

Version 2.1, dated 3 May 2023

PRIVACY POLICY

1. We respect your privacy

Within the scope of its activities, Lansweeper NV, a limited liability company existing under Belgian Laws with registered address at Belgium, 9820 Merelbeke, Fraterstraat 212 and registered under enterprise number 0538.668.417, and its affiliates (“**Lansweeper**”), collects and uses information about natural persons (also known as “**personal data**”).

At Lansweeper we value and respect your privacy and the security of your personal data. That is why we strive to process your personal data in strict compliance with the applicable legislation on personal data protection (including the General Data Protection Regulation or “**GDPR**”).

This privacy policy sets out how Lansweeper processes your personal data when you use the Lansweeper website, use our Lansweeper products and services, or in any other way interact with Lansweeper. Supplemental transparency may be provided, through *e.g.* disclaimers, electronic means or orally.

Lansweeper is committed to ensuring that your privacy is fully protected. Should we request you to provide certain information by which you can be identified when using our product, you can be assured that it will only be used in accordance with this privacy policy.

Within the scope of our commitment to protect your privacy and the security of your personal data, we wish to explain in all transparency:

- what our role as controller of personal data comprises of;
- which personal data we process and how we collect it;
- why we collect, use and save personal data; and
- what your rights and our obligations are in this respect.

2. The controller of your personal data

For the purposes of this privacy policy Lansweeper acts as the **controller** of your personal data. This means that Lansweeper decides why and how your personal data is collected and used. Lansweeper may process personal data (i) in its capacity of the company whom your employer or contractor has developed a contractual relationship with (*i.e.* in the case of representatives/contacts of Lansweeper’s prospects, customers and suppliers who are natural persons), or (ii) in the capacity of the operator of Lansweeper owned or managed websites (*i.e.* in the case of visitors of said websites), or (iii) as otherwise provided in this privacy policy. Where Lansweeper acts as the controller of your personal data, such data processing shall take place in accordance with this privacy policy.

In some cases Lansweeper might act as a **processor**, meaning that it processes personal data on behalf of another controller (*e.g.* personal data Lansweeper may process as a result of the provision of its products such as IT asset data related to natural persons). If your personal data is processed by Lansweeper as a processor on behalf of such other controller, please refer to the privacy policy of that controller for more information. Where Lansweeper acts as the processor of your personal data and to the extent applicable data protection legislation applies to such personal data Lansweeper allows data controllers to enter into a data processing addendum (“DPA”) with Lansweeper.

In limited cases Lansweeper may act as a **joint-controller** with another controller for the processing of your personal data. In such case Lansweeper and the other controller jointly determine why and how your personal data is collected and used based on an arrangement made between themselves concerning their respective responsibilities.

- Facebook Ireland is a joint controller of the personal data processed through the Facebook Page Insights service. Further information on how Facebook Ireland processes Personal Data, including the legal basis Facebook Ireland relies on and the ways to exercise Data Subject rights against Facebook Ireland, can be found in Facebook Ireland’s Data Policy at <https://www.facebook.com/about/privacy>.

- Facebook Ireland and Lansweeper have entered into an arrangement to determine their respective responsibilities for compliance with the obligations under the GDPR.
- Facebook Ireland and Lansweeper have agreed that Facebook Ireland is responsible for providing you with information about the processing for Page Insights and for enabling you to exercise your rights under the GDPR. Under the GDPR, you have the right to access, rectify, port, delete and object to and restrict processing of your data. Learn more about these rights in your Facebook settings. You can also contact Facebook Ireland's data protection officer whose contact details can be found in Facebook Ireland's Data Policy.
- Facebook and Lansweeper have agreed that the Irish Data Protection Commission is the lead supervisory authority responsible for overseeing the processing for Page Insights (exceptions might apply where the Page admin is a public authority). You always have the right to lodge a complaint with the Irish Data Protection Commission (please see at www.dataprotection.ie) or with any other supervisory authority.

3. Which personal data are processed and how are they collected?

We may process following types of personal data:

- Identification and contact data;
- Social data and habits;
- Social network data;
- Professional data;
- Financial and economic data;
- Payment information;
- Connection data;
- ID-data issued by government;
- End-user product usage data;
- Any other information you choose to provide.

