

PRIVACY POLICY

Version of June 2023

We understand that your trust in us, is Wisemen's (hereinafter referred to as "**WISEMEN**", "**we**" or "**us**") most important asset. As such, your privacy is essential to us.

This privacy policy (hereinafter referred to as "**Privacy Policy**") is applicable, inter alia, to **(i)** our website <https://wisemen.digital/> (hereinafter referred to as the "Website") and **(ii)** all (commercial) relations between WISEMEN and its customers, prospects and business partners.

This Privacy Policy includes information about the personal data collected by WISEMEN, as well as the manner in which WISEMEN uses and processes this personal data.

WISEMEN wishes to emphasize that it always attempts to act in accordance with **(i)** the Belgian Privacy Law of 30 July 2018 regarding the protection of natural persons in relation to the processing of personal data, **(ii)** the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC, and **(iii)** other applicable data protection legislation.

Visiting the Website, subscribing to the newsletter, making use of the services and/or any other communication with WISEMEN implies your explicit approval (through disclosure of your personal information or opt-in) of the Privacy Policy and consequently how we collect, use and process your personal data.

Please read this Privacy Policy in conjunction with WISEMEN's legal disclaimer and cookie policy.

I. The data controller

The data controller of the processing activities is WISEMEN BV, with its registered office at Watertorenstraat 2, 3590 Diepenbeek, and with company number 0503.920.245, VAT BE 0503.920.245. The contact details of WISEMEN can be found under Article X of this Privacy Policy.

II. The processing activities of WISEMEN

A. General

How does WISEMEN process your personal data?

WISEMEN may use your personal data for the following purposes:

- ✓ Performance of the agreement with WISEMEN (incl. the follow-up thereof)
- ✓ Drawing up a quote and/or issuing invoices
- ✓ Providing support/assistance
- ✓ Responding to questions (whether or not submitted via contact form)
- ✓ Optimising the quality, management and content of the Website
- ✓ Sending newsletters
- ✓ Creating statistics

- ✓ Optimizing the customer experience on the Website
- ✓ Use of cookies, pixel tags and other technologies, as set out in the Cookie Policy on the Website
- ✓ As part of any other (commercial) relationship entered into with WISEMEN

All personal data, collected by WISEMEN, are thus expressly and voluntarily provided by you.

Providing certain personal data is (sometimes) a requirement to be able to enjoy certain services (e.g. to gain access to certain parts of the Website, to subscribe to newsletters, to participate in certain activities and events, delivery of your online quote). In this respect, it shall be indicated which data must be provided mandatory and which data is optional.

What is the legal basis for processing your personal data?

Processing takes place on the following legal grounds, as the case may be:

- ✓ You have given consent to the processing of your personal data for one or more specific purposes
 - Marketing purposes such as sending newsletters
 - The use of cookies, pixel tags and other technologies (except for strictly necessary cookies)
- ✓ Processing is necessary for the performance of the agreement with WISEMEN or in order to take steps at your request prior to entering into an agreement
 - Performance of the agreement with WISEMEN (incl. follow-up)
 - Sending of quotes and/or issuing invoices
 - Providing support/assistance
- ✓ Processing is necessary for compliance with a legal obligation to which WISEMEN is subject
 - Invoicing
- ✓ Processing is necessary in order to protect your vital interests or those of another natural person
- ✓ Processing is necessary for the performance of a task carried out in the public interest
- ✓ Processing is necessary for the purposes of the legitimate interests pursued by WISEMEN or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child)
 - Responding to questions (whether or not received through the contact form): at your request, WISEMEN will answer questions or provide information through various channels (including e-mail, contact form and social media)
 - Marketing towards existing customers or leads: WISEMEN respects the applicable regulations, whereby direct marketing e-mails may only be sent if there is an existing customer relationship regarding similar products or services of WISEMEN. You will always have the possibility to unsubscribe to such marketing activity.
 - The use of strictly necessary and functional cookies on the Website: the use of these cookies is necessary for the functioning of the Website for the purpose for which the visitor visits the Website

In case the legal ground for processing of personal data by WISEMEN is legitimate interest, WISEMEN will always **(i)** assess the necessity of the processing activity in relation to the purpose of the processing (proportionality test), and **(ii)** assess whether

you, the data subject, could reasonably expect the specific processing activity to take place, in order to evaluate the possible effects of the processing activity on your fundamental rights and freedoms.

