

A network diagram background consisting of a complex web of interconnected nodes and lines. The nodes are represented by small blue and orange dots, and the lines are thin grey lines. The diagram is more dense in the top right and bottom left corners, with a large white wavy shape in the center.

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Privacy Policy

**Smart and Easy NV
("Contract.fit")**

2019-11-22



SCOPE OF THIS PRIVACY POLICY

This Privacy Policy describes how SMART AND EASY collects, uses, consults, retains or otherwise processes your personal data as a Customer when you are using our website or using our services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY!

This Privacy Policy applies on the basis of EU Regulation 2016/679 *on the protection of natural persons with regard to the processing of personal data* (the “**GDPR**”), as well as any legislation and/or regulation implementing or enacted pursuant to the GDPR and current and future e-Privacy legislation.

Terms defined in article 4 of the GDPR shall have the meaning as defined therein.

For the purpose of this Privacy Policy, “**Services**” means (without limitation) access to the SMART AND EASY online software platform as a service (SaaS) and any other data (such as API keys), information or documentation provided by SMART AND EASY to you within the scope of these Services.

You will be afforded the rights based on the GDPR irrespective of your nationality within the territorial scope of the GDPR and related privacy legislation.

These rights are set out below.

As a rule, your personal data is only retained for as long as is required to fulfil the activities set out in this Privacy Policy, for as long as otherwise communicated to you in this Privacy Policy or for as long as is permitted by applicable law. By way of example, we may have to retain some of your personal data if you want to use our Services even on a “free trial” basis.

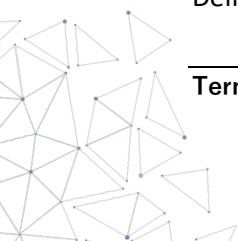
To determine the appropriate retention period of your personal data, due account is taken of the amount, nature, and sensitivity of your personal data, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which your personal data is processed (if processing is at all required for the purposes) and the applicable legal requirements.

IMPORTANT NOTE: SMART AND EASY does NOT store any personal data which you process using our Services (which are rendered by making our SaaS platform and API available to you as a current or prospective customer). Any such personal data is only present on our platform on a transient basis following processing at your request and will be permanently and irrecoverably deleted and erased after processing.

The only personal data that we store and retain relate directly to you and your business as Customer and is required for us to perform the Services and/or invoice for the Services in connection with your use of the Services.

Some of your personal data may be processed for analytical and statistical purposes in order for us to measure, improve and better tailor the quality of our services.

SMART AND EASY NV is a Belgian corporation with its registered office at Nieuwgoedlaan 51, 9800 Deinze, BELGIUM with company number 0646.697.416.





1. Your Rights pursuant to EU law and this Privacy Policy

EU privacy regulation (most notably the GDPR) grants specific rights, summarized below, which you can in principle exercise free of charge.

In some cases, these rights may be limited e.g. if your personal data has to be retained on the basis of local applicable law or if you request the deletion of personal data which is required to complete the contract with you.

Your personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the controller(s) legitimate interests in compliance with applicable laws.

In addition, your personal data may be shared with a successor to all or part of our business when this is in our legitimate interests in facilitating a business sale and in this context our business interests prevail. By way of example, if parts of our business or assets are sold (including assets), personal data may be shared as part of that transaction, subject to applicable law.

To exercise any of your rights set out below, you can file a request via email at:

privacy@contract.fit

Please note that if you have unresolved concerns, we would appreciate it if you would inform us of any such unresolved concerns using the same e-mail address.

You do however have the right to file a complaint with the data protection authority of your country of residence or of the country wherein you believe a breach may have occurred (to the extent that these data protection authorities are competent to handle your complaint).

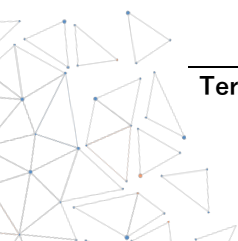
1.1. Right to withdraw your consent

If your consent is the basis for processing of your personal data, you will be able to withdraw that consent at any time you want, either by logging in to your account on our website (if you have created an account) and changing your privacy settings or by expressing your intent to withdraw consent by e-mail to: **privacy@contract.fit**.

Similarly, you can withdraw your consent by unsubscribing to certain services, usually by clicking on a hyperlink in an e-mail addressed to you.

Please note that the withdrawal of your consent will not affect the lawfulness of the collection and processing of your personal data based on your consent up until the moment where you withdraw your consent.

Moreover, withdrawing your consent is only effective to the extent that the processing of your personal data is happening only on the basis of your consent and is not based on another ground such as a legal requirement.





1.2. Right to access and rectify your personal data

You have the right to access, review and rectify your personal data. You therefore have the right to obtain the rectification of inaccurate personal data or to complete incomplete personal data.

You are entitled to request a copy of your personal data, to review or correct it if you wish to rectify any personal data like your name, email address, passwords and/or any other preferences. As a rule, this can be achieved by logging in to your account on our website (if you have created one) or by contacting us at : privacy@contract.fit

Please note however that there may be legal requirements imposed by applicable law which may prevent us from changing personal data when the requested change does not match up with official documentation.

For obvious reasons, we cannot grant you access to personal data of somebody else unless you can demonstrate that you are the legal guardian of said person and local law implementing the GDPR (if any) does not preclude you from having access to personal data of this third party even if you are the legal guardian.

1.3. Right to erasure of your personal data (*“right to be forgotten”*)

You have the right to request deletion and erasure of your personal data which is processed as described in this Privacy Policy in case this personal data is no longer needed for the purposes for which it was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies (such as the performance of the contract concluded with you or legal requirements imposed by applicable law).

