

Privacy Statement

This is a translation. In the event of a discrepancy, the Dutch version prevails and is leading.

Article 1 General principles

We attach great importance to the protection of your personal data and your privacy at Connect Solutions.

Connect Solutions undertakes to adhere to the General Data Protection Regulation (2016/679).

This privacy statement provides you with detailed information regarding the protection of your personal data in relation to the DIGICONNECT platform and the related services, in particular the qualified trust service Aangetekende.email, managed by Connect Solutions with office at 3550 Heusden-Zolder, Zandstraat 187.

The purpose of this privacy statement is to inform you about the nature of the personal data we process, the purposes for which we process and share this data. We also share the storage periods for these personal data and how you can exercise your rights.

You are requested to read this privacy statement carefully and to take note of the contents. It is not excluded that the content of this privacy statement may change, so we ask you to check this on a regular basis so that you are kept informed of the changes made. When CONNECT SOLUTIONS implements changes or additions to the Privacy Statement, it changes the date of the "latest update" at the bottom of the document.

Article 2 Connect Solutions as Data Controller

Connect Solutions processes personal data with regard to its users who register on the DIGICONNECT platform and the related services. Connect Solutions acts as the Data Controller.

2.1 What personal data do we use about you?

We process the following categories of personal data of the users of the platform DIGICONNECT and the related services:

- Identification data: name, first name, eID data and public certificates of the eID;
- Login details, username, password;
- Contact details: postal address, e-mail address and mobile phone number;
Private postal address is only maintained in the case of a private account and is not applicable if you are a user in function of a company account.
- Transaction details:
Sender, addressee, the content of the message and any attached documents, time of delivery and receipt;
- Payment data: purchase and consumption of credits, invoicing.

In addition, the following data is logged for each use of the services linked to the DIGICONNECT platform:

- The IP address that you are assigned at the time of the connection;
- Date and time of access to the platform;
- Language selection;
- Used browser and operating system.

2.2 Specific cases of collection of personal data

Within the framework of a business account, we collect and use the above personal information from you in function of your powers within the company account.

This personal data is obtained directly from you from the moment that you register as a user within the company account, or is obtained from an administrator of the company account from the moment that administrator adds you as a user on the company account.

The use of this personal data is necessary for authentication for you as being a user of the company account and will not be used for any other purposes.

2.3 What are the goals and the processing grounds for your personal data?

The personal data will not be used for any other purposes than those that are necessary in the context of the services connected to the DIGICONNECT platform.

Connect Solutions will treat the personal data as confidential information.

We collect and use your personal data only if at least one of the following conditions is met:

1. Permission

When you create an account, you give Connect Solutions permission to process your personal data in the context of the services connected to the DIGICONNECT platform.

2. Agreement

It is necessary to process your data within the framework of the agreement to use the services of Connect Solutions.

3. Justified interest

We use your personal data to identify you and, more specifically, to provide our qualified trusted service Aangetekende.email with a legally conclusive framework, where the identification of sender and addressee is a necessity to comply with the eIDAS regulation and to provide you with the necessary guarantees as a qualified trust service.

Connect Solutions confirms to fulfill its obligations regarding security and protection of personal data in accordance with the General Data Protection Regulation.

2.4 With whom do we share your personal data?

To be able to fulfill the goals of the qualified trust service Aangetekende.email, we share personal data with other users of the service and with your correspondents on the service. These users / correspondents can be both natural and legal persons.

In case you are a user of a company account, we do not share personal data with other users / correspondents.

In case of a private account we share your email address, name and first name with other users of the service and your correspondents.

Connect Solutions makes every effort to protect your privacy. Of course, this is only possible if you yourself take the necessary measures to protect your privacy. For example: Never give your password or other login details to third parties.

We also share your personal data with third parties if such a transfer is imposed by or pursuant to a law, decree or ordinance or judicial decision.

Your personal data will never be processed by an institution or company that is located outside the European Union.

2.5 Retention period of your personal data?

Connect Solutions does not store personal data longer than necessary for the purpose for which it was provided or required by law.

In the case of a private account

Your personal data will be stored for up to 45 days after cancellation of your account.

In the case of a company account

- You are an administrator.

If you wish the company account to remain active, you will have to be replaced by another administrator before you can delete yourself as sole administrator. From the moment that another administrator is assigned to the company account, you will be able to delete your user account and your personal data will be deleted.

If 2 or more administrators are already connected to the company account, your personal data will immediately be deleted when your user account is deleted.

If you completely remove the company account, your personal data will be deleted with a maximum of 45 days after cancellation of the company account.

- You are a “normal” user.

If you are added to a company account as a user, your personal data will be retained during the period that you are a user.

From the moment that the administrator of the company account removes you as a user, your personal data will also be removed by this.

Caution! If you are still registered on the platform in function of another account, either a private account or a company account, your personal data will still be stored in function of the other accounts.

Your personal data may still occur in transaction loggings during 24 months.