Personal data are obtained by Lansweeper in various manners:

- **You provide** some of it directly in various manners. We collect personal data about you when you purchase or sign up for our product and services, register for an account, create or modify your profile, set your preferences, complete our contact forms, participate in contests or similar promotions, respond to surveys, make payment transactions, use our community and support services, etc. We may require you to provide us with information for contractual or legal reasons. If you do not provide personal information when requested, you may not be able to use our services if that information is necessary to provide you with the service or if we are legally required to collect it.
- **We record** some of it automatically when you use our services, website or social media pages and technologies linked thereto. We collect information about your activity on and interaction with the services, such as your IP address(es), your device and browser type, the web page you visited before coming to our sites, what pages on our sites you visit and for how long, and other identifiers associated with your devices. For more information, please read our [Cookie Declaration](#).
- **We may record** personal data: (i) in case you call Lansweeper, we may record the conversation for quality management purposes within our call centre, in which case such recordings will be maintained for the duration as permitted by applicable law; or (ii) in case of conference calls. In both cases, we undertake to let you know via a beep or automated message that we record the call.
- **We may receive** some personal data from third parties:
 - If you make a purchase, we obtain limited information about your payment card from our payment service provider.
 - If you have provided your personal data to us, according to one of the bullets above, as a contact person for a Lansweeper customer or prospect, we may collect or receive additional professional personal data about you from third parties for customer data enrichment purposes. Such professional personal data means without limitation: your name, your email, your address, your time zone, your employer's information, your employment title, your employment role, your LinkedIn-profile, etc.
 - We may receive your personal data directly from your employer or from the company you are in any other way engaged with.
 - We may receive your personal data from our partners, agents, distributor, reseller or affiliates, when they have provided or offered you Lansweeper products and services.

In the events described above, please refer to the privacy policy of the relevant third party for more information.

4. What do we process your personal data for?

We always process your personal data for a particular purpose. We only process the data that are necessary for achieving that purpose. More specifically we process personal data for the following purposes:

- **Analytics:** We may use your personal data for scientific research, market research & statistical research. This may include analytics related to interactions with our social media pages, our products or our services.
- **Complying with law:** We may use your personal data for compliance with applicable legal requirements, such as tax and other government regulations and industry standards, contracts and law enforcement requests.
- **Contests or similar promotions:** When you participate in an action or contest, we will ask personal data such as your name, address and email address. This way we can execute the contest and contact and announce the laureate(s) and allows us to also measure the response to our advertising actions.
- **Customer support:** You can call or email us. In order to make sure that we can help you as quickly as possible, we make use of the data you provide us with and we may make notes that we save.
- **Direct marketing and public relations:** We only provide you with direct marketing communication (e-mail, push notifications, etc.) when: (i) we or a third party have obtained your consent (e.g. through a checkbox or webform); (ii) where we have a commercial and/or contractual relationship (e.g. you are a (trial) customer, you have downloaded one of our documents, etc.) and Lansweeper has a legitimate interest to provide you related direct marketing communication. Our direct marketing e-mails make use of tracking cookies, to understand your needs and provide you with better service and internal record keeping. For more information please read our [Cookie Declaration](#).
- **End-user analytics:** Lansweeper may process end-user product usage data for analytics & research-, product/service improvement-, and product/service personalisation purposes, including making use of profiling.
- **Enforcement:** For enforcement of our Terms of Use and other legal terms or policies.
- **Improvement of our products and services:** We are continuously searching to improve our services. To this effect we may use your personal data to ask you to participate in a customer or market survey, product feedback survey, etc. Sometimes third parties carry out those surveys. We may collect data for bug management purposes, in order to be able to track and revert back to end-users.
- **Management and improvement website:** We use the personal data of the persons visiting our website to manage and improve the website, as well as to analyse the use thereof.
- **Management of customers, suppliers and partner programmes:** We store the contact details of our business customers and partners to manage the relationship with these customers and partners.
- **Profiling:** We may use your personal data, to collect additional professional personal data about you, in order to use for any of the above purposes.
- **Security and fraud monitoring:** We may process personal data to examine, prevent and fight fraud and protect our and other's interests, rights and property. If required we also communicate customer data to the competent (administrative) authorities, legal institutions or other public bodies. We also make use of CCTV in our offices.
- **Supply our products and services to customers:** To handle your order we need your contact and billing data such as email address, surname, first name, address, company, VAT ID, telephone number, card number and other billing information from licensee and billing contact. This way we can deliver your order, process payments, respond to your inquiries and keep you updated on the status of your order. If necessary for the handling of your order, we will also transmit your data to our subcontractors, for example our payment processor. In addition, as part of our services we may use your information to contact you in order to inform you about our products or services (e.g. we send you emails about your transactions and service-related announcements).
- **Recruitment:** We may process personal data of job applicants in relation to our recruitment activities, for following specific purposes:
 - learning more about the behaviour of the visitors of our careers website to improve our recruitment process and this website (device and browser, IP-address, requests and responses sent from and to your device, source website (we use a cookie to track this), acceptance of cookies (a cookie is used to store this), and behaviour on our website);
 - generating anonymized data related to the careers website, that we share with our partners; and management of job applications (any personal data that you provide through our job application form including, but not limited to full name, email address, phone number, picture, cover letter, résumé, LinkedIn profile, Indeed profile and which job you have applied for; statuses, notes and planning related to your job application; and email communication). Under European data protection law we are required to inform you that withholding personal data in your job application can give you a disadvantage in comparison to other candidates who are applying for the same role. After a reasonable period following the procedure we will