B. Processing activities for use of the Website

METHOD OF COLLECTION	PERSONAL DATA	PURPOSE	LEGAL GROUND	RETENTION PERIOD
Fill in the contact form	Surname, first name, e-mail address, telephone/mobile phone number, purpose of the question,...	Answering questions	Legitimate interest	Duration necessary to answer the question
Cookies <i>For more information we refer to the Cookie Policy as available on the Website of WISEMEN</i>	IP address, click behaviour and input,...	Optimising and personalising your browsing experience.	Legitimate interest for necessary cookies. Explicit consent for non-essential cookies (consent can be withdrawn at any time).	Dependent on type of cookie.
Subscribing to the newsletter	Name, first name, e-mail address	Informing you of news about our operations or events	Legitimate interest for existing customers, and explicit consent for others.	Immediately after the person concerned has unsubscribed or 1 year after the person no longer opens a newsletter.

WISEMEN also collects certain user and device data when using the Website. This information is anonymous when it does not reveal your identity and may not constitute processing of personal data. Examples of this type of user and device data include information collected through cookies, pixel tags and other technologies. More information about the collection of data via cookies can be found in WISEMEN's Cookie Policy.

C. Other processing activities per category

METHOD OF COLLECTION	PERSONAL DATA	PURPOSE	LEGAL GROUND	RETENTION PERIOD
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HR-operations (job interviews)	First name, last name, address, e-mail, mobile phone number, telephone number, date of birth, place of birth, nationality, gender, language, leisure activities and interests, marital status, academic curriculum, professional qualification, previous employer's salary, work permit, current job, entire career, work organisation, training for the job	HR (via Recrui-tee)	Legitimate interest	Recruitment reserve, maximum 1 year. This period may be longer in the case of a specialised profile that is more difficult to find (maximum 2 years).
Finance (invoicing & payment reminders, registered mail)	Name, first name, company name, address, e-mail address, telephone number, bank account number, payment details, payment history	Invoicing	Execution of agreement	8 years (the legal minimum retention period is 7 years)
Operations (quotation procedure, customer acquisition, customer conversion, performance of customer contract, interaction with suppliers & partners, handling of rights of those involved, quality controls, ...)	Name, first name, company name, e-mail address, mobile number, address, bank details and other project-specific data.	Operations	Execution of agreement (customer contracts, quality controls, ...) Remaining: legitimate interest	<u>Execution of contract:</u> The duration of the customer relationship + 6 months administrative period <u>Justified interest:</u> Until the processing purposes are achieved
IT-operations (project work, internal server/backups, chatbot, platform work, IT security, customer inbox)	Name, first name, profession, position, company name, company address, e-mail addresses, customer number, IP address, user account, click behaviour, other project-specific data	IT-operations	Execution of the agreement	For the duration of the customer relationship + 6 months administrative period <u>Server & back-up data:</u> max. 1 month

				<u>Chatbot</u> : For the duration to answer the question <u>IT security</u> : for the duration of the incident /investigation
Sales & Marketing (Customer acquisition, customer management, customer inbox/customer portal, event mailings, CRM management, customer satisfaction)	Name, first name, profession, function, company name, company address, e-mail addresses, direct marketing preferences, customer number, IP address, user account, click behaviour, other project-specific data, cookies	Sales & marketing activities	Execution of the Agreement: customer management Legitimate interest: marketing mailings for existing customers / purely informational emails Explicit consent: marketing mailings for non-existing customers	For the duration of the customer relationship + 6 months administrative period CRM management: as long as permission is not withdrawn/opted out, justified interest: 10 years (average customer relationship)

III. With whom is your personal data shared?

WISEMEN shall not disclose your personal data to third parties, unless it is necessary in the context of performing the agreement and optimisation thereof. In this respect, your personal data may be disclosed to software providers, cloud partners and service providers.

If it is necessary that WISEMEN discloses your personal data to third parties, the third party concerned is required to use your personal data in accordance with the provisions of this Privacy Policy.