2.6 What rights do you have as a user and how can you exercise this?

Insight

You can obtain information about the processing of your personal data by consulting it in your account. If you require more detailed information about the processing of your personal data, you can request them in writing.

Improvement

You can always update the personal data in your account if they are incorrect or incomplete.

Clear / forget / Right to limit

You may at any time delete your personal data, request a restriction on the processing of your personal data or withdraw your consent to the processing of your personal data.

Please note that the deadline for deleting your personal data is determined in accordance with article 6.

If you want to execute the above rights, this may result in you no longer being able to use the services of the DIGICONNECT platform.

Portability of data

You have the right to transfer the personal data you have provided to us to a third party, as far as this is technically possible.

Article 3 Connect Solutions as Data Processor

Connect Solutions acts as a processor of personal data entrusted to Connect Solutions by the Sender in the context of a delivery to an addressee who is not registered on the DIGICONNECT platform.

The Sender, who is a user of the DIGICONNECT platform, acts as the data controller of this personal data.

The personal data made available by the Sender are the following:

- E-mail address of the addressee;
- GSM number of the addressee;
- Name and first name(s) of the addressee;
- Postal address of the addressee;
- Addressee's language;
- Optional additional data to identify the addressee.

With regard to this personal data, the Sender will have the rights and obligations of a data controller as described in the General Data Protection Regulation (2016/679).

The e-mail address and GSM number of the addressee are used by Connect Solutions to inform the addressee that a registered mail is ready to be picked up.

The e-mail address and GSM number of the addressee are also used by Connect Solutions to identify the addressee as the intended recipient. To this end, Connect Solutions will send one-time valid codes (TOTP) to the e-mail address and GSM number of the addressee.

The name, first name and postal address of the addressee are used by Connect Solutions to send the mail by post to the addressee if it has not been collected in electronic form.

The language of the addressee is used by Connect Solutions to take care of the communication with the addressee in the specified language.

In the performance of its task as data processor, Connect Solutions will commit itself:

- Not to use the personal data entrusted by the Sender to Connect Solutions for any other purposes than for the delivery of the concerned mail either in electronic form or in physical form.
- Not to process personal data outside the EU.
- That the persons authorized to process the personal data respect confidentiality and that they only have access to the personal data if necessary for the performance of Connect Solutions' tasks.
- Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, to take appropriate technical, physical and organizational measures to ensure a level of security appropriate to the risk and to protect the personal data against loss, alteration or unauthorized disclosure or access.
- To assist the Sender, taking into account the nature of processing and the information available to Connect Solutions, for the fulfilment of the Sender's obligation to respond to requests for exercising

the data subject's rights laid down in Chapter III (GDPR), and for the fulfilment of the Sender's obligations pursuant to Articles 32 to 36 (GDPR).

- To make, after written request, all necessary information available to the Sender to demonstrate compliance with the obligations laid down in this article.
- Not to employ another processor than those mentioned in attachment 1 without informing the Sender. In the event that another processor is hired, Connect Solutions will impose the same data protection obligations on this processor as described in this article. If this processor fails to fulfill its data protection obligations, Connect Solutions remains fully liable to the Sender.
- To comply with its duty to report in the event of breaches cf. Article 19.2 of Regulation (EU) No. 910/2014 (eIDAS regulation).

In addition to the personal data entrusted to Connect Solutions by the sender, Connect Solutions maintains the following transactional and personal data as data controller:

- Date and time of collection of the message in electronic form;
- The IP address;
- Date and time of access to the platform;
- The used browser, operating system;
- Identification data provided by itsme to the service when the addressee identifies him/herself through itsme when collecting the message, including the national register number;
- Identification data of the eID (public certificate) when the addressee identifies him/herself with eID when collecting the message;

The abovementioned transactional and personal data is collected by us for the operation of the service whereby proof of collection and identification of the collector need to be maintained as evidence.

The personal data and transactional data are stored in transaction loggings for 24 months after delivery of the mail.

Under certain conditions you can view your personal data or if necessary have them corrected or deleted, you can limit their processing or request their transferability via a dated and signed written request to the contact address mentioned in Article 4

Article 4 How can you contact us?

You can also contact us if you have a complaint about how we collect, store or use your personal data. We will make every effort to resolve complaints, but if you are not satisfied with our response, you can contact the supervisory authority.

Please send your written question or complaint to:

Connect Solutions

Adres: Zandstraat 187, 3550 Heusden-Zolder

E-mail: privacy@connect-solutions.be

We may ask you for additional information to verify your identity before we handle your request or complaint. If you contact us on behalf of someone else, we may also request additional information to ensure that you are authorized to submit such a request or complaint.

Last update: 01-01-2022

Attachment 1: Subprocessors

Subprocessors	Purpose
Flowmailer, Van Nelleweg 1, 3044 BC Rotterdam, Nederland (www.flowmailer.com)	E-mail and SMS service provider

Last update: 01-01-2022