delete your personal data, unless we have informed you that we require it for other purposes or we ask your consent to maintain your data. Your personal data has to be processed by LinkedIn and Indeed to allow for the 'Apply with LinkedIn' and 'Apply with Indeed' functionalities. LinkedIn and Indeed may use cookies. You can find their privacy policies on the following websites: <https://www.indeed.com/legal> and <https://www.linkedin.com/legal/privacy-policy>.

5. How do we process your personal data?

We collect and use the personal data we have received based on your voluntary, explicit and specific consent, except when the processing is required for the execution of an agreement or for the compliance with an obligation that is imposed by law, decree, ordinance; or when the processing of the personal data is necessary for safeguarding our legitimate interest. In that case we will verify whether your interest or your fundamental rights and freedoms do not override the above. Examples of such a legitimate interest are: providing a cost-effective service, offering our products and services to our customers, fraud prevention and the protection of our IT systems and networks, compliance with our corporate and legal responsibilities.

6. With whom my personal data are shared?

In principle your personal data are only accessible to the authorized personnel within Lansweeper that need to have access to those personal data in function of their professional tasks. In any case, those personal data shall only be processed for the purposes as described in article 4.

All these members of our personnel are bound by strict internal rules and procedures with respect to the processing of personal data. They are also obliged to observe the technical and organizational measures that we have taken to protect your personal data.

In principle we do not share your personal data with anybody outside Lansweeper. Sometimes it is however necessary that for operational reasons we appeal to meticulously selected third parties within the scope of the purposes described in article 4. These recipients can only use the indicated personal data for the execution of their specific task, need to act in respect with our privacy policy and they cannot use them for any other purposes. Within the scope of performance of their tasks, the recipients are also obliged to comply with the provisions of the General Data Protection Regulation, as well as their contractual obligations towards us.

Such recipients may be located in jurisdictions outside the European Economic Area that may not guarantee an appropriate level of personal data protection. With respect to the transfer of the personal data to such jurisdictions, we shall take proper measures to make sure that the transfer is realized in accordance with the applicable rules relating to the international transfer of personal data.

Such recipients include following categories:

- Processors that assist us with payment processing;
- Processors and/controllers that provide us with additional personal data for customer data enrichment purposes;
- Processors that may assist us in collecting personal data from you, *e.g.* providers of chatbot services;
- Processors that provide market and statistical research & analysis;
- Processors that analyse how you engage with our products and services;
- Processors that provide hosting of our website and related databases;
- Processors that provide cloud and other supported software services for business processing, such as accounting software providers;
- Processors that provide communication services;
- Processors and controllers who act as a subcontractor for Lansweeper in the execution of the services that we provide you;
- Processors and controllers that act as agents, resellers or distributors of Lansweeper;
- Processors and controllers that provide professional services to Lansweeper such as accountants, lawyers and notaries;
- Companies associated with Lansweeper and its affiliates.

7. Right to oppose the use of your personal data for direct marketing purposes

You can oppose the use of your personal data for direct marketing purposes at all times. To this effect you can send an email to security@lansweeper.com or send a letter to Fraterstraat 212, 9820 Merelbeke, Belgium. This right to oppose can also be exercised through every newsletter.

