

Privacy Policy – Streamliner Platform

1. Introduction and scope

This Privacy Policy (the “**Policy**”) applies to the products, software and platform(s), expressly including the Streamliner SaaS Platform (the “**Platform(s)**”) owned, operated and/or used by:

<i>STREAMSIDE NV</i> <i>Verdussenstraat 29</i> <i>2018 Antwerpen</i> <i>Belgium</i> <i>Enterprise Number: BE 0744.940.105</i>

hereinafter “**Streamside**”, “**we**” or “**us**”

Streamside deems the protection of privacy of the utmost importance and wishes to enable you – as user of its Platform(s) – to maintain full control over what happens to your Personal Data and your privacy and to inform you accordingly.

All capitalized terms that are not defined in this Policy shall have the meanings as ascribed to them in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (“**General Data Protection Regulation**” or “**GDPR**”).

Your Personal Data and your privacy are protected by Streamside in accordance with Belgian and European regulations on the protection of privacy. Please read this Policy very carefully. The following describes not only your rights, but also the way in which you can exercise these rights.

By using our Platform, disclosing your Personal Data, or accepting this Policy, you acknowledge the manner in which Streamside collects and Processes your Personal Data as described in this Policy.

2. Who Processes your Personal Data and how can you contact us?

Streamside is responsible for the Processing of your Personal Data that you provide through the Platform(s) and shall act as a Data Controller in respect of your Personal Data processed through the Platform.

Streamside has appointed a Data Protection Officer, whom you can always contact for questions about your privacy and the Processing of your Personal Data. The Data Protection Officer can be reached at:

Streamside NV <i>Verdussenstraat 29</i> <i>2018 Antwerpen</i> <i>Belgium</i>	Data Protection Officer <i>Name: Roel De Meester</i> <i>Email: dpo@streamliner.cloud</i> <i>Telephone: +32 498 41 66 99</i>
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3. What Personal Data are collected and Processed?

Streamside Processes different types of Personal Data, depending on the services you use on the Platform(s) and as relevant. The following Personal Data might be Processed by Streamside when using the Platform:

<i>Contact information</i>	Personal Data such as name, (office) email address, role on the Platform(s), location linked in the Digital Supply Chain Network, and which is necessary to create and register an account.
<i>Personal Information</i>	Personal Data such as job title, mobile phone number, (office) phone number, Skype address, LinkedIn page, avatar, and which is provided voluntarily to supplement an account.
<i>History and logs</i>	Personal Data such as number of visits on the Platform(s), average time spent on the Platform(s), other types of personal and transactional data relating to your usage of the Platform(s).
<i>Technical information</i>	Personal Data such as your IP address, browser type.
<i>Cookies</i>	For more information, reference is made to our Cookie Policy .

Where Personal Data of a third party are disclosed via the Platform(s) or with a view to use the Platform(s), the person communicating the Personal Data guarantees that he or she has informed that third party and that he has received all necessary consents to communicate the third party's Personal Data.

4. What are the purposes and principles of Processing Personal Data?

The purpose and principles of the Processing of your Personal Data mainly depends on the category of Personal Data concerned. Below you will find an overview of the purpose and principles of the various Personal Data that we Process.

Contact information	<i>Purpose</i>	Contact information is collected to create a personal account, to allow you to have access (through your account) to the Platform(s), to communicate, to provide communication features (e.g. for B2B communication in connection with order follow-up and delivery), to comply with our obligations in respect of the Platform towards our clients (i.e. the organization for which you are using the Platform) (such as the audit and reporting services relating to the delivery process inherent to the Platform) and to enable such clients to use the Platform, to provide support services such as debugging, to provide other services by Streamside, etc.
	<i>Grounds for Processing</i>	Performance of the agreement and legitimate interest.
Personal information	<i>Purpose</i>	Personal information is collected to further supplement your personal account on the Platform to enhance your user experience on the Platform(s) and to comply with our obligations in respect of the Platform towards our clients (i.e. the organization for which you are using the Platform) (such as the audit and reporting services relating to the delivery process inherent to the Platform) and to enable such clients to use the Platform.
	<i>Grounds for Processing</i>	Consent

History and logs	<i>Purpose</i>	History and logs data are collected for the proper functioning of the Platform(s), to comply with our obligations in respect of the Platform towards our clients (i.e. the organization for which you are using the Platform) (such as the audit and reporting services relating to the delivery process inherent to the Platform) and to enable such clients to use the Platform, to enable Streamside to improve the functioning of the Platform(s), for diagnostic purposes, etc.
	<i>Grounds for Processing</i>	Legitimate interest
Technical information	<i>Purpose</i>	Technical information is collected for the proper functioning of the Platform(s), to comply with our obligations in respect of the Platform towards our clients (i.e. the organization for which you are using the Platform) (such as the audit and reporting services relating to the delivery process inherent to the Platform) and to enable such clients to use the Platform, to enable Streamside to improve the functioning of the Platform(s), for diagnostic purposes, etc.
	<i>Grounds for Processing</i>	Legitimate interest
Cookies		For more information, reference is made to our Cookie Policy .

