

PRIVACY POLICY

Thing BV, with its registered office at 3500 Hasselt, Slachthuiskaai 24, registered in the Crossroads Bank for Enterprises under number 0667.863.113, RPR Antwerp department Hasselt (hereafter, 'we' or 'Thing'), considers the protection of personal privacy to be extremely important. We therefore take all appropriate measures to protect your privacy in accordance with applicable laws and regulations, including Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data relating to free movement of those data and repealing Directive 95/46 / EC (the "GDPR").

Through this Privacy Policy we want to explain to you as clearly and transparently as possible what personal data we can collect from you, why we want to collect it, how we want to use it, and how we want to handle it. We also wish to inform you about your privacy rights and how you can exercise them.

For the purposes of this privacy statement, "personal data" means all information about an identified or identifiable natural person ("the data subject"). A natural person is considered to be identifiable if he can be identified directly or indirectly, namely, on the basis of an identifier such as a name, identification number, location data, an online identifier or of one or more elements characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person. In other words, it is all information on the basis of which a person can be identified. This includes, for example, your name, date of birth, address, telephone number and e-mail address, but also your IP address.

Anonymous data and data about deceased persons or legal entities are not personal data within the meaning of the GDPR. Data are anonymous only if it is absolutely impossible for a link to be made to the person involved.

The term "processing" is very broad and covers, among other things, collecting, recording, organizing, storing, updating, changing, retrieving, consulting, using, distributing, combining, archiving and deleting data.

When do we process which personal data and on what legal basis?

We process your personal data when you:

- visit our website;
- use our services;
- conclude or wish to conclude an agreement with us;
- contact us;
- interact with us in some other way;
- subscribe to a newsletter; or
- provide us with personal data about yourself in another way (for example, when you request a quote online or fill in another online form while using our website).

In this regard, we process the following personal data in the following cases:

When do we process personal data?	Which personal data?
<i>Personal data that you provide to us</i>	
Provision of our services, including but not limited to: <ul style="list-style-type: none"> • business intelligence; • data engineering consulting services; • sale and programming of software destined for interprofessional data. <p><i>The provision of personal data is necessary in order to execute the agreement. If these are not provided, the agreement cannot be executed.</i></p>	<ul style="list-style-type: none"> • first name • name • address (delivery address where appropriate) • (mobile) telephone number • bank account number • e-mail address • language preference • any business data such as the enterprise number and/or VAT number insofar as the data in question concerns an identified or identifiable natural person • payment data
Contests and marketing promotions <p><i>The provision of personal data is not mandatory. If these are not provided, marketing promotions or participation in contests cannot be enjoyed.</i></p>	<ul style="list-style-type: none"> • first name • name • address (delivery address where appropriate) • (mobile) telephone number • e-mail address • language preference
Visiting our websites	<ul style="list-style-type: none"> • IP-address • cookies (for this, see our Cookie Policy)
<i>Personal data that we do not receive directly from you</i>	
Enrichment of your personal data obtained from external sources	<ul style="list-style-type: none"> • first name • name • address • whether or not you are on the "Do not call me" list

Thing does not process sensitive data such as, among other things, data about your racial or ethnic origin, political views, sexual preferences and health.

In principle, we also do not intend to collect personal data from persons younger than 16 years of age. These young people are not allowed to provide us with personal data or issue a consent form without the consent of the person who has parental responsibility.

Why do we process personal data and on what legal grounds?

We process personal data for several purposes, whereby we only process the personal data that are necessary to achieve the intended purpose.

When processing your personal data, the provisions of the GDPR and all other applicable provisions regarding privacy legislation are complied with. Our processing activities are always supported on one of the six possible legal grounds, as stated in art. 6 GDPR.

These are usually the following legal bases:

- in the context of the preparation or implementation of our contract;
- to comply with the legal or regulatory provisions to which we are subject;
- when we have a legitimate interest in that regard, in which case we always strive to strike a balance between this interest and respecting the privacy of the person concerned; and
- when we have received your permission.

Specifically, your personal data may be processed by Thing for the following purposes, based on the following legal grounds:

Processing purposes for which the personal data are intended	Legal basis for processing
to process and execute your request for our products and services	in the context of the preparation or implementation of our contract
for our customer administration	in the context of the preparation or implementation of our contract
to offer you the best service	in the context of the preparation or implementation of our contract
to improve the content of our products, services and our website	our justified legitimate interest
for direct marketing purposes	our justified legitimate interest (customers) or your permission (non-customers)
for the sale and promotion of our services and products	our justified legitimate interest
to keep track of studies, tests and statistics	our justified legitimate interest
for the management of our website	our justified legitimate interest
for the management of our contests and promotional campaigns	our justified legitimate interest
to prevent and detect abuse or fraud	our justified legitimate interest
to guarantee everyone's safety	our justified legitimate interest
to inform you about (new) products and services of ours and of our related companies (such as parent, subsidiary and sister companies)	our justified legitimate interest (customers) or your permission (non-customers)
for compliance with legislation and regulations	to comply with the legal or regulatory provisions to which we are subject

How long do we keep the data?

Thing does not store personal data for longer than necessary for the purpose for which it was provided. Bear in mind that many (legal) retention periods require that personal data (must) remain stored. This applies in particular to registration obligations and retention obligations with regard to company law or tax law (for example, Companies and Associations Code, Tax Code, Economic Law Code, etc.). Insofar as there is no obligation to retain them, the personal data are routinely deleted after the purpose for which they were collected has been achieved.

In addition, we may store personal data if you have given us permission for this or if we may need this data in the context of legal proceedings. In the latter case, we must use certain personal data as evidence. To this end, we store certain personal data in accordance with the legal limitation period, which can be up to 30 years; however, the usual limitation period for personal legal claims is ten years.

