Kadonation NV | Gordunakaai 61, 9000 Gent
BTW BE-0666.820.362
E: compliance@kadonation.com

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PRIVACY POLICY – KADONATION NV

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*This privacy policy ("**Privacy Policy**") is applicable to all processing activities of KADONATION (as defined below) as a data controller.*

*Please read this Privacy Policy together with our **Cookie Policy** (https://kadonation.com/en/cookie-policy). KADONATION may update this Privacy Policy in the future: the latest version can always be found on our Website (https://kadonation.com/en/privacy). You can find our archived Privacy Policies in pdf format here: https://kadonation.com/en/compliance-security.*

1. ABOUT THIS PRIVACY POLICY

Due to, for example, your commercial relationship or recent contact with KADONATION or due to a visit to or action on our "**Website**" (i.e. **https://kadonation.com/**, including related domains such as app.kadonation.com and kadonationselect.com and their sub-domains) we may collect, store and otherwise process personal data relating to you or, if you are a company, your employees / representatives ("**your personal data**").

This Privacy Policy describes **(i)** how we collect, treat and store your personal data; **(ii)** the rights you can exercise in relation to your personal data; and **(iii)** the measures we take to protect it and to secure your personal data.

KADONATION respects your privacy and we always strive to act in accordance with the applicable privacy legislation, such as (non-exhaustive): **(i)** the General Data Protection Regulation 2016/679 of April 27, 2016 ("**GDPR**"); **(ii)** the ePrivacy Directive 2002/58/EC of 12 July 2002, including future amendments and revisions thereof; and/or **(iii)** (future) national legislation regarding the implementation of the GDPR (together: "**Privacy Legislation**").

2. KADONATION IS THE DATA CONTROLLER

We are **KADONATION NV,** a limited liability company, incorporated and existing under the laws of Belgium, with registered office at Gordunakaai 61, 9000 Ghent, Belgium, registered with the Crossroads Database for Enterprises under number BE0666.820.362 ("**KADONATION**" or "**we / us**").

KADONATION is the developer and provider of the KADONATION solution as described and represented on the Website ("**Solution**"), the corresponding service of KADONATION ("**Service**") and is the owner of the Website.

In light of the Privacy Legislation, KADONATION will act as the **data controller** of your personal data for the purposes described in this Privacy Policy. This means we are in control of (and thus, responsible for) your personal data.

3. KADONATION'S PROCESSING ACTIVITIES

Which personal data we collect, store and process and the purpose for which we process this data may differ depending on your relation with KADONATION.

In particular, we identify **six different scenarios**:

1. You are **browsing** on our Website;
2. You (wish to) receive **direct marketing** (such as updates and newsletters) relating to KADONATION's Solution and/or Service;
3. You are a **prospect** and/or seeking a commercial relationship with KADONATION;
4. You are a **private customer** purchasing, redeeming or starting a group gift voucher;
5. Your company is an **active KADONATION customer** and/or seeking a commercial relationship with KADONATION; or,
6. You are | your company is a **partner** or a **supplier** of KADONATION.

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3.1 You are browsing our Website

Contacting KADONATION via the contact form

Purpose: To answer any questions you may have and/or to initiate a conversation

Personal data:
- ❑ First name
- ❑ (Work) email address
- ❑ Nature of inquiry
- ❑ Telephone number (optional)
- ❑ Voluntarily provided information

Legal ground: Consent

Retention period: Up until one (1) year after your last contact with KADONATION

Cookies

When browsing on our Website, we may also collect your personal data through cookies stored on your device(s) in order to optimize the functioning of the Website. Please read this Privacy Policy in conjunction with our **Cookie Policy** (https://kadonation.com/en/cookie-policy) for more information.

3.2 You (wish to) receive direct marketing (such as updates and newsletters) relating to KADONATION's Solution and/or Services

Direct marketing

Purpose: Providing more information on (new features of) KADONATION, our Solution or related products/Services

Personal data:
- ❑ First name
- ❑ (Work) email address

Legal ground: Consent

Retention period: Until you have objected to the processing of your personal data for this purpose (cfr. Section 8- "Right to object"). You will be automatically unsubscribed if we did not contact you for over five (5) years.

