

This privacy statement is intended for everyone who shares personal data with us in one way or another. We want to explain to you in clear language what personal data we process and how we do this.

As you may expect from us, transparency is very important to us and we respect your privacy. We are committed to complying with all European and national data protection laws. Therefore, we endeavour to provide you with an opportunity to review this privacy statement before you share personal information with us.

Who is Kadonation and what do we do?

Through the website <https://www.kadonation.com>, our private and business customers can purchase Kadonation gift vouchers and redeem them at our gift partners. Friends, family or colleagues can also easily set up a group gift together, contribute to it and give it forward. Our business website <https://www.kadonationservices.com> enables our business customers to request more information about our B2B services, such as brochures and offers. For our business customers, we also provide Kadonation Select, which is a platform that streamlines and automates employee appreciation. We are the data controller for our activities at www.kadonation.com and www.kadonationservices.com. When executing a business order, we act as a data processor. The scope of this privacy statement is limited to our activities as data controller. You can read more about our data policy as a processor in our data processing policy.

These are our contact details:

Kadonation NV

Gordunakaai 61

9000 Ghent

Belgium

e-mail: contact@kadonation.com

Phone number: +32(0)9 396 32 00

VAT number BE0666.820362

Which data do we collect and process?

Private customers

In order to purchase a Kadonation gift voucher, redeem it or start a group gift, we ask you to create an account. This is necessary so that you can manage your group gift and your vouchers. To create your account, we ask for the following personal data:

- Name and first name
- E-mail address
- Country of residence
- Date of birth
- Login password: this is encrypted (hashed) and invisible to us

A phone number is optional, although this may come in handy if we receive an email delivery failure with a Kadonation gift card that you sent to yourself or another recipient. A date of birth is required by our payment provider. A home address is not required.

When giving a Kadonation gift card or starting a group gift, you can personalise or fill in the following **optional** fields:

- "From" and "to" when giving a Kadonation gift voucher
- Personal message for the receiver of a Kadonation gift voucher
- The receiver, the occasion and a description of the group gift
- A message for the invited contributors
- A personalized url of the group gift
- A photo of your choice with the group gift
- Updates on the group gift
- A personal message for the recipient when contributing to a group gift

You can also contribute to a group gift without an account. In that case, we only need your name and e-mail address. When you contribute to a group gift, you can choose whether your name and your contribution are visible to the other contributors or not.

When signing up with "Single Sign-on" via Facebook and/or Google (or other social media), their respective Privacy Policies are also relevant.

Business customers

We reach our business customers through our website <https://www.kadonationservices.com>. On this website, they can download brochures, request quotes and gather other information about our services. Business customers and prospects are HR professionals or people with decision-making powers in the HR department of small, medium-sized and large companies. We may collect the following information from business prospects and customers:

- Name and first name	- VAT number
- E-mail address	- Address
- Company name	- Phone number

The information we request from you is always in line with the purpose. For example, if you wish to receive a brochure by e-mail, we will only ask for your name and e-mail address. A telephone number is optional in that case, so that we can ask your opinion on the brochure, or how we can adapt our service to your wishes. On the other hand, to request an offer, all of the above information is required.

The personal data that we process as a processor (e.g. the personal data of the employees of our business customers who will be receiving a gift card) are not in scope of this privacy statement. You can find more information about our policies as a processor in our Data Processing Policy.

Small business orders (< 500 vouchers) can be placed via the website <https://www.kadonation.com> or <https://www.kadonation.com/nl/business/shop>, in which case we ask for the following data:

- Name and first name	- VAT number
- E-mail address	- Billing address
- Company name	- Phone number (optional)
- Shipping address (in case of physical Kadonation gift cards)	

Personal data provided to the customer service

Our customer service department will only ask for the personal data that is necessary to answer your question or resolve your complaint. It is possible that our helpdesk keeps information about your question or complaint so that we can improve our service. These data are not used for any other purpose.