Below we describe each applicable Ground for Processing in detail:

Legitimate interest as a legal basis for the lawfulness of Processing is justified with regard to the Personal Data to improve your user experience, the Platform(s) and Streamside's product and services. The fact that Streamside Processes this Personal Data also benefits you as a user of the Platform(s). Moreover, such Processing of Personal Data shall not create a risk to the fundamental rights and freedoms of you as a user of the Platform(s) or any other users of the Platform(s).

The Processing of certain of the above-mentioned Personal Data by Streamside and other information you might disclose, is necessary for the **performance of the agreement**. In the event you refuse to provide these Personal Data, Streamside will not be able to comply with certain of its obligations (e.g. responding to your questions).

We ask your consent to Process your Personal Data. The **consent** you provide is always free, and you have the right to withdraw this consent at any time. Withdrawal of consent does not affect the Processing of Personal Data (i) prior to such withdrawal, (ii) based on a legitimate ground for Processing Personal Data, and (iii) in case of a legitimate interest of the Processing.

The above reasons may not be exhaustive, and Streamside may at any time Process your Personal Data for any other legitimate reason. In such cases, Streamside will notify you as soon as possible of the reason. Updates of this Policy may constitute such a notification.

5. Receiving and sharing Personal Data

Streamside receives your Personal Data in cases as and when:

- You create or register an account in the Platform(s);
- You use the Platform(s) through your account;
- You interact with other users on the Platform(s).

Streamside will always share your Personal Data in a minimal way. However, to be able to follow through on your request or action on our Platform(s), Streamside may sometimes need to share Personal Data with third parties. Your Personal Data may also be shared within the Streamside group. You therefore provide your express consent to share your Personal Data as described in this Policy.

Processors and Subprocessors of Streamside always act under the responsibility of Streamside. If Streamside contracts Processors or Subprocessors, this will always be done in accordance with a Data Processor Agreement that meets the requirements of the GDPR and that protects your Personal Data as well as possible.

Streamside may share your Personal Data with third parties, for hosting and processing, responding to your queries, sending content to you, host the Platform(s), and for optimizing our Platform(s). Upon request, Streamside shall, as soon as possible after the request, inform you of the third parties with whom your Personal Data have been shared.

If you are directed to another application, platform or website through the Platform(s), other terms and conditions and other privacy and cookie policies may apply. You should take into account any such terms and conditions and privacy and cookie policies of such applications, platforms and websites. We encourage you to read these terms and conditions and privacy and cookie policies of the other applications, platforms and websites you visit.

6. Direct Marketing

Streamside will not use your Personal Data for direct marketing purposes without your consent.

On regular basis, the users of the Platform will be informed or surveyed on new features, FAQ, tips & tricks and other Streamside related information in the form of a post, questionnaire, webinar or newsletter.

7. Transfer of Personal Data outside the European Economic Area (EEA)

Streamside does not transfer your Personal Data to countries outside the EEA. If and to the extent Streamside will in the future transfer Personal Data to countries outside the EEA, Streamside shall only transfer your Personal Data outside the EEA in accordance with applicable law (such as chapter V of the GDPR) (e.g. model contract clauses, binding corporate rules, codes of conduct, adequacy decisions, etc.).

8. How will my Personal Data be retained?

Streamside applies the following retention periods for your Personal Data:

Contact information	<p>Personal Data such as email address will be deleted upon deletion of your account on our Platform, unless in case these Personal Data must be retained for a longer retention period, i.e. then they will be retained for as long as justified for the performance of the agreement or for the legitimate interest of Streamside or the organization pursuant to which you are using the Platform (as applicable) in respect of the Platform (such as the provision and receiving of audit and reporting services which are inherent to the services provided via the Platform).</p> <p>Personal Data such as name, role on the platform and location will be retained for three (3) years after deletion of your account on our Platform, unless in case these Personal Data must be retained for a longer period, i.e. then they will be retained for as</p>
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	long as justified for the performance of the agreement or for the legitimate interest of Streamside or the organization pursuant to which you are using the Platform (as applicable) in respect of the Platform (such as the provision and receiving of audit and reporting services which are inherent to the services provided via the Platform).
Personal information	Personal Data will be deleted upon deletion of your account on our Platform, unless in case these Personal Data must be retained for a longer retention period, i.e. then they will be retained for as long as justified for the performance of the agreement or for the legitimate interest of Streamside or the organization pursuant to which you are using the Platform (as applicable) in respect of the Platform (such as the provision and receiving of audit and reporting services which are inherent to the services provided via the Platform).
History and logs	Personal Data will be retained for three (3) years after deletion of your account on our Platform, unless in case these Personal Data must be retained for a longer period, i.e. then they will be retained for as long as justified for the performance of the agreement or for the legitimate interest of Streamside or the organization pursuant to which you are using the Platform (as applicable) in respect of the Platform (such as the provision and receiving of audit and reporting services which are inherent to the services provided via the Platform).
Technical information	Personal Data will be retained for three (3) years after deletion of your account on our Platform, unless in case these Personal Data must be retained for a longer period, i.e. then they will be retained for as long as justified for the performance of the agreement or for the legitimate interest of Streamside or the organization pursuant to which you are using the Platform (as applicable) in respect of the Platform (such as the provision and receiving of audit and reporting services which are inherent to the services provided via the Platform).
Cookies	For more information, reference is made to our Cookie Policy .

