

## **GENERAL**

Effective Date: September 1, 2022

KNTXT BV (“us”, “we”, or “our”) operates the <https://www.kntxt.be> website and the KNTXT mobile applications (collectively, the “Services”).

This page informs you of our policies and practices regarding the collection, use and disclosure of information which personally identifies you or on the basis of which you can be identified (“Personal Information”) when you use our Services or when you enter into contact or relation with us for any purpose whatsoever (the “Privacy Policy”). We will not use or share your information with anyone except as described in this Privacy Policy. We use your Personal Information only as described in this Privacy Policy. By using the Services, you agree to the collection and use of your Personal Information in accordance with this Privacy Policy.

### **Information collection and use; Personal information**

We may ask you to provide us, or third parties may provide us with certain Personal Information that can be used to contact or identify you. Personal Information may include, but is not limited to, your name, postal address, email address, mobile number, log data, location information and employer as well as any other information that you may provide us with. We collect and process Personal Information for the purpose of providing the Services, responding to your requests/inquiries, servicing your purchase orders, improving our Services, communicating with you about our Services, discounts, and promotions, managing our relationship in general, conducting our internal business administration and any other purposes related thereto. We will never process Personal Information if this is not necessary for the intended purpose.

### **How long we keep your personal information**

How long we keep information we collect about you depends on the type of information, as described in further detail below. In general, Personal Information is only kept for the period necessary and appropriate for the purposes for which it is collected and processed or for legal, accounting and/or tax reasons. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives) or if we have the legal right or obligation to retain Personal Information (for example, in relation to the defense of any potential, ongoing or anticipated legal claims), then we will securely store your information and isolate it from any further use until deletion is possible.

#### *Account Information*

We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, it will be anonymized and used to uncover collective insights about the use of our Services, not to specifically analyse personal characteristics about you.

#### *Managed Accounts*

If the Services are made available to you through an organisation (e.g., your employer), we retain your information as long as required by your employer under our agreement with your employer as required by the administrator of your account. If your account is deactivated, your information and conversations you may have had and actions you may have taken on the Services will remain in order to allow your team members to make full use of the Services.

#### *Marketing Information*

If you have elected to receive marketing or promotional emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services. Every marketing email we send will provide you with the option to opt out of receiving future emails.

## **Accessing and Correcting Your Personal Information**

We acknowledge individuals' rights to access their personal information. You may access, update, correct or have removed from our systems and records the Personal Information you provided to us by emailing a request to [privacy@kntxt.be](mailto:privacy@kntxt.be) or contacting us by telephone or postal mail as further specified in the How to Contact Us clause of this Privacy Policy. To protect your privacy and security, we will also take reasonable steps to verify your identity before updating or removing your information.

## **Information Automatically Collected Directly from You**

We collect information about you automatically when you use the Services.

### *Log Data*

We collect information that your browser sends whenever you visit our website or use our Services ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we use third party services such as Google Tag Manager that collect, monitor and analyze this type of information in order to increase our Services' functionality. These third-party service providers have their own privacy policies addressing how they use such information. When you access the Services by or through a mobile device, we collect certain information automatically, including the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, and your general location information as described further below.

### *Location Information*

We use and store information about your general location. We use this information to provide features of our Services and to improve and customize our Services.

### *Cookies*

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve our Services. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The "Help" feature on most browsers provides information on how to accept cookies, disable cookies or to notify you when receiving a new cookie. If you do not accept cookies, you may not be able to use some features of our Services and we recommend that you leave them turned on. For the cookie policy, please refer to: <https://admin.typeform.com/to/dwk6gt/>

### *Do Not Track Disclosure*

We support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the "Preferences" or "Settings" page of your web browser.

## **Information Collected from Other Sources**

We will enrich your Personal Information with additional Personal Information received from publicly accessible sources. We may also receive your information from services you integrate with KNTXT, from other users of the Services of KNTXT, or from our partners.

