

Terms & Policies – Lhuna solution

PRIVACY STATEMENT

Creacode EBVBA, located in Belgium, Begoniastraat 10, 8830 Hooglede, processes your personal information in compliance with this privacy statement. The statement explains how we collect, use, protect or otherwise handle your personal data when you use our websites, software or services.

Collection of personal data.

We collect personal data from you for one or more of the following purposes:

- To provide you with information that you have requested or that we think may be relevant to a subject in which you have demonstrated an interest.
- To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services.
- To fulfill a contract that we have entered into with you or with the entity that you represent.
- To ensure the security and safe operation of our websites and services.
- To manage any communication between you and us.

Account data.

We collect, and associate with your account, the information you provide to us when you register for your account or place an order, like your name, email address, company info.

We process this data for customer and order administration and to provide our services.

We may also use this data or anonymized data for analytics, with the purpose of improving our websites and services, based on our legitimate business interests.

The data may be used to inform you about new updates, products and services, upon your consent. You can easily withdraw or update your preferences for receiving this kind of marketing messages in the account section of your application.

User data.

Information about the users of your account is provided and managed by you or members of your organization (our customer). We process this user information, specifically the login credentials, to provide secure access to our services.

Legal bases for processing your data.

We collect and use the personal data described above in order to provide you with our services in a reliable and secure manner. We also collect and use personal data

for our legitimate business needs. To the extent we process your personal data for other purposes, such as marketing, we ask for your consent in advance.

Cookies.

Our sites and services make use of technical and functional cookies.

The use of technical cookies allows us to make the website's functions user-friendly, such as providing you with a smooth experience for putting in an order. They are necessary for our website to function properly. These cookies disappear when your browser session ends.

The functional cookies are used to remember your preferences, so that you do not have to provide them each time you visit our site or use our services.

Currently we do not use analytics cookies or commercial cookies.

You can manage the use of cookies through your browser settings. If you choose not to accept certain technical and/or functional cookies, you may not be able to use some functions on our website.

Data protection and access.

Safeguarding of your data is critical to us and a responsibility we take seriously. We implement industry-standard security measures for storing and processing your data and we are committed to keeping your data confidential.

Creacode uses certain trusted third parties to assist in providing, improving, protecting and promoting its services, such as providers of customer support and IT services. We choose these partners in part based on their commitment towards security and privacy. They will access your data only to the extent necessary to provide agreed upon services on our behalf in compliance with this privacy policy. We will remain responsible for their handling of your information.

Third-party services we use include:

- Microsoft Azure, with EU-based servers, for hosting and data storage.
 - Microsoft offers a secure cloud IT environment and guarantees towards privacy.
 - With respect to international transfer of personal data: "Europe's privacy regulators have determined that the contractual privacy protections that Azure delivers to its customers meet current EU standards for international transfers of data".
- C3A nv as value-adding partner, for promotion and support of our services.

We will not sell, trade, or otherwise transfer your personal data to advertisers or other third parties. We may have to release information when its release is appropriate to comply with the law, enforce our site policies, or protect our or

others' rights, interest or safety. We will not do so without thoroughly examining the legitimacy of any such case.

Our websites or services may contain links to third-party websites or services. These websites and the information you provide there will be governed by their privacy policy and terms.

Data retention.

When you register for an account, we will retain the information you store through our services for as long as your account is active. When your account becomes inactive (your license ends, and you do not renew it), we will keep your data safe for at least 30 days, after which it will be deleted from our servers and backup storage.

Please note that we may retain certain customer data as necessary to comply with our legal obligations, resolve disputes or enforce our agreements. As such, personal data processed for customer management will be stored for the time necessary to satisfy legal requirements. We may also retain or anonymize certain personal data for which an overriding legitimate reason for processing continues to exist.

As a matter of course, we will delete all personally identifiable information associated with customer accounts that have been inactive for 7 years.

Your rights to control your personal data.

You as a customer can inspect and correct or improve your account contact information and users' data in the account section of your application.

Access to the account section of the application can be restricted to only certain members of the organization. If you as a user have no access, you should consult your manager for rectifying your personal data.

By sending us an email at info@creacode.be, a data subject can:

- ask us to rectify his/her personal data,
- obtain a copy of the personal data we hold,
- object to any processing of his/her personal data aimed at direct marketing,
- end the account at any time and have deleted all personal data for which no overriding legal basis or legitimate reason for processing continues to exist.

Contact or complaints.

If you have questions or concerns regarding this privacy policy, you can contact us at info@creacode.be.

You also have the right to file a complaint with the Belgian Privacy Protection Commission (35 Rue de la Presse, 1000 Brussels - commission@privacycommission.be).

We may revise this privacy policy from time to time and will post the most current version on our website.

—

Last updated 15/10/2018.