If you wish to exercise your right to erasure, please send an e-mail to this effect to: privacy@contract.fit

1.4. Right to restriction of processing of your personal data

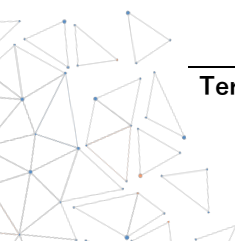
Under certain circumstances, you may ask us to restrict the processing of your personal data.

You can do so when you wish to rectify your personal data pending the verification of the accuracy of your personal data by the data controller.

You can also do so when you want to prevent erasure of your personal data because you need this personal data for the establishment, exercise or defense of a legal claim.

You can also do so when you object to the processing of your personal data pending the verification of whether or not the legitimate interests of the data controller override your right to object.

If you wish to exercise your right to restrict processing, please send an e-mail to this effect to: privacy@contract.fit





1.5. Right to object to processing of your personal data

Under certain circumstances, you may object to the processing of your personal data, most notably when your personal data is processed solely for direct marketing purposes.

If you wish to exercise your right to object, please send an e-mail to this effect to: privacy@contract.fit

1.6. Right to personal data portability

Where you have provided personal data and where the processing is carried out by automated means and based on your consent or the performance of the contract concluded, you have the right to receive the personal data processed about you in a structured, commonly used and machine-readable format and to transmit this personal data to another “service provider”.

If you wish to exercise your right to data portability, please send an e-mail to this effect to: privacy@contract.fit

2. INFORMATION RELATED TO SPECIFIC PROCESSING ACTIVITIES

We will collect personal data required for the performance of any Services using our website (including website forms which are presented to you).

This may require processing of your personal data for the purpose of handling and setting up an account or log-in to enable access to the Services and any invoicing related thereto.

Processed data categories

Address, Email address, First name / Last name, details relating to the Services you require, Mobile phone number, VAT number, IP address and any other personal data you entered into website forms.

Source of personal data

Directly from you through input in the website form

Ground for processing

Ad hoc consent obtained through the website form

Required for performance of the Services

Recipients of personal data

- SMART AND EASY NV
- Cloud service providers



3. Security Measures: How we Protect your Personal Data

Appropriate technical and organizational measures are implemented in order to ensure an appropriate level of cybersecurity of your personal data, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.

These technical and organizational measure include pervasive encryption techniques, secure off-site backups, , regular penetration testing, physical and IT system access controls on a “need to know” basis, activity logging and confidentiality obligations imposed contractually on both staff and third parties.

Specifically, SMART AND EASY is going through the process of ISO 27001 certification.

Appropriate technical and organisational measures are taken to ensure that, by default, only personal data which are necessary for each specific purpose of the processing are processed.

In the event personal data is compromised as a result of a personal data breach, the required notifications will be made pursuant to applicable law.

Summary of security measures that are put in place by SMART AND EASY

Overview: Smart and Easy implements a multi-layered defense on user-level with the following properties

- External user: can only retrieve personal data when properly authenticated and in possession of uuid
- FrontEnd users: can only accept strictly validated user input (write, cannot read self-generated content), serve content generated by BackEnd through uuid (read), and escalate privileges to BackEnd user through clearly defined access points
- BackEnd users: with uuid, can read input written by the FrontEnd and write the “analysis-specific” content for FrontEnd
- Server root: will have access to the temporarily stored personal data and can change behavior of FrontEnd and BackEnd users. Should still not be able to compromise the integrity of other servers, the code base, ...
- Developer: has access to the codebase, does not have access to live servers
- Administrator: has full access to all keys and passwords

Roles and permissions

- Principle of least privilege

Keys and passwords

- Unique per service, environment, need to know basis



Minimize attack surface and strict input validation

- Limited set of endpoints, all entry points implement strict user input validation and file sandboxing

Privilege escalation

- Exhaustively listed handover points between users, protected by strict input validation

Network security and firewall

- Only https connections allowed, ssh closed during maintenance, no public ip address for individual servers
- Rules enforced on different levels (network security group, load balancer, and firewall)

Secure development life cycle

- Four eye principal on code defined as 'security-sensitive'
- Ensure latest security patches are always deployed (unattended updates)

Intrusion detection

- Monitoring at different levels

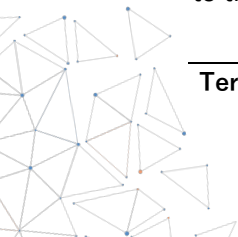
4. International Transfers of Personal Data

If you are in the European Economic Area (EEA), the data collected from you as described in this Privacy Policy may be transferred to and stored at a destination outside the EEA, including for the purpose of processing personal data by selected processors, in order to facilitate business. These transfers are however strictly limited to the extent technically possible unless the personal data is transferred to a country which has been deemed to ensure an adequate level of personal data protection by the European Commission.

Countries outside the EEA may however not have laws which provide the same level of protection to your personal data as laws within the EEA. Where this is the case, appropriate safeguards will be put in place to ensure that such transfers comply with the GDPR, as a rule by putting in place Standard Contractual Clauses approved by the European Commission as ensuring an adequate protection or if no standard contractual clauses exist, as a last resort, by ensuring that the transfer is done to an organization that complies with the privacy shield mechanism in case the transfer is made to the United States of America.

5. Changes to this Privacy Policy

SMART AND EASY and its affiliates reserve the right to modify and update this Privacy Policy from time to time. Any relevant changes will be brought to your attention (either by e-mail or via our website)





For additional information and inquiries, please reach out via info@contract.fit

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