3.3 You are a prospect and/or seeking a commercial relationship with KADONATION

General communication with KADONATION & prospecting by KADONATION

Purpose: To have quality conversations (via mail, telephone or business social media channels) in which KADONATION provides more information on its Services

Personal data:
- ❑ First name
- ❑ Last name
- ❑ Company name
- ❑ Type of industry
- ❑ Social media / business channel
- ❑ Job title
- ❑ (Work) email address
- ❑ Phone number
- ❑ Country
- ❑ Preferred Language
- ❑ Voluntarily provided information

Legal ground: Legitimate interest

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Retention period:	Until you have requested to no longer be contacted by KADONATION or until six (6) months following your latest contact with KADONATION, whichever comes first (+ verification period of six months)

3.4 You are a private customer

General communication and (technical) support via the support chat

Purpose:	To assist you with possible issues and/or answer any questions you may have and/or to initiate a conversation
Personal data:	❑ Full name ❑ (Work) email address ❑ Voluntarily provided information ❑ Information about the enquiry
Legal ground:	Necessary for the performance of the agreement
Retention period:	Up until two (2) years after your last contact with KADONATION

Creating of your account

Purpose:	To make use of KADONATION Services or its Solution
Personal data:	❑ Full name ❑ Country ❑ Date of birth (optional) ❑ (Work) email address ❑ Password ❑ Telephone number (optional)
Legal ground:	Necessary for the performance of the agreement
Retention period:	Until two (2) years following the termination of the commercial relationship between you and KADONATION (+ verification period of six months)

Starting a group gift / giving a gift voucher

Purpose:	To make use of KADONATION Services or its Platform
Personal data:	❑ Full name ❑ Email address ❑ Name receiver (optional) ❑ Other voluntarily provided information ❑ Photo of your choice (optional)
Legal ground:	Necessary for the performance of the agreement
Retention period:	Until two (2) years following the termination of the commercial relationship between you and KADONATION

3.5 Your company/employer is an active KADONATION customer

If you read this Policy as an employee of a company relying on the KADONATION Solution, please note that your employer is to be considered your data controller (as your employer decided to rely on the Solution, choses if you get an account, etc.). Your employer might have provided us with some of your personal information (e.g. your name, your email-address, etc.). In this context, KADONATION has adopted a Data Processing Policy (https://kadonationselect.com/data-processing-agreement).

Nevertheless, in some exceptional cases, KADONATION will act as your data controller. More specific, KADONATION will act as your data controller for the following purposes:

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General communication and (technical) support

Purpose: To enable communication with & to provide support to customers

Personal data:
- ❑ Full name
- ❑ (Work) e-mail address
- ❑ Company information (name, VAT-number)
- ❑ Telephone Number
- ❑ Billing address

Legal ground: In relation with the customer: necessary for the performance of the agreement

In relation with the end-users: legitimate interest

Retention period: Until one (1) year following the termination of the commercial relationship between your company and KADONATION

Small business orders (<500 vouchers) placed via the Website

Purpose: To make use of KADONATION Services or its Platform

Personal data:
- ❑ Full name
- ❑ (Work) e-mail address
- ❑ Company (name, VAT-number)
- ❑ Telephone Number (optional)
- ❑ Billing address
- ❑ Delivery address (only in case of physical gift vouchers)

Legal ground: Necessary for the performance of the agreement

Retention period: Until one (1) year following the termination of the commercial relationship between your company and KADONATION

Billing

Purpose: To prepare invoices for the Service | use of the KADONATION Platform

Personal data:
- ❑ First name
- ❑ Company
- ❑ Last name
- ❑ (Work) e-mail address
- ❑ Address
- ❑ VAT-number
- ❑ Job function

Legal ground: Necessary for the performance of the agreement

Retention period: Until two (2) years following the termination of the commercial relationship between your company and KADONATION with an additional period of 7 years for bookkeeping reasons.

Quotes | proposals

Purpose: To draw up (additional) quotes | proposals

Personal data:
- ❑ First name
- ❑ Company
- ❑ Last name
- ❑ (Work) e-mail address
- ❑ Address
- ❑ VAT-number

Legal ground: Legitimate interest

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Retention period: Until one (1) year following the termination of the commercial relationship between your company and KADONATION

3.6 You are or your company/employer is a supplier or partner of KADONATION

General communication and provision of services

Purpose: To communicate with you in the scope of our commercial relationship

Personal data:

- ❑ Full name
- ❑ Last name
- ❑ Company
- ❑ Job function
- ❑ Email address
- ❑ Telephone number
- ❑ Preferred Language
- ❑ Voluntarily provided information

Legal ground: Necessary for the performance of the agreement

Retention period: For the duration of your commercial relationship with KADONATION and in any event accordance with any (data processing) agreements concluded with KADONATION

Billing

Purpose: To pay your invoices for the services provided (incl. corresponding communication)

Personal data:

- ❑ First name
- ❑ Last name
- ❑ Address
- ❑ Job title
- ❑ Company
- ❑ (Work) e-mail address
- ❑ Financial data (e.g. bank account number)
- ❑ VAT-number

Legal ground: Necessary for the performance of the agreement

Retention period: For the duration of your commercial relationship with KADONATION and in any event accordance with any (data processing) agreements concluded with KADONATION

3.7 GDPR information document during application procedure

At Kadonation NV, we attach great importance to the protection of the personal data of applicants and employees. This document explains which data we collect, why we process it, and what rights you have under the GDPR. For questions, you can contact hr@kadonation.com.