### *Integrations*

You may enhance the Services by enabling KNTXT integrations with third-party products. If you provide third-party account credentials to us, you understand some content and/or information in those accounts ("Third Party Account Information") will be transmitted into your account with us, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy.

Further, KNTXT software may request permissions to take actions on your behalf using your third-party account credentials.

For example, if you choose to integrate KNTXT Services with your Google Mail inbox, KNTXT software will request authority to display advertisements of Google in your inbox. We will never be able to see your incoming messages or send emails on your behalf.

#### *Other Users of the Services*

Other users of our Services may provide information about you when they use the Services. For example, we receive your email address from other Service users when they provide it in order to invite you to the Services.

#### *Partners*

We work with partners who may market, sell, or support our Services. These partners may provide us your Personal Information so that we can contact you. We also may receive your Personal Information from advertising, market research, or data enrichment partners with whom we engage to identify prospective customers.

We do this in order to provide you with the most relevant content across all of our Services.

#### **Service Providers who may Receive Your Personal Information**

We may employ third-party companies and individuals (our “agents”) to facilitate our Services, to provide the Services on our behalf, to perform complementary services and/or to assist us in analyzing how our Services are used. Examples may include storing data, delivering messages, processing credit card payments, analyzing data to improve the way we work, providing marketing assistance to our partners, managing our agreements with you, supplementing the information you provide us in order to provide you with better service, and providing customer service. We do not transfer data to non-agent third parties. These third parties have access to your Personal Information only to perform specific tasks on our behalf and are under written obligation not to disclose or use your Personal Information for any purpose other than those disclosed in this Privacy Policy.

We will only disclose Personal Information when we are required to do so in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

#### **Communications; Your options**

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email or message we send, or by emailing [privacy@kntxt.be](mailto:privacy@kntxt.be).

#### **Security of Personal Information**

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure. However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

#### **International Transfer of Personal Information**

Your Personal Information may be transferred to — and maintained on — computers located outside of your country, province, state, city or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. If you are located outside the European Union and choose to provide Personal Information to us, please note that we transfer Personal Information to the European Union and process it there pursuant to the European data protection laws.

## **Links To Other Sites**

Our Services may contain links to other websites or online locations that are not operated or controlled by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site or location you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **Children's Privacy**

Only persons who are age 18 or older have permission to access our Services. Our Services are not intended to be used by anyone under the age of 13 ("Children"). We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you learn that your Children have provided us with Personal Information, please contact us by emailing [privacy@kntxt.be](mailto:privacy@kntxt.be). If we become aware that we have collected Personal Information from a child under age 13 without verification of parental consent, we take steps to remove that information from our servers immediately.

## **Processing principles**

As further specified in this Privacy Policy, we will maintain compliance with the following practices:

### *Notice*

When we collect your Personal Information, we'll give you timely and appropriate notice describing what Personal Information we're collecting, how we'll use it, and the types of third parties with whom we may share it. This Privacy Policy serves as such notice, and any changes to our collection, use or disclosure of your Personal Information will be reflected in revisions to the Privacy Policy posted on our website.

### *Choice*

As established and described in this Privacy Policy, we'll give you choices about the ways we use and share your Personal Information, and we'll respect the choices you make.

### *Accountability for Onward Transfer*

If we transfer your Personal Information to another country, we may remain liable and will take appropriate measures to protect your privacy and the Personal Information we transfer.

### *Security*

We'll take appropriate physical, technical, and organizational measures to protect your Personal Information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.

### *Data Integrity and Purpose Limitation*

We'll collect only as much Personal Information as we need for specific, identified purposes, and we won't use it for other purposes without obtaining your consent. We'll take appropriate steps to make sure the Personal Information in our records is accurate.

### *Access*

If you wish to confirm the accuracy of your Personal Information or have it removed from our systems and records, you may contact us at the email address, telephone number or postal address provided in the How to Contact Us clause of this Privacy Policy.

