

# Connus Privacy Policy

*Last updated: 14 april 2023*

This Privacy Policy governs the processing of your personal data by Connus, a private company registered in the Belgian Crossroads Bank for Enterprises under number 0737.854.155, with registered offices at Oude Houtlei 14, 9000 Gent, Belgium (hereinafter referred to as “**Connus**”, “**we**”, “**us**” or “**our**”).

The privacy and security of your (hereinafter referred to as “**you**” or “**your**”) personal data are very important to us and we will only collect and process personal data in accordance with the provisions of this Privacy Policy.

The purpose of this Privacy Policy is to specify which categories of personal data we collect through our various business activities such as our website <https://www.connus.app/>, our mobile application Connus, our web application <https://platform.connus.app/>, subdomains, other applications, tools, communication, including emails and in particular in relation to the services we provide (hereinafter collectively referred to as “services”). We furthermore aim to give you a comprehensive view on the purposes for which we process your personal data and which rights you may exercise in that regard.

Please find the information you are searching for by clicking the referral links below.

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## **Article 1      General information**

Our Privacy Policy categorises the personal data we collect and explains how such data may be processed. We furthermore set out whether or not the personal data will be disclosed to third parties and the restrictions and safeguards to which we subject such transfers. To the extent desirable, the Privacy Policy also sets out the different measures we have implemented in order to safeguard the security and confidentiality of the personal data we may collect and process.

We may receive your personal data directly from you, via our [website, web application and/or mobile application](#), its subdomains and directories (collectively referred to as the “**Website**”), any other means relating to information or communication technology, including emails and voice calls, or via any in-person interactions we might engage in. We may additionally receive your personal data from third-party sources, as set out below.

For the purpose of this Privacy Policy, we are to be considered the controller of your personal data. This means that the applicable data privacy legislation imposes certain obligations on us. This

legislation includes in particular, the Belgian Act of 30 July 2018 on the protection of natural persons in relation to the processing of personal data, the Act of June 13th 2005 on the electronic communication, the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016), including future adaptations and revisions of the previous (hereinafter collectively referred to as the “**Applicable Data Protection Legislation**”).

Should you have any questions regarding this Privacy Policy, or should you feel that your interests are not represented or are inadequately represented, please address your questions to us at [info@connus.app](mailto:info@connus.app).

You furthermore have the right to lodge a complaint at or to request more information from the competent Data Protection Authority in accordance with article 12 of this Privacy Policy. Should you ever have any questions or complaints, we invite you to first contact us in order for us to resolve any issues you might encounter.

## **Article 2      Personal data we collect and process**

In what follows, we will attempt to give you a general overview of the most important categories of personal data we might collect and process about you. Please note that these categories are not meant to include all personal data processed under this Privacy Policy, but that they merely serve to grant you a general overview. As a general rule, the personal data we collect and process about you will always be linked to the specific purposes set out under article 4 of this Privacy Policy.

Please be aware that the information we gather about you may depend on the capacity in which you come into contact with us. You will either come into contact with us as a mere visitor, a website or social media visitor, a prospect, a user, a company, a supplier, a service provider or possibly as an applicant. We additionally wish to point out in particular that you may contact us in your capacity as an employee of a corporate entity. In this circumstance, the corporate entity is not considered a data subject. However, you, in your capacity as a natural person, might qualify as a data subject in the meaning of this Privacy Policy and the Applicable Data Protection Legislation.

Please be informed that our services are neither intended for nor aimed at children. Our service is only accessible to users who are 16 years of age or older. We don't allow users under the age of 16 to access our platform and we do not knowingly collect personal information from anyone under the age of 16. If you suspect that a user is under the age of 16, please use the reporting mechanism to inform us.

Please find the relevant categories of personal data listed below:

A. [Basic contact and identification data](#)

B. [Service-specific data](#)

C. [Marketing data](#)

D. [Usage and technical data](#)

E. [Compliance data](#)

### **A. Basic contact and identification data**

This contact and identification data includes basic identifying and/or professional information such as your first name, surname, date of birth, gender, your company name and any other information you provide us by making an account on our web and/or mobile application/website. This category

furthermore includes data such as your e-mail address and telephone number and might refer to demographic information such as your address and certain preferences and interests you may have.

We inform you that such information may also be collected and processed on you in your capacity as a service provider for Connus, whenever applicable.

## **B. Service-specific data**

The service-specific data relates to any information you provide to us in the framework of the provision of our services to you. Please consider that this information is strongly dependent on your specific case and the assistance we provide to you.