Business partner

Should you have a commercial relationship with Kadonation, such as a supplier, vendor or gift partner, we will collect the following data:

- Name and first name	- Company address
- Company name	- VAT number
- E-mail address	- Phone number

Why do we process this data?

As a private customer, we need your personal data to create your personal account and to provide the services you request from us. We may send you emails to guide you through the group gift process (for example, if contributors have not yet been invited, we will show you how to do so). We only send newsletter when you have given your explicit consent to receive newsletters. Newsletter are limited to about five newsletters a year. You may see Kadonation advertisements on social media channels, please see our cookie policy for more information.

As a business *prospect*, we need your personal details to contact you in case you show an interest in our services, provided you have given us your consent to do so. As a business *customer*, we need your details for invoicing, customer services and fulfilling your order or setting up a Kadonation Select account. We may also inform you of similar services that we believe might be of interest to you. Should we receive your contact details via a third party, we will inform you in accordance with Article 14 of the GDPR. This means that we will inform you that we have stored your contact details in our system so that you can exercise your right to object if you consider this necessary.

Overview of our lawful grounds:

The law states that personal data may only be used for a reason described in the privacy legislation. Such a reason is called a lawful ground. All lawful grounds are listed in Article 6 of the GDPR. These are the lawful grounds that apply to our activities:

<u>Processing activity</u>	<u>Purpose</u>	<u>Lawful ground</u>
B2C: Creation of a Kadonation account	Operational and customer management	Legitimate interest
B2C: Informative communication about requested services	Customer support	Legitimate interest
B2C: Inform existing customers about similar services	Marketing	Legitimate interest
B2C: Sending newsletters	Marketing	Consent
B2B: Creation of a Kadonation Select account	Customer management and service	Contractual necessity
B2B: Marketing communication to business prospects via e-mail	Marketing	Consent
B2B: Personal contact with an HR professional (e-mail or phone)	Customer management	Legitimate interest
B2B: Marketing communication to existing customers about similar services	Marketing	Legitimate interest
B2B: Storage of contact details of business prospects	Customer management	Legitimate interest
B2B: Storage of contact details of business customers	Customer management	Contractual necessity
Invoicing and transaction management	Operational and customer management	Contractual necessity
Retention and processing of supplier data	Operational management	Contractual necessity

How long do we keep your personal data?

The retention periods vary according to the service provided. We do not keep your data longer than necessary for the purposes for which it was collected and processed, or as long as necessary to fulfil our legal, contractual and judicial obligations.

For private customers, the following retention periods apply:

- We will remove any Kadonation.com account in which no activity has been observed for 5 years, no group gift nor activated voucher has been linked to it. We will notify you 1 month in advance, giving you the chance to keep your account if you wish. We have to keep an account with an activated Kadonation gift card indefinitely, as your Kadonation gift card is valid for life. If we would delete your account, you would lose the credit. Should you wish to have your account deleted yourself, you can do so by contacting us and expressing your objection.
- In the case of a closed group gift, the e-mail addresses of contributors who have contributed without an account will be stored for 5 years. The group gift itself is kept for as long as you wish. In addition to the credit, it contains personal messages or reminders addressed to you. We will not delete this without your permission.

The following retention periods apply to business prospects and customers:

- Contact details of business prospects are not kept for more than 5 years after the last contact. We apply this retention period as our contacts are limited (e.g. end-of-year gifts) and agreements within the framework of employee evaluation often run for several years.
- Contact data of business customers is kept for the duration of the contract and for 2 years after the contract ends. Personal data used for invoicing and bookkeeping purposes is kept for the statutory retention period of 7 years.

Applicants: If you apply for a job with us, we will only use the personal data you provide for our internal recruitment purposes. We will keep your correspondence, profile, CV and motivation letter for a maximum of 1 month so that we can efficiently handle any job applications within the organisation. If there is a chance that we might have a position for you in the future, we will keep your data for 1 year, provided we have your explicit permission.