9. How are my Personal Data safeguarded?

Streamside has developed appropriate technical and organizational measures, safeguards and assurances to Process your Personal Data in accordance with applicable Belgian and European regulations, in particular to protect your Personal Data against loss, misuse, or unauthorized alteration.

Streamside makes all reasonable and appropriate efforts to protect the confidentiality of your Personal Data.

Despite the above measures taken by Streamside, you should be aware that there are always risks associated with sending Personal Data over the Internet. The security and protection of your Personal Data can never be fully guaranteed.

10. What rights do I have?

If and in as far as provided for in the applicable Belgian and European legislation, you have the right:

- a) to receive confirmation as to whether Streamside Processes your Personal Data and, where this is the case, to access the Personal Data that Streamside Processes;
- b) to make corrections without undue delay, of any inaccurate or incomplete Personal Data;
- c) to delete your Personal Data;
- d) to obtain your Personal Data and to transfer them to another Controller or Processor;
- e) to limit the Processing of your Personal Data, to the extent possible, subject to applicable Belgian and European regulations;
- f) to receive your Personal Data in a structured, common and machine-readable format;
- g) to prevent the Processing of your Personal Data and the use of your Personal Data for direct marketing purposes;
- h) where the Processing of your Personal Data is based on points (e) and (f) of article 6(1) of the GDPR, to object to the Processing of Personal Data.

You may exercise these rights by contacting the Data Protection Officer per e-mail (dpo@streamliner.cloud) and providing him or her with a copy of the front-side of your identity card. You shall at all times be able to change your Personal Data in your account through the features made available in the Platform.

If and to the extent provided for in the applicable Belgian and European legislation, you have the right to file a complaint with the competent supervisory authority should the Processing of your Personal Data violate the applicable regulations. In Belgium, this is the Data Protection Authority (“Gegevensbeschermingsautoriteit”) <https://www.dataprotectionauthority.be>.

Contact details Belgian Data Protection Authority (“Gegevensbeschermingsautoriteit”):

Drukpersstraat 35, 1000 Brussel, Belgium
+32 (0)2 274 48 00
+32 (0)2 274 48 35
contact@apd-gba.be

11. Amendments to this Policy

Streamside may amend this Policy at any time. The date of the most recent version is shown in the top right-hand corner of the Policy. Amendments are posted on the Platform(s) to keep you informed at all times of the information that Streamside collects and of how it uses and shares this information.

Amended versions of this Policy take effect ten (10) days after their publication on the Platform(s). Where required they will always be submitted for approval.

12. Consent for disclosure

You acknowledge that we may disclose your Personal Data if this is required by law, or if Streamside determines in good faith that such disclosure is required in order:

- a) to comply with any pending judicial inquiry, judicial order or litigation pertaining to the Platform(s);
- b) to respond to claims against Streamside regarding Personal Data that violate any rights of third parties;

- c) to safeguard the rights, property and safety of Streamside, its employees, users, and the general public.

Streamside may disclose your Personal Data to competent police or judicial authorities or other official government authorities if Streamside deems this useful or necessary, in its sole discretion, for the investigation of fraud, intellectual property infringement or any other harmful activity, or if Streamside reasonably suspects that such activity may expose Streamside or you to any liability.

13. Liability

If Streamside has legitimately transmitted your Personal Data to a third party (not being a Processor or Subprocessor), Streamside shall not be liable for any unlawful Processing or unlawful use by that third party.

Under no circumstances does Streamside accept responsibility for any direct or indirect damage resulting from faulty or unlawful use of the Personal Data by a third party (not being a Processor or Subprocessor).

Streamside is also not liable when third parties Process or use your Personal Data illegitimately and Streamside has taken the appropriate technical and organizational measures to go against such illegitimate Processing or use.

Streamside is in any case only liable for the damage caused by Processing of Personal Data if it did not comply with its specific obligations of GDPR. Streamside shall in no event be liable for any special, incidental, indirect or consequential losses or damages.

14. Applicable law and competence clause

This Policy shall be governed, interpreted, and implemented in accordance with Belgian law, which applies exclusively in the event of any dispute.

The Courts of Antwerp and the Antwerp division within the jurisdiction of Antwerp are exclusively competent to decide on any dispute that may arise from the interpretation or implementation of this Policy, without prejudice to the consumer's right to present a dispute before the competent court on the basis of a mandatory statutory provision.

Last updated: October 07, 2022