### *Recourse, Enforcement and Liability*

We'll regularly review our continued adherence to these privacy obligations, and we'll provide and maintain the independent mechanism specified in this Privacy Policy as a way to resolve complaints about our privacy practices.

Further, we acknowledge our potential liability for misuse of your Personal Information by us or our third-party service providers, as further set forth in this Privacy Policy.

### **For EU Users**

This section applies only to Users located in the European Union.

### **Contact Information for the Data Controller**

This paragraph pertains only to individuals for whom KNTXT is a "controller" within the meaning of [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation – GDPR\)](#)

Controller of your Personal Information:

*KNTXT BV*

*Onze-Lieve-Vrouw van Vaakstraat 40 / G03*

*1000 Brussels*

*Belgium*

*Phone: +32 486 06 34 91*

*Email: [GDPR@kntxt.be](mailto:GDPR@kntxt.be)*

*Data Protection Officer:*

*Alexander Vandriessche*

*Onze-Lieve-Vrouw van Vaakstraat 40 / G03*

*1000 Brussels*

*Belgium*

*Phone: +32 486 06 34 91*

### *Legal Bases for Processing EU Users' Personal Information*

We only process your information when we have the legal basis to do so. That is, we will only process your Personal Information when:

- We need it to provide you the Services or for any other purpose outlined in this Privacy Policy;
- You give us consent for a specific purpose; or
- It satisfies KNTXT's legitimate interests (which are not overridden by your data protection interests), such as for improving, marketing, and promoting the Services and protecting our legal rights;
- We need to process your data to comply with our legal obligations.

### *Transfer of EU Users' Personal Information Outside the EU*

We may transfer your Personal Information to KNTXT-affiliated entities in third parties in the United States or other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we transfer Personal Information of customers in the European Economic Area or Switzerland to any such country, we make use of the European Commission-approved standard contractual data protection clauses, binding corporate rules, or other appropriate legal mechanisms to safeguard the transfer.

### *EU Users' Rights to Control Personal Information*

You have control over your Personal Information. Below are the rights you have and the steps you can take to exercise them. Please note that your rights may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your employer are permitted by law or have compelling legitimate interests to keep, it may take time for us to investigate your request. If you believe that we are not respecting your rights with regard to your Personal Information, you may lodge a complaint with your local supervisory authority.

### *Right to Access*

You have a right to request a copy of the Personal Information that KNTXT holds. To request this information, please email us at [privacy@kntxt.be](mailto:privacy@kntxt.be).

### *Right to Rectification*

If you believe that any Personal Information that KNTXT holds is incorrect, you have the right to correct that information. You can change your KNTXT account information on the "Settings" page, and if you have any further concerns regarding the accuracy of your information, please email us at [privacy@kntxt.be](mailto:privacy@kntxt.be).

### *Right to Erasure, Restriction, or Objection to Processing*

If you believe we do not have the right to process your information or you object to our processing for a particular purpose, or if you want us to erase your Personal Information altogether, please email us at [privacy@kntxt.be](mailto:privacy@kntxt.be).

### *Right to Withdraw Consent*

If you gave us consent to process your Personal Information for a particular purpose, you have the right to withdraw that consent by emailing us at [privacy@kntxt.be](mailto:privacy@kntxt.be). Your withdrawal of consent does not affect the lawfulness of our processing of your Personal Information prior to the withdrawal.

### *Data Portability*

You have the right to obtain the Personal Information that you have directly submitted to KNTXT in a format you can transfer to another service provider. If you want to exercise this right, please email us at [privacy@kntxt.be](mailto:privacy@kntxt.be).

## **Changes to This Privacy Policy**

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Services after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## **How to Contact Us**

If you have any questions or concerns about this Privacy Policy, please contact us at:

*KNTXT BV*

*Onze-Lieve-Vrouw van Vaakstraat 40 / G03*

*1000 Brussels*

*Belgium*

*Phone: +32 486 06 34 91*

*Email: [privacy@kntxt.be](mailto:privacy@kntxt.be)*