8. Your rights

You shall have the right to access your personal data and to have them rectified. In some cases you also have the right to restrict or object to the processing thereof or to have them erased. You also have the right, under certain circumstances, to data portability.

To this effect you can send a request by email to security@lansweeper.com or send a letter to Fraterstraat 212, 9820 Merelbeke, Belgium. We may ask you for additional information in order to verify your identity.

When you have given your consent for the processing of your personal data, you can withdraw that consent at any time, but in that case you should be aware of the fact that you will not be able to fully enjoy all services. Such withdrawal shall not affect the lawfulness of the processing based on the consent prior to the withdrawal thereof.

If you are not satisfied with the way we process your personal data, you can inform us thereof and you have the right to file a complaint with the supervising authority that is competent for the protection of personal data.

We will not sell, distribute, or lease your personal information to third parties unless we are required by law to do so. If you believe that any information we are holding about you is incorrect or incomplete, please email us as soon as possible at the above shown address. We will promptly correct any information found to be erroneous.

9. Protection of your personal data

We take the necessary administrative, technical and organizational measures to ensure the security and confidentiality of your personal data and protect your personal data against destruction, loss, abuse, unlawful granting of unauthorized access, to the transmitted, stored or otherwise processed data, either by accident or unlawfully, which more in particular may lead to physical, material or immaterial damage.

These measures take into account the state of technology, the implementation costs, as well as the nature, the size, the context and the processing purposes and also the probability and severity of the various risks for the rights and freedoms of natural persons that are related to the processing.

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure we have put in place the suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

10. Retention of your personal data

Your personal data will be retained as long as necessary for achieving the purpose for which they were collected and in line with the legal, regulatory and internal requirements in this respect.

Comments on our community and social media: Lansweeper reserves the right to erase posts, comments, links and publications that we believe to be abusive, insulting, for marketing purposes, to discredit the market, or that entail copyright intrusion, criminal activity or similar. We also reserve the right to block users who repeatedly contravene our rules. Sharing sensitive information about other people is not permitted when publishing questions and comments on our website or social media pages. Sensitive information may include union membership, sexual orientation, religion, etc. We monitor and moderate our social media pages and our website.

11. Cookies

Lansweeper's websites, including www.lansweeper.com, make use of cookies. Cookies are small text files that are stored on the hard disk of the computer and/or devices of the visitors of certain websites. They contain certain information, such as for example the language preference indicated by the visitor. Other cookies collect statistics about the visitors of our website or make sure that the graphical layout of the website is correctly represented and that the applications of the website operate correctly.

Some cookies are necessary to make the website operate, other cookies are intended to improve your user experience. More information on the use of cookies on our website, and more in general, by Lansweeper, can be found [here](#).

12. Links to other websites

The Lansweeper website may contain links to websites that are administered by customer companies outside Lansweeper. Those other websites have their own privacy policy which you should carefully read when you visit them. In no case whatsoever shall we be held liable for the content of those websites, nor for any processing of personal data by these third parties.

13. Anonymous data

Lansweeper is permitted to collect non-personal and anonymous data and anonymize personal data. This data does not allow Lansweeper to proceed to identify an individual person and this data can be shared with third parties, including for statistical purposes.

14. Modification of the privacy policy

This privacy policy is subject to modifications.

Lansweeper may change this privacy policy to reflect changes in the law, our personal data handling practices, or the features of our business or services. We will make the updated privacy policy available on our website and show the date the privacy policy was last updated and version, to help you know when we change it. If we make material changes to our privacy policy, we will endeavour to provide you with notice in advance through our website(s) (for example by means of pop-up screens) as well as by means of our other commonly used communication channels (for example by email, if we have your email address).

15. Contact us

If you have questions or want to submit a request you can always contact us by sending an email to security@lansweeper.com or by sending a letter to or send a letter to Fraterstraat 212, 9820 Merelbeke, Belgium.

Please send requests for additional general information concerning the protection of personal privacy to the Belgian Data Protection Authority to the address, 25 Drukpersstraat, B-1000 Brussels telephone number: +32 (0)2 274 48 00 or via email at contact@apd-gba.be (www.dataprotectionauthority.be).