Notwithstanding the foregoing, it is however possible that WISEMEN discloses your personal data:

- ✓ To the competent authorities **(i)** if WISEMEN is obliged to do so under the law or under legal or future legal proceedings and **(ii)** to safeguard and defend our rights
- ✓ If WISEMEN, or the majority of its assets, are taken over by a third party, in which case your personal data – which WISEMEN has collected – shall be one of the transferred assets.

In all other cases, WISEMEN will not sell, hire out or pass on your personal data to third parties, except when it **(i)** has obtained your permission to this end and **(ii)** has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

IV. Cross-border processing of personal data

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer / processing agreement, which shall contain **(i)** the standard contractual clauses, as referred to in the 'European Commission decision of 4 June 2021 (Decision 2021/915)', or **(ii)** any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

V. How long will your personal data be stored?

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, WISEMEN shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Policy under 'Use of personal data'.

VI. What are your privacy rights?

In light of the processing of your personal data, you enjoy the following privacy rights:

- ✓ Right of access to your personal data
 - The data subject shall at all times have the right to access and inspect the personal data processed by the company. The company will provide a copy of this personal data, if the data subject so requests.
- ✓ Right to rectification, completion or update of your personal data
 - The data subject shall always have the right to have inaccurate, incomplete, inappropriate or outdated personal data deleted or corrected.
- ✓ Right to delete your personal data ('right to be forgotten')
 - WISEMEN wishes to point out that in this context certain services will no longer be accessible and/or can no longer be provided if you delete resp. request deletion of certain required personal data.
- ✓ Right to limit the processing of your personal data
 - The data subject has the right to limit data processing if:
 - He disputes the accuracy of the data for a period of time that allows the company to verify the accuracy
 - The processing is unlawful and he opposes the erasure of the personal data and instead requests restriction of their use
 - The company no longer needs the personal data of the individual for the processing purposes, but the data subject still needs them for the establishment, exercise or substantiation of a legal claim
 - He has objected to a processing operation, pending the answer to the question of whether his objection is well-founded
- ✓ Right to transferability of your personal data
 - The data subject has the right to receive the personal data processed by the company in a structured, accessible and digital format in order to save it for personal use or reuse, or to transfer this personal data directly to another data controller. This right applies as far as this is technically possible for the data controller.
- ✓ Right to object/oppose to the processing of your personal data
 - The data subject always has the right to object to the processing for reasons

relating to his specific situation.

- o The data controller will immediately cease processing the personal data, unless he demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subjects or which are connected with the establishment, exercise of substantiation of a legal claim.

If you wish to invoke your privacy rights, please contact legal@appwise.be.

In principle, you can exercise these rights free of charge via the above-mentioned form.

If you no longer wish to receive newsletters or information about the products of WISEMEN, you can unsubscribe at any time by clicking the "unsubscribe" button underneath each of WISEMEN's emails.

VII. Security of personal data

WISEMEN undertakes to take reasonable, physical, technological and organisational precautions in order to avoid **(i)** unauthorised access to your personal information, and **(ii)** loss, abuse or alteration of your personal data.

WISEMEN shall store all personal data, which it has collected onsite or in the cloud with data centres in the EU.

Notwithstanding WISEMEN's security policy, the checks it carries out and the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, WISEMEN is, in this context, not in a position to guarantee absolute security.

VIII. Update Privacy Policy

WISEMEN is entitled to update this Privacy Policy by posting a new version on the Website. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Policy, to make sure that you are aware of any changes.

IX. References to other websites

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. WISEMEN does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

X. Contact WISEMEN

If you have questions and/or remarks about this Privacy Policy or the manner in which WISEMEN collects, uses and/or processes your personal data, please contact us:

✓ Via e-mail: legal@appwise.be

of

✓ Via post: Watertorenstraat 2, 3590 Diepenbeek

In case you are not satisfied with the way WISEMEN handled your questions and/or remarks or have any complaints about the way WISEMEN collects, uses and and/or processes your personal data, note that you have the right to lodge a complaint with the Data Protection Authority:

- ✓ Data Protection Authority (Gegevensbeschermingsautoriteit)
Drukpersstraat 35, 1000 Brussel
Tel: +32 (0)2 274 48 00
E-mail: contact@apd-gba.be