Do we pass this personal data on to third parties?

Thing does not sell personal information to third parties, nor do we pass it on to third parties, unless:

- to our legal successors and other related companies (such as parent, subsidiary and sister companies) for the same purposes as those stated in this Privacy Policy;
- this is necessary for our services (for example, to suppliers);
- with regard to business transfers (in the event of reorganization, restructuring, merger, sale or other transfer of assets, we reserve the right to also transfer data, including personal data, provided that the receiving party agrees to process your personal data in accordance with our Privacy Policy);
- there is a legal obligation;
- there is a legitimate interest for Thing or the third party involved;
- you give us permission for this.

We never pass on personal data to other parties with whom we have not concluded a processing agreement.

We naturally make the necessary arrangements with these parties (processors) to guarantee the security of your personal data.

Your personal data can also be shared outside of Europe. Thing undertakes to only appoint persons to be responsible for processing and/or processors outside the European Economic Area who, in accordance with the applicable privacy legislation, offer sufficient guarantees regarding the security and protection of personal data. If a transfer takes place to a country outside the EU, for which the European Commission has not determined that the country offers an appropriate level of protection, the transfer is always subject to an agreement that meets all requirements for transfers to third countries, such as the approved standard data protection provisions that have been established by the European Commission. The standard provisions approved by the European Commission can be consulted via the following hyperlink:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_nl.

How do we protect your personal data?

We have taken appropriate technical and organizational measures to protect your personal data against unlawful processing; for example, we have taken the following measures:

- all persons who can access your data on behalf of Thing are obligated to keep them confidential;
- we maintain a username and password policy on all our systems;
- we use pseudonyms and provide for the encryption of personal data if there is reason to do so;
- we make backups of the personal data in order to be able to restore it in the event of physical or technical incidents;
- we regularly test and evaluate our measures;
- our employees have been informed about the importance of protecting personal data.

What are your rights and how can you exercise them?

<i>Right of inspection (Article 15 GDPR)</i>
<p>You have the right to (free) access to the data that concerns yourself. You can ask us:</p> <ul style="list-style-type: none">• whether we process personal data belonging to you;• which categories of personal data we process;• with which categories of third parties we share your personal data;• for what purpose we process it;• how long we keep the personal data;• the origin of the processed data; and• whether there is automated decision making (including profiling) and what logic we use for this and what your interest in and the consequences of this are for you.
Right of correction ("rectification") (Article 16 GDPR)
<p>You have the right to have incomplete, incorrect, inappropriate or outdated personal data corrected. For this you can contact us in the manner indicated below. To keep your data up-to-date, we request that you notify us of any changes.</p>
Right to data erasure ("right to be forgotten") (Article 17 of the GDPR)
<p>You can ask us to delete your data under certain conditions. In this case, however, you should bear in mind that we can no longer offer you service if you wish such. However, your right to be forgotten is not absolute. We have the right to keep your data when necessary for, among other things, compliance with a legal obligation or the establishment, exercise or substantiation of a legal claim.</p>
Right to limitation of processing (Article 18 of the GDPR)
<p>You have the right to ask us to limit the processing of personal data if one of the following conditions applies:</p> <ul style="list-style-type: none">• the personal data we have is not correct;

- you have objected to the processing in general;
- you believe that we are processing your data unlawfully and you object to the deletion of the personal data but you request a limitation of its use;
- we no longer need the personal data for the purposes for which we have requested them, but you need them for legal action.

Right to data portability (Article 20 of the GDPR)

You have the right to ask us to obtain all your personal data in a structured, current and machine-readable form and, to the extent technically possible, to have us transfer it to another processing controller, provided that both of the following conditions are met:

- it concerns personal data that we have processed based on your consent or based on an agreement; and
- the processing is done via automated procedures.

The technical feasibility of this is assessed exclusively by us.

Right to object (Article 21 GDPR)

You have the right to object to the processing of your personal data for specific reasons that apply to you.

To oppose the use of your personal data for direct marketing purposes, you do not have to provide a reason. In other words, you can object to this at any time. In that case, your personal data will no longer be processed for direct marketing purposes.

The right not to be subject to automated individual decision-making (Article 22 of the GDPR)

You have the right to object to an exclusively automated processing of your personal data, including profiling, that has legal consequences for you.

However, if processing is permitted by law or is necessary for the realization or execution of deliveries of our products or services, we cannot comply with a request not to be subject to automated individual decision-making.

Right to withdraw your consent (Article 7 of the GDPR)

If your personal data is processed on the basis of your consent, you can revoke this consent at any time upon simple request (without prejudice to the lawfulness of the processing based on the consent prior to the withdrawal).

Exercising your rights

To exercise the above rights you can contact: privacy@thing.be. To verify your identity, we ask you to send a copy of the front of your identity card.

Processing controller

Your personal data are processed by Thing who is the one responsible for the processing ("the controller"). This means that we determine the purpose and means for processing your personal data.

How to contact us

If after reading our Privacy Policy, or in a more general sense, you have questions about this or want to contact us, you can do so via the contact details below:

Thing BV
Slachthuiskaai 24
3500 Hasselt
privacy@thing.be

You have the right to submit a complaint to the Data Protection Authority, this is the privacy protection supervisory authority:

Data protection authority ('DPA')
Drukpersstraat 35
1000 Brussels
+32 (0)2 274 48 00
contact@apd-gba.be
<https://www.dataprotectionauthority.be>

Privacy Policy changes

Thing can change this Privacy Policy. We therefore invite you to always consult the latest version of this policy on our website. We will of course inform you via our website or other current communication channels of any substantive changes.