

Privacy Statement

The Geneto application available at <https://app.geneto.technology> (hereinafter referred to as the "Application") is offered by:

Geneto BV (hereinafter referred to as "Geneto", "We", and "Us")

Wolfpoortstraat 4

B-1652 Alsemberg

Belgium

VAT-BE0722.906.950

Phone: 0499 56 74 52

Email: info@geneto.be

1 DEFINITIONS

For the purposes of this Privacy Statement, the following terms shall be understood as outlined below:

- **Licensee(s):** Any natural or legal person who, in the context of their professional activity, uses Geneto's services and has obtained a license for the Application.
- **User:** Any natural person using the Application on behalf of the Licensee and disclosing personal data to Geneto, including but not limited to: employees of the Licensee, as well as directors, appointees, volunteers, etc. (hereinafter also referred to as "you" and "your").
- **Customer(s):** Any natural person whose personal data is placed on the Application by the Licensee or a User, with the explicit exclusion of Users.
- **Data Subject(s):** Any natural person whose personal data is placed on the Application and thus processed by Geneto, including: Users and Customers.

2 WHY A PRIVACY STATEMENT?

This Privacy Statement informs each User, in accordance with applicable privacy laws, about the processing activities Geneto may carry out with their personal data.

As a User, you provide certain personal data. This personal data constitutes information that allows us to identify you as a natural person, regardless of whether we actually do so. You are identifiable as soon as it is possible to create a direct or indirect link between one or more pieces of personal data and you as a natural person.

We use and process personal data of all Users (and more broadly: of all Data Subjects) in accordance with the GDPR and other relevant legal provisions. Any reference in this Privacy Statement to the "GDPR" is a reference to the Regulation of April 27, 2016, concerning the protection of natural persons in relation to the processing of personal data and the free movement of such data (General Data Protection Regulation).

Geneto reserves the right to modify this Privacy Statement at any time. Any substantial change will be clearly communicated to the Users. We recommend that the User regularly consult this document.

3 WHO PROCESSES PERSONAL DATA THROUGH THE APPLICATION?

3.1 Geneto as Data Controller

With respect to