In any case, by making an account on Connus and when interacting with us for our services, we will collect and store more extensive personal data on you. This data may refer among others to:

- Your name;
- Contact information, including the company you work for (if applicable), your email addresses, social media profiles, and all other information you provide to us by making an account on Connus (such as pictures you upload, location, age,..);
- Information such as: your Apple Appstore and/or Google Play Store ID and your unique device identifier (UDID), your social media handlers and login details, location information, contact preferences, your occupation, education, general payment information, invoicing details, VAT number, bank details, online behaviour, uploaded images, videos and other digital documents, collaboration messages, messages you send in the mobile and/or web application,...
- Pictures and video's or any other information from your social media accounts once you granted us access during the registration process;
- Any other information your provide to us;
- Information relating to the provision of the specific services you requested from us.
- Information you provide to us for the purposes of attending meetings and events, of participating in surveys, promotions or contests, of communicating with other connus-users, including dietary requirements which may reveal information about your health or religious beliefs;
- Information necessary to invoice the services we provided to you; and
- Other information that may be relevant to the provision of our services.

In certain circumstances, the service-specific information may fall under special categories of personal data as defined under the Applicable Data Protection Legislation, including personal data such as religious or other beliefs, political opinions, racial or ethnic origins, sexual orientation, health data, and details of trade union membership. We take particular care in handling this personal data and will as a base rule only process such data on the basis of your explicit consent to such processing.

### **C. Marketing specific data**

We collect data about your participation in our applications, conferences, seminars, and other events, including necessary credentials, associations, dietary requirements, personal interests, and preferences.

This data additionally includes your subscription to our newsletter, downloads, activity, etc.

### **D. Compliance data**

Connus is bound by specific legal obligations that impose on us the task of collecting and storing certain categories of personal data.

Should you fail to provide us with the required information under this section, we may not be able to perform our services in relation to you or we may decline to provide you with our services. We will clearly inform you of the importance of such information when we request you to provide it.

### **E. Usage and technical data**

We collect and store full IP addresses, unique device identifiers, your browser type, time zone settings, operating system, application-crash sessions, advertisement-ID's ( for example Google AAID and Apple IDFA), language, information about your wireless and mobile network connection, the specifications of the hardware you use to access our Website and social media accounts, etc. We also collect data about your activities on our website, webapplication and/or mobile application (for example which functions you use, which search criteria you enter, which ads you click on and how you interact with other users on the website or applications). We may furthermore collect personal data when you access our Wi-Fi network and other electronic services. Please note that the concerning data may among others be collected by automated means, such as for example cookies.

## **Article 3      How we collect personal data**

We use different methods for collecting personal data from and about you. Personal data is collected both in an online and offline environment. This means that personal data will not only be collected when you visit our Website, web application, mobile application, social media accounts or send us an email, but also, for example, when you hand us your business card, your portfolio, cv, application or attend a physical event of ours. .

Your personal data might furthermore reach us, not only directly via your own actions, but also via certain third-party sources. The most notable third-party sources are our partners who send us information about you. Such partners may among others consist of recruitment agencies, consultants, other companies or governmental and regulatory bodies. Other relevant third parties from whom we might receive your personal data are other users, companies, contracting parties, negotiation parties, etc.

We may also collect and receive personal data from publicly available sources, such as public registers for individuals and public registers for companies.

## Article 4 How we use personal data

In the next part, we set out the specific purposes for which your personal data might be collected and processed. In addition to explaining why and how we might use your personal data, we will provide you with the legal bases on which we base ourselves to legitimately make use of your personal data.

Please contact us in the manner described under article 11 of this Privacy Policy should you have any questions in relation to our collection and processing of your personal data.

Please find our processing purposes listed below:

A. [Interaction with us](#)

B. [Services](#)

C. [Marketing communications](#)

D. [Business administration](#)

E. [User insights and analytics](#)

F. [Compliance and enforcement](#)

F. [Security and IT management](#)

### A. Interactions with us

We may collect and process personal data about you when you exchange communications with us, whether or not related to the performance of our services. The personal data concerned refers in particular to all basic contact and identification data, as may be necessary for the proper exchange of information between us.

The interactions with us may happen via mail, telephone, fax, the forms available on our website, web application, mobile application, social media, or via any other communication or telecommunication technology at your disposal.

Please note that the processing under this section also includes interactions in an offline environment. This means that information, such as personal data on a business card you exchanged with us, will also be processed by us.

