

Privacy Policy

1. WHO WE ARE

“We”, “us” or “our” means Suivo, with its registered office at Prins Boudewijnlaan 41, 2650 Edegem and with company number BE0820.531.116 . We act as controller for the personal data we gather through your use of Suivo System.

This Privacy Policy is solely intended to provide you with information in relation to the processing of personal data through your use of the Suivo System. For our privacy practices in relation to our services, we refer you to the agreement as may be concluded between us.

Your privacy is important to us, so we’ve developed this Privacy Policy that sets out how we collect, disclose, transfer and use (“process”) the personal data that you share with us, and which rights you have. Please take a moment to read through this policy.

If you have any questions, concerns or complaints regarding this Privacy Policy or our processing of your personal data or you wish to submit a request to exercise your rights as set out in article 7, you can contact us:

- (a) Via-mail: to privacy@suivo.com;
- (b) By post: to Prins Boudewijnlaan 41, 2650 Edegem.

This Privacy Policy was revised last on 04/03/2022.

2. HOW WE USE AND COLLECT YOUR PERSONAL DATA

Personal data is defined as any information relating to an identified or identifiable natural person. Identifiable refers to identifiers (such as name, identification number, location data, etc.), that can be used to directly or indirectly identify a natural person.

The personal data we collect, is collected and used for the purposes as listed hereunder:

- a. We process personal data to grant you access to the Suivo System, answer your questions and account management purposes. We will potentially process Customer Database’s personal data that you upload into our system to provide you our services. We do this in our role as processor for the purposes that you, as a user, define. We will never access this data unless this is requested by the user. This data will never be used for any other purposes.
- b. We process your personal data to enforce or exercise any rights that are available to us based on the applicable law, such as use for the establishment, exercise or defense of legal claims. We may also use your personal data to fulfil our obligations as set out by the applicable law.
- c. If you give us your consent, we will use your contact information to send you marketing communication. This consent can be withdrawn at any moment.

The following categories of personal data can be distinguished:

a. Contact data: when you set up your account in the Suivo System: name, last name, e-mail address and company name.

b. Customer Database: When you subscribe to the Suivo services and create your own Suivo database, any information or content you submit or upload into the system is your own, and you control it fully. We will ask for the data category when you upload the data, so we can record this in our register of processing activities.

The legal basis for the processing of your personal data is:

a) Contractual ground, art. 6, (1), b) GDPR: the processing is necessary for the performance of the agreed agreements in the customer/employment contract.

Consent, art. 6, (1), a) GDPR. We have received this unambiguous and explicit consent. You have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that took place before the withdrawal of your consent

3. RETENTION OF YOUR DATA AND DELETION

Your personal data will not be kept longer than necessary to achieve the purposes for which they were collected.

(a) Data for the management of our customer database is kept for 7 years after the end of the agreement or 3 years if no agreement has been concluded;

(b) Data for the Customer Database is kept for as long as necessary for providing the services you subscribed to;

In the event you withdraw your consent, or you object to our use of your personal data, and such objection is successful, we will remove your personal data from our databases. Please note that some data is necessary to perform our Agreement and as such cannot be deleted without ending our Agreement.

However, we are entitled to keep your personal data if this is necessary to comply with our legal obligations, in order to file a legal claim or defend ourselves against a legal claim, or for evidential purposes.

When the retention of the personal data is no longer required, we will destroy or delete it in a secure manner or make it available to you.

4. THIRD PARTY SUPPLIERS

In order to support our operations, we may pass on your personal data to several third party suppliers with whom we have contracted to offer you services.

They help us with various services such as payment processing, web audience analysis, cloud hosting, marketing and communication, etc.

Whenever we share data with these Service Providers, we make sure that they use it in compliance with Data Protection legislation, and that the processing they carry out for us is limited to our specific purpose and covered by a specific data processing contract.

Below is a list of the Service Providers we are currently using, why we use them, and what kind of data we share with them.

Third party supplier	Service	Data
Google Cloud EMEA Ltd	Infrastructure and hosting	Production data from the Customer Database

5. INTERNATIONAL TRANSFERS

We do not transfer and process personal data to countries outside of the European Economic Area or to countries that do not guarantee an adequate level of protection, equivalent to the level guaranteed under the GDPR and this privacy policy.

Hosting Location of the Suivo system: Belgium

6. YOUR RIGHTS

This article lists your principal rights under data protection law. We have tried to summarize them for you in a clear and legible way.

Your rights can be exercised in the Suivo system or via a written request in accordance with article 1 of this Privacy Policy. We will respond to your request without undue delay, but in any event within one month of the receipt of the request. In the event of an extension of the term to respond or in the event we do not take action on your request, we will notify you.

The Customer Database can be managed in the Suivo System where most of the data subject rights can be exercised. For any other request you can contact us via our contact info in accordance with article 1.

The right to access

You have the right to confirmation as to whether or not we process your personal data and, in the event we do so, you have the right to access such personal data, together with certain additional information that you also find listed in this Privacy Policy.

You have the right to receive from us a copy of your personal data we have in our possession, provided that this does not adversely affect the rights and freedoms of others. The first copy will be provided free of charge, but we reserve the right to charge a reasonable fee if you request further copies.

The right to rectification

If the personal data we hold about you is inaccurate or incomplete, you have the right to have this information rectified or, taking into account the purposes of the processing, completed.

The right to erasure (right to be forgotten)

In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- (a) The personal data are no longer needed in relation to the purposes for which they were collected or otherwise processed;
- (b) You withdraw your consent, and no other lawful ground exists;

- (c) The processing is for direct marketing purposes;
- (d) The personal data have been unlawfully processed; or,
- (e) Erasure is necessary for compliance with EU law or Belgian law.

There are certain exclusions to the right to erasure. Those exclusions include where processing is necessary,

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation; or,
- (c) for the establishment, exercise or defense of legal claims.

The right to restrict processing

You have the right to restrict the processing of your personal data (meaning that the personal data may only be stored by us and may only be used for limited purposes), if:

- (a) You contest the accuracy of the personal data (and only for as long as it takes to verify that accuracy);
- (b) The processing is unlawful and you request restriction (as opposed to exercising the right to erasure);
- (c) We no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; or,
- (d) You have objected to processing, pending the verification of that objection.

In addition to our right to store your personal data, we may still otherwise process it but only:

- (a) with your consent;
- (b) for the establishment, exercise or defense of legal claims;
- (c) for the protection of the rights of another natural or legal person; or,
- (d) for reasons of important public interest.

We will inform you before we lift the restriction of processing.

The right to data portability

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

You also have the right to have your personal data transferred directly to another company, if this is technically possible, and/or to store your personal data for further personal use on a private device.

The right to object to processing

You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

(a) The performance of a task carried out in the public interest or in the exercise of any official authority vested in us;

(b) The purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

The right to complain to a supervisory authority

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. In Belgium, you can submit a complaint to the Authority for the protection of personal data (Data Protection Authority), Drukpersstraat 35, 1000 Brussel or via contact@apd-gba.be.

7. MISCELLANEOUS

This privacy policy is without prejudice to our right to take further actions vis-à-vis certain users of our products and services, based on an agreement, the law, regulations, etc and we implement Data Privacy, Data Protection and Data Security by design and by default where and whenever possible.

8. UPDATES

We may make changes to this privacy policy from time to time, including as part of the GDPR. The latest version of our privacy policy is always available in the Suivo Application.