Purpose: The personal data is processed to assess whether there is a match with the vacancy (vacancies) and to consider future career opportunities within Kadonation. This way, a candidate does not need to be contacted multiple times or unnecessarily go through an application process twice if the information were lost.

This data is also used for communication during the application process. Your data is processed on the basis of:

- The necessity of taking steps prior to entering into an employment contract

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	● Kadonation's legitimate interest in managing applications and filling future vacancies
Personal data:	❑ First and last name ❑ Place of residence ❑ Contact details ❑ LinkedIn or other social media (if mentioned in your CV) ❑ Education and diplomas ❑ Skill set and work experience ❑ Language skills ❑ References ❑ CV (if sent) ❑ Notes taken during job interviews
Rights of the applicant	As an applicant, you have the right to: ● Access, correct or have your data deleted ● Object to the processing of your data ● Restrict the processing of your data ● Have your data transferred to another party (data portability) To exercise these rights, you can contact hr@kadonation.com.
Retention period:	● Data of candidates who are not invited for an interview is deleted immediately. ● Candidates who are invited for an interview become part of a recruitment reserve. Their data is retained for up to 12 months after the end of the recruitment process, unless the candidate objects to this. ● Data of candidates who are hired is included in the personnel file and retained in accordance with legal guidelines.
Data storage:	Your personal data is stored in our project management software, which is secured by means of restricted access. Only HR, Exco and relevant managers have access to this data. Who can you contact with questions about the storage of your data? Contact hr@kadonation.com.

4. LEGAL GROUNDS

You can find more information on the applicable ground for each of the identified processing activities in **Section 3** above.

In case the legal ground for processing happens to be **legitimate interest**, KADONATION shall always (**i**) assess whether this is in proportion with the purpose for which your personal data was collected and used; and, (**ii**) take your reasonable expectations into account and ensure a balance with your fundamental rights and freedoms. If we cannot guarantee this, we will stop storing / using your personal data or we will determine a new legal ground.

5. RETENTION PERIODS

You can find more information on the retention period of your Personal Data for each of the identified processing activities in **Section 3** above.

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We do not process your personal data any longer than is necessary for the purposes set forth in this Privacy Policy. Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, KADONATION shall only store your personal data for the period necessary to achieve and fulfil the purpose in question. If you want to receive a more detailed description of our different data retention periods, you can always contact compliance@kadonation.com.

6. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

KADONATION shall not disclose your personal data to other third parties, unless it is necessary to achieve the purposes described in this Privacy Policy. In this respect, (some of) your personal data may be disclosed to:

- **Payment providers** (e.g. to process payments or prevent/detect money laundering or fraud)
- **Software and cloud providers** (facilitate hosting of (data for) Services)
- **Other service providers** (e.g. help development or provision of Services)

Of course, we have made sure that the necessary contracts or similar legal binding acts are in place to ensure that these third parties treat your personal data in accordance with the Privacy Legislation (e.g. **Article 28 GDPR**).

In addition, we might transfer your personal data:

- **To competent authorities:** for instance, because **(i)** we are obliged to provide your personal data under law or in the scope of (future) legal proceedings, or **(ii)** this is necessary to safeguard our rights; or,
- **In M&A context**: meaning, if KADONATION or the majority of its assets, is taken over by a third party, in which case your personal data – which KADONATION has collected – may be one of the transferred assets.

KADONATION shall not transfer, sell, hire out or pass on your personal data to third parties for purposes outside the purposes listed in this Privacy Policy, such as, but not limited to marketing purposes, 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.

7. CROSS-BORDER PROCESSING OF PERSONAL DATA

In case any of the above mentioned third parties or other recipients are located in a country **outside the European Economic Area**, KADONATION will ensure that one or more of the listed EU-approved safeguards are in place:

- **European Commission adequacy decision**;
- **Data transfer agreement** (cfr. the Standard Contractual Clauses as provided in the European Commission Implementing Decision (EU) 2021/914 of 4 June 2021, including the performance of a transfer impact assessment);
- **Binding corporate rules**; or,
- **Certification mechanisms**.

Every transfer to a third country, not recognized by an adequacy decision, is subject to an assessment by KADONATION to determine if there is anything in the law and/or practices in force of said third country that may infringe on the effectiveness of the appropriate safeguards in place (as identified above).