*For the collection and processing of your personal data in relation to our interactions, we base ourselves on **our legitimate interest** to provide you with the best possible interactions, among others in our provision of services, in answering to your requests and by providing you with proper response times.*

### B. Services

When you engage with us for the provision of our services, we will require you to provide us with the information necessary to service you. Such information may contain in particular basic contact and identification data, and all other data you provide to us by making an account on the Connus website, web application and/or mobile application, service-specific data, and compliance data. Please note that the personal data processed for this purpose is strongly dependent on the specific case and can therefore not be exhaustively listed in this Privacy Policy.

You are free not to share the personal data required for the performance of our services. However, choosing to withhold such personal data may result in the impossibility for us to execute our contractual obligations under the contract for the provision of services you concluded with us.

*For the collection and processing of your personal data in relation to the provision of our services in relation to you, we base ourselves on **the terms of service you agree to** when becoming a user of our website or applications.*

*Where special categories of information are processed for the provision of services, we will as a base rule additionally request your **explicit consent**. Where we deem the request for consent not to be suitable in the particular situation, we will base ourselves on our right to process such personal data for the limited **purpose of establishing, exercising, and/or defending legal claims**.*

### **C. Marketing Communications**

We may use your personal data, such as basic contact and identification data, for the purpose of providing you with information relating to conferences and other events we may host or participate in, communications regarding our fields of expertise.

*For the collection and processing of your personal data in relation to the marketing communications, we base ourselves on **your consent** to receive such communications.*

*If you are a user or otherwise engage(d) with our services, we may send you marketing communications based on the services we provide(d) you with. If you are a user or otherwise engaged with our services, we send you marketing communication based on our **legitimate interest** to keep you informed on related services and evolutions of our business.*

*When you receive marketing communications from, either on the basis of your consent, or on the basis of our legitimate interest, you retain at all times the right to opt-out from our receiver list by sending us an email to [info@connus.app](mailto:info@connus.app) or by clicking the unsubscribe button at the bottom of a specific marketing communication.*

### **D. Business administration**

We collect and process the basic contact and identification data of individuals acting in their capacity of representatives of their organisations, across the relevant sectors and fields of expertise, and of those people who are or might be our business partners or service providers.

This personal information may be used for the fixing of meeting dates and events. Where you choose to share such personal data with us, we may collect information on for example any dietary or any other health-related requirements you may have for such meetings or events.

*For the collection and processing of your personal data in relation to our business administration we base ourselves on **our legitimate interest** to store information on potential partners and/or service providers.*

### **E. Compliance and enforcement**

We use your basic contact and identification data, compliance data specific to our obligation, and usage and technical data for our own compliance with the legal and regulatory obligations imposed on us.

Please note that we may collect this information from you or from third-party sources, such as official instances managing such documentation from you on their own merit or on your instruction. We may among others collect and process personal data relating to you by accessing online registers (such as the Crossroads Bank for Enterprises, trademark and design registers, patent registers, other

information publicly available etc.) and by filing requests at official governmental registers and authorities.

We may process your personal data under this section for our own establishment and enforcement of claims or defences of a legal, administrative, or jurisdictional nature.

*For the collection and processing of your personal data for compliance with specific legal and regulatory obligations, we base ourselves on our necessity **to comply with the legal obligations to which we are subject**.*

*Where we process the personal data for the purpose of establishing or enforcing our own claims or defences, we base ourselves on our **legitimate interest** to protect our commercial, financial and legal interests as permitted by law.*

#### **F. User insights and analytics**

We may analyse the information including the personal data necessary for us to directly identify you in relation to other personal data, such as your interactions on the Website, web application, mobile application, social media connections, and your communications with us. This information relates in particular to your basic contact and identification data and the usage and technical data.

The gathering and analysis of such information may be performed by using cookies, web beacons, pixel tags, log files, scraping, API's social media connections and similar technologies used to gather personal data from the hardware and software you use to visit our Website, web application and/or mobile application including from any mobile devices you may use.

For more information regarding cookies, web beacons, and pixel tags used on our Website, web application and/or mobile application, please refer to our Cookie Policy.

Connus' use and transfer to any other app of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements. We ensure you that our employees, agents, contractors and successors also comply with the Google API Services User Data Policy.

*For the collection and processing of your personal data for user insights and analysis, we base ourselves on **our legitimate interest to use your personal data for the continuous improvement of our services, in order to provide you with the best possible experience, among others on our Website, applications and social media profiles**.*

#### **G. Security and IT management**

We use your basic contact and identification data, and usage and technical data for the purpose of ensuring the effective and secure functioning of our information security systems and more generally the online environment that we put at your disposal.