Suppliers and vendors: Contact details of our suppliers, vendors and gift partners are deleted at the end of our cooperation.

In the context of fraud prevention, we are in some cases legally obliged to request identity data. These will be deleted immediately after they have been transmitted to the competent authorities.

Do we transfer your data?

First of all, we never sell any personal data to third parties. Sometimes it is necessary for us to pass on personal data as part of our service, for example to Google Cloud who hosts our

database or a printing company in the case of physical Kadonation gift vouchers. We ensure that your personal data remains within the EEA (European Economic Area) as much as possible. We will only pass on your personal data to parties based outside the EEA if the country offers an adequate level of protection according to the European Commission or if the necessary contractual arrangements are been made as required by the data protection authority.

What are your rights as a data subject?

Everyone has a number of privacy rights. For example, you can ask us which of your personal data we process. And if the data is incorrect, you can have it corrected. In some cases, you can also ask us to delete, transfer or limit the processing of your data. And if we process your data with your consent, you can always withdraw your consent.

1) Right to be informed

You have the right to know why we need your data, for how long we keep it, to whom we transfer it and on what lawful ground we process your data. We have collected all this information in this privacy statement. In case you have some remaining questions, please do not hesitate to contact us:

Kadonation NV, Gordunakaai 61, 9000 Ghent, Belgium

E-mail: contact@kadonation.com

Phone number: +32(0)9 396 32 00

2) Right of access to the personal data we hold about you

You have the right to inspect the data we hold about you at any time. This way you can check whether your data is correct. To do so, you can send us an e-mail at contact@kadonation.com.

3) Right of rectification, completion or update of your personal data

You may change your data at any time, for example in case you have a new e-mail address. Or in case any of your data is no longer relevant to us. To do so, you can send us an e-mail at contact@kadonation.com.

4) Right to portability of your personal data

You may ask us to provide your data in a portable format so it can be transferred to another organisation. To do so, you can send us an e-mail at contact@kadonation.com.

5) Right to withdraw your consent

Have you given us permission to process your data in the past? You may withdraw your consent at any time. Without further explanation. To do so, please send us an e-mail at contact@kadonation.com.

6) Right to the deletion of your personal data ("the right to be forgotten")

You may ask us to delete your data from our database. GDPR legislation provides for the following situations in which you can exercise this right:

- if you no longer give us permission to process your data
- If your data is no longer necessary for our operation
- If your data is obtained without your explicit consent
- If your data is obtained when you were underaged
- If we are legally obliged to do so, for example, following a complaint.

To exercise this right, please send us an e-mail at contact@kadonation.com

7) Right of objection to the processing of your personal data

You may ask for your data not to be used, unless there are compelling reasons for doing so. You may also object to automated decision-making. To exercise your rights, please send us an e-mail at contact@kadonation.com.

8) Right to restrict the processing of your personal data

You can limit the processing of your data if:

- (1) You dispute that your data is correct. For example, you can put the processing of your data on hold until your data is corrected.
- (2) Your data has been obtained unlawfully. For example, you can ask us to keep your data, but to limit the use of it.
- (3) We no longer need your data. For example, you can ask to keep your data because you need them for a determination, exercise or defense for a court of law.

To exercise this right, please send us an e-mail at contact@kadonation.com.

9) Right to lodge a complaint to a supervisory authority

If you have a comment or a complaint about the way we handle your personal data, we will be happy to make time for you. We will always strive to find an appropriate solution as quickly as possible. You can contact us via contact@kadonation.com and/or privacy@kadonation.com or by the phone +32(0)9 396 32 00. In case you feel that we cannot provide an adequate solution for you, you have the right to submit a complaint to the competent supervisory authority:

Gegevensbeschermingsautoriteit

Drukpersstraat 35

1000 Brussels

Tel +32(0)22744800

e-mail: contact@apd-gba.be