Where required based on aforementioned assessment, KADONATION shall identify and implement appropriate supplementary measures to govern any data transfer to such international organization or a third country without an adequacy decision to ensure the level of data protection as required by EU law.

Furthermore, KADONATION shall take all reasonable efforts to implement sufficient guarantees and measures to protect the personal data and ensure the effectiveness of the protection of the SCC's, binding corporate rules and/or certification mechanisms.

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8. YOUR PRIVACY RIGHTS

The Privacy Legislation (e.g. GDPR) gives you certain rights over your personal data in relation to KADONATION. You can exercise these rights by contacting us through compliance@kadonation.com, as stipulated in Section 11.

Access:	you can ask for confirmation whether personal data that relates to you is being processed. If so, you can ask us to give you copies of your personal data in structured and commonly used, machine-readable format;
Rectification:	you can ask us to correct | complete any information you believe is inaccurate | incomplete;
Erasure:	you can ask us to erase your personal data, under certain conditions. Please be aware that in this context certain services will no longer be accessible and/or can no longer be provided.
Objection:	you can object to us processing your personal data, without any justification and/or the transmission of your personal data to third parties.
Restriction of processing:	you can ask us to restrict the processing of your personal data, unless we have legitimate interests for the processing of your personal data that prevail over your interests
Data portability:	you can ask us to transfer your personal data to another organization, or directly to you in a commonly used structured format readable by automatic device, under certain conditions.

Updates | Newsletters. You can change your communication preferences in the communication preferences centre on the Website (you can find a unique link in the footer of every KADONATION communication). If you wish not to receive any KADONATION communication anymore, you can object to this direct marketing communication by (i) filling in the **Data Subject's Rights Form** (as indicated above) or (ii) by contacting us via email at compliance@kadonation.com. Upon receipt of your objection, we will stop processing your Personal Data for KADONATION communications.

9. SECURITY

KADONATION undertakes to take reasonable, physical, technological and organizational precautions to avoid **(i)** unauthorized access to your personal information, and **(ii)** loss, abuse or alteration of your personal data. However, KADONATION is not in a position to guarantee absolute security.

The security of your account will also partly depend on the confidentiality and complexity of your password. You may not disclose to or share with any third parties your account. KADONATION therefore strongly advises you, if you observe that someone has accessed your account or if your account has the risks being hacked, to immediately change your password and contact us at compliance@kadonation.com.

KADONATION uses its best efforts to protect the confidentiality and security of your personal data. In case of violation of your personal data, KADONATION undertakes to notify the Data Protection Authority without delay and, if possible, not later than 72 hours after becoming aware of such violation.

KADONATION shall in no event be liable for any direct or indirect damages that result from a wrong or illegal handling by third parties.

10. UPDATES

We are entitled to update this Privacy Policy by posting a new version on the Website whereby we will indicate the revision date at the top of this Privacy Policy. 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. In case of significant changes to the Privacy Policy that results in KADONATION using your personal data in a manner materially different from that stated at the time of the collection, we will send you a notification.

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11. NOTIFICATIONS AND QUESTIONS

Notifications under this Privacy Policy (such as, exercising your rights as a data subject) and/or any questions or concerns with regard to the provisions of this Privacy Policy must be directed at our DPO, via compliance@kadonation.com.

DPO
Name: Deloitte Accountancy BV/SARL
Email: compliance@kadonation.com
Company number: BE 0443.578.822
Address: Luchthaven Brussel Nationaal 1 J, 1930 Zaventem, Belgium

12. COMPLAINTS?

You are not satisfied with the manner in which we collect, store or otherwise treat or secure your personal data? We are sorry to hear that and are prepared to take all measures to remedy this situation. Please do contact us!

You also have the right to lodge a complaint with the supervisory authorities mentioned below or the data protection authority of (i) your residence or (ii) your workplace) should you consider that the processing of your Personal Data infringes the Privacy Legislation. The contact details of the Belgian and Dutch Data Protection Authorities are:

The Belgian Data Protection Authority
Email: contact@apd-gba.be
Telephone number: +32 (0)2 274 48 00
Address: Rue de la Presse 35, 1000 Brussels, Belgium

The Dutch Data Protection Authority
Telephone number: +31 (0)70 888 85 00 *(business related question)* / +31 (0)88 1805 250 *(privacy question)*
Postal Address: PO box 93374, 2509 AJ Den Haag, the Netherlands

13. RELEVANT LINKS TO RELATED DOCUMENTS

You can consult our **Cookie Policy** here: https://kadonation.com/en/cookie-policy.

You can consult our **General Terms and Conditions (B2B and B2C)** here: https://kadonation.com/en/terms-conditions