The gathering and analysis of such information may, among others, be performed by using cookies, web beacons, pixel tags, log files, and similar technologies used to gather personal data from the hardware and software you use to visit our Website and applications, including from any web and/or mobile devices you may use.

For more information regarding cookies, web beacons, and pixel tags used on our Website and application, please refer to our Cookie Policy.



*For the collection and processing of your personal data for the purpose of securing and ensuring the effective functioning of our online environments, we base ourselves on **our legitimate interest to monitor how our Website and applications are used and to detect and prevent fraud, criminal activities, and general misuse of our services.***

## **Article 5      How long we retain your personal data**

Our policy is to only retain your personal data for as long as it is required to satisfy the purposes for which we collected it or for which you provided it to us. Where such processing is based on your consent, we will process the personal data for as long as you have not withdrawn your consent. To protect the safety and security of our users on and off our services, we implement a safety retention window of three months following account deletion. During this period, account information will be retained although the account will of course not be visible on the services anymore.

## **Article 6      With whom we share your personal data**

In order to provide our services to you and in order to make our Website, applications and social media pages available to you, we may, with your consent, share your personal data with other users, third-party contractors and/or other controllers. The sharing of your personal data is performed where this is necessary for the performance of our services, or is subordinately based on our interest to provide our services to you in the best possible manner.

We do not share your personal data with third parties for secondary or unrelated purposes than those mentioned in this Privacy Policy, such as advertising platforms, data brokers, or any information resellers.

Please consider that because of the complexity and changing nature of our services, we are unable to provide you with an exhaustive list of all third parties with whom your personal data may be shared.

## **Article 7      International data transfers**

We are a Belgian company with offices registered in Belgium only. As a principle, your personal data will be stored and processed in Belgium. The personal data that we collect from you is in principle not transferred to, and stored at, a destination outside the EEA. In case such transfer would be needed, we will implement appropriate safeguards in our agreement with those third parties in order to provide your personal data the benefit of an adequate level of data protection and at least a level of data protection equivalent to the level to which you are entitled under the General Data Protection Regulation.

For this purpose, we assess the level of data protection in the country of transit or destination, among others taking into account the adequacy decisions taken by the European Commission. Additionally, we may make use of the Standard Contractual Clauses approved by the European Commission and any other appropriate solutions as required or permitted by the Applicable Data Protection Legislation.



Feel free to contact us as set out under article 11 of the Privacy Policy, should you have any questions regarding the international transfers of your personal data and the safeguards we have implemented in that regard.

## **Article 8 Your data protection rights**

Under the Applicable Data Protection Legislation, you are entitled to exercise certain rights in relation to your personal data collected and processed by us.

If you would like to be supplied with further information on your rights or wish to exercise them, please write to us at [info@connus.app](mailto:info@connus.app). We ask you to properly identify yourself when exercising your data protection rights in order to enable us to execute your request within the hereunder provided delays.

The exercise of your rights is free and will be executed within one (1) month of the receipt of your request to exercise your rights. We may extend this delay with an additional two (2) months for a total delay of three (3) months, should your request prove to be particularly complex. If we decide to extend the initial delay, we will always inform you of this decision in due time.

In those cases where we deem your request to exercise your rights manifestly unfounded or excessive, we reserve the right to charge you an administrative fee for the execution of your request, or even to refuse to act on your request. You will always be informed within the abovementioned timeframes of our decision.

Please find a brief overview of the rights you can exercise in relation to your personal data below:

A. [Withdrawal of consent](#)

B. [Right of access](#)

C. [Right of rectification](#)

D. [Right of erasure](#)

E. [Right to restrict the processing](#)

F. [Right to object to the processing](#)

G. [Right to data portability](#)

### **A. Withdrawal of consent**

You have the right to withdraw your consent in relation to all processing activities for which you have previously given us your consent. Please note that withdrawing your consent will not impact the validity of the lawful processing activities performed on your personal data before you withdrew your consent.

### **B. Right of access**

You are entitled to request a copy of the data we process and hold on you. If we process and/or hold personal data about you, you will receive a copy of the information in an understandable format together with an explanation of why and how we hold and use it.

Additionally, you can ask to receive information regarding the recipients or categories of recipients to whom your personal data has been disclosed.

### **C. Right of rectification**

You have the right to ask us to correct your personal data. This includes the right to have us correct spelling mistakes or change an address, email addresses, phone numbers, etc.

