be able to complete the purchase. The provision of your personal data for this purpose is not a requirement and you can object to this processing (see chapter "Rights of Customers").

We may aggregate your personal data and process such aggregate data for research and development, based on our legitimate interests (e.g. statistics about sales, market analysis, development of products/services). We believe that research and development can lead to enhancement of customer experience and improvement and innovation of our products/services, which will help the persons concerned by our products/services. This processing may involve compiling a profile. This profiling has no effect on you, except to the extent that this processing activity might lead to enhancement of customer experience, improvement and innovation of our products/services, which is an advantage for you. The provision of your personal data for this purpose is not a requirement and you can object to this processing (see chapter "Rights of Customers").

3.2 With whom do we share your personal data?

We may transfer your personal data to our affiliates and commercial partners and to companies that process personal data in our name and on our behalf (known as 'processors'):

- Service providers in the field of marketing and retail.
- Operators of live help chats,
- Retailers.
- Government agencies and authorities.

3.3 Are your personal data transferred outside the European Economic Area?

Besides these aforementioned transfers of your personal data, we also transfer your personal data to countries outside the European Union as some of our affiliates, commercial partners or processors are established outside the European Union. Each transfer outside the European Union is based on appropriate safeguards (adequacy decision and/or standard data protection clauses of the European Union. You can contact us (see "chapter Contact") in order to obtain more information on the appropriate safeguards that we have taken for these transfers.

3.4 For how long is your personal data retained?

Your personal data is retained for as long as you are in contact with us and as long it is needed as required by law or to ensure the service we provided.