

PRIVACY POLICY

1. Identity and contact information of the data controller

This privacy policy applies to all personal data processed by Eyefine BV, with its registered office at Rosteynedreef 9, 9880 Aalter, with VAT number BE0778.706.201, who is the data controller of this website.

The Data Controller places great importance on your privacy and processes your personal data in accordance with the European Regulation 2016/679 of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data (hereinafter "GDPR"), as well as any future or additional legislation implementing it, as applicable.

For further questions or comments regarding how we handle your personal data, you can always contact us, either by email at privacy@eyefile.be or by mail to the aforementioned postal address.

In the context of our main activities, which involve the development of software for eye specialists, we act as a processor of the personal data processed through our offered software by our clients. For this reason, if you have any questions, complaints, or wish to exercise your rights regarding this data, you should contact the relevant data controller directly.

Our Data Protection Officer, Mr. Franklin BV (<https://www.misterfranklin.be/dpo>), can also be reached through the same contact information (mention "Attention: DPO").

2. What does "processing personal data" mean?

Processing personal data (hereinafter "data") includes any processing of data that can identify you as a natural person. You can find information about the specific data involved in this Privacy Policy. The term 'processing' is broad and includes activities such as collecting, storing, using your data, or sharing it with third parties.

3. What data do we process?

Below, we clarify the types of data we may process from you. Depending on the specific situation, your preferences, and how you contact us, we may not process all of the following data from you:

- **Customer Data:**
 - Contact information, registration data
 - Login information, password
 - Logging
 - Billing information, payment data

- Communication data
- Contracts
- **Service Providers:**
 - Contact information
 - Contracts
 - Billing information
 - Communication data
- **Marketing Purposes, Newsletter, Website:**
 - Data processed as a result of cookies (see cookie policy)
 - Contact information

4. On what legal grounds do we process your data?

We process your data for the purposes described below and only collect and process the types of data necessary for these purposes.

We process your data only to the extent based on one of the processing grounds listed in the GDPR, as outlined below.

- **Legal Obligation**

Certain data is processed by us to comply with legal or regulatory obligations that apply to us. For example, in the context of tax and accounting obligations or data protection.

- **Necessary for the Performance of a Contract**

Certain data is processed by us because it is necessary for entering into, executing, or terminating a contract with you as the data subject. For example, for contacting, scheduling, responding to a request, or obtaining information in the context of entering into a contractual relationship, but also for the effective execution of the contractual assignment within the scope of our main activity, in order to provide you with our services or receive yours.

- **Legitimate Interest**

Certain data is processed by us based on our legitimate interests, which in specific cases outweigh any potential harm to your rights. For example, for sending newsletters to existing customers regarding similar products/services; promoting our activities to business contacts; improving the quality of our services; training employees; evaluating and maintaining data and statistics related to our activities, broadly defined; preserving and using evidence in the context of liability, proceedings, or disputes; and ensuring security, both online on this website and in our company premises.

- **Consent**

Certain data is processed by us based on your consent. For example, for promoting activities to potential business contacts; using certain analytical or marketing cookies; posting photos containing personal data on our website and social media channels. Data of job applicants after the recruitment process will be retained only with consent.

5. Origin of the data

Most of the data we process from you is obtained directly from you. In the context of our services, it is possible that we obtain data from you through external service providers or public sources.

6. Who do we share your data with?

We do not disclose your data to third parties unless strictly necessary for the purposes mentioned above or if we are legally obligated to do so.

Where necessary, we rely on external service providers (processors) to support our operational purposes, such as managing our websites and IT systems. These external service providers may carry out certain data processing on our behalf, as needed for the respective purpose. They are not allowed to use the data for other purposes. Furthermore, these service providers are contractually bound to ensure the confidentiality of your data through a "data processing agreement" concluded with them.

Specifically, this means that we may share your data, to the extent relevant to your situation, with the following third parties for the following purposes, where these third parties act as processors on our behalf:

- Sponsors (with your consent);
- Postal companies, transport and delivery companies if we need to send you something by mail;
- Payment service providers if we receive payments from you, or vice versa;
- External representatives and consultants or any other parties involved in our main or ancillary activities;
- The processors who assist us in IT matters in operating our organization, with a view to secure and efficient digital data management within our organization;
- Government bodies, judicial authorities, and practitioners of regulated professions such as accountants and lawyers, for compliance with our legal obligations and defense of our interests, as required.

7. How long do we retain your data?

We do not retain your data for longer than necessary for the purpose for which the data was collected or processed. Since the retention period for data depends on the purposes for which the data was collected, the storage period may vary in each situation. In some

cases, specific legislation may require us to retain the data for a certain period. Our retention periods are always based on legal requirements and a balance between your rights and expectations with what is useful and necessary to fulfill the purposes. After the retention period expires, your data will be deleted or anonymized.

8. Where do we store your data and how is it protected?

We implement appropriate security measures on a technical and organizational level to prevent the destruction, loss, falsification, alteration, unauthorized access, or unlawful disclosure to third parties of your data within the scope of our activities.

Additionally, we also ensure that the processors we rely on take appropriate security measures to minimize the risks of incidents.

If your data is processed outside the European Economic Area (EEA) when using specific services or software tools, this will only occur in/to countries that the European Commission has confirmed as providing an adequate level of data protection for your data, or measures will be taken to ensure the lawful processing of your data in these third countries.

9. What are your rights?

You have various rights regarding the data we process about you. If you wish to exercise any of the following rights, please contact our GDPR officer using the contact information provided in the first section of this Privacy Policy.

- **Right of Access and Copy**

You have the right to access your data and obtain a copy of it. This right also includes the ability to request further information about the processing of your data, including the categories of data processed and the purposes for which it is processed.

- **Right of Correction or Rectification**

You have the right to have your data corrected if you believe we have incorrect data.

- **Right to Erasure (Right to Be Forgotten)**

You have the right to request that we erase your data without undue delay. However, we may not always be able to comply with such a request, especially when we still need the data for an ongoing contract or when retaining certain data for a specific period is legally required.

- **Right to Restrict Processing**

You have the right to restrict the processing of your data. This temporarily stops processing until there is certainty about its accuracy, for example.

- **Right to Withdraw Consent**

If the processing is based on your consent, you have the right to withdraw this consent at any time by contacting us. For marketing emails you receive from us based on your consent, you can easily withdraw this consent by clicking the unsubscribe link at the bottom of such a message.

- **Right to Object**

You have the right to object to the processing of your data based on legitimate interest. This should be based on specific reasons related to your situation. You can also object to the use of your data for direct marketing. Marketing emails will always include an opt-out option.

- **Right to Data Portability**

You have the right to obtain your data that you provided to us with your consent or in the performance of a contract in electronic form. This allows for easy transfer to another organization. You also have the right to request that we transfer your data directly to another organization, if technically feasible.

- **Right to Lodge a Complaint with Your Supervisory Authority**

If you believe that we are processing your data incorrectly, you always have the right to lodge a complaint with your data protection supervisory authority.

Belgian Data Protection Authority (DPA)
Drukpersstraat 35
1000 Brussels
contact@apd-gba.be

10. How can you exercise your rights?

You can exercise your rights by contacting us, either by email at privacy@eyefine.be or by mail at Rosteynedreef 9, 9880 Aalter, including a copy of the front of your identity card or another document by which you can be identified. The copy will only be used to identify you in accordance with the GDPR.

11. Changes

We reserve the right to change this Privacy Policy. The most recent version is always available on our websites. The date on which this Privacy Policy was last modified can be found at the top. In case of a substantial change to the Privacy Policy, we will inform those affected, if possible, directly.