Additionally, depending on the purposes of the processing, you have the right to complete any incomplete information we process or hold about you.

#### **D. Right of erasure**

You have the right to request the deletion of the personal data we process or hold on you. We can object to the deletion of your personal data if the processing is done to comply with legal obligations, for reasons of public interest, or for the establishment, exercise, or defence of our legal claims.

Should you wish to erase your personal data processed on the basis of a contract you concluded with us, we may terminate our performance of the services provided to you under that contract if the processing of such personal data is required for the performance of the contract.

#### **E. Right to restrict the processing of personal data**

Under certain circumstances, you have the right to ask us to restrict our processing of your personal data. Please note that in exercising this right, the relevant personal data will remain stored in our possession, but we will not be able to further process it. You can ask us to restrict the processing of your personal data where:

- you believe that the personal data we process on you is inaccurate;
- our processing of your personal data should be unlawful;
- we are no longer required to process your personal data for the purposes set out in article 4, but we are not allowed to delete your personal data due to a legal or other obligation; or
- you object to our processing of your personal data as set out below, but you do not want us to delete your personal data.

#### **F. Right to object to the processing**

In those instances where we process and collect your personal data, you have the right to object to our processing of such data. Please note that if you decide to exercise your right to object to our processing of your personal data, we have the right to provide you with our legitimate grounds on which we base ourselves in order to continue the processing of your data.

Our decision to continue the processing of your personal data does not preclude you from filing a complaint with the relevant supervisory authority as set out further below under article 12.

#### **G. Right to data portability**

You are entitled to receive the personal data we process or hold on you in a structured, commonly used, and machine-readable format. Furthermore, you have the right to have this personal data transmitted to another data controller, where

- the personal data in question was provided to us by yourself; and
- we process the personal data on the legal basis of your consent or under an agreement you have concluded with us, as detailed under article 4 of this Privacy Policy.

Please be informed that we are allowed to refuse your exercise of this right if we deem the requested action to be taken not to be technically feasible, a legal obligation precludes us from transferring or providing you with such personal data, or if the exercise of your rights under this section goes against our legitimate interest.

## **Article 9 Security of your personal data**

We use generally accepted and reasonable technical and organisational methods consistent with current technological developments with regard to operational security to offer protection against loss, abuse, alteration, or destruction of all personal data we store and process.

Our technical and organisational measures are frequently updated in order to adapt these measures to new technical and organisational procedures and to ensure the continued safety of your personal data.

Please note that our Website, applications and social media accounts may contain links to other websites or internet resources which may also collect personal data, through cookies or other technologies. We carry no responsibility, liability for, or control over those other websites or internet resources or their collection, use, or disclosure of your personal data. We recommend that you review the privacy policies of these other websites and internet resources in order to understand how they collect and process your personal data.

## **Article 10 Amendments to the Privacy Policy**

We may bring adaptations and improvements to the Privacy Policy from time to time. These changes will mainly be made to account for new case law and practices developing in the data protection field, and in order to ensure your control over your personal data.

The most current version of the Privacy Policy will always be displayed on the Website and can be requested via [info@connus.app](mailto:info@connus.app). On top of this Privacy Policy, you will be able to check the date on which we last implemented changes to the policy. Please contact us if you wish to consult earlier versions thereof.

## **Article 11 Your questions and queries**

You undertake to communicate accurate personal data to us. You may at any time modify the personal data at our disposal by sending us an email. We cannot be held responsible for any failure of our services related to incorrect information that has been provided by you.

Should you have any questions about this Privacy Policy or should you have the feeling that your interests are not or inadequately represented, you can address all your questions to us at the following email address: [info@connus.app](mailto:info@connus.app).

## **Article 12 Dispute resolution**

This Privacy Policy shall be governed by - and construed in accordance with - the Belgian legislation.

You have the right to file a complaint with the competent data protection authority, being the authority in the Member State of your habitual residence, your place of work, or the place of the alleged infringement of the Applicable Data Protection Legislation. Notwithstanding the previous, the lead data protection authority is the Belgian Data Protection Authority ("*Autorité de protection des données*" or "*Gegevensbescherming Autoriteit*"), which can be reached via the following means of communication:

- by following the instructions and filling in the form accessible via this [link](#);
- by sending a letter to Drukpersstraat 35, 1000 Brussels, Belgium;
- by calling the following number +32 (0)2 274 48 00;
- by faxing to +32 (0)2 274 48 35; or
- by sending an email to [contact@apd-gba.be](mailto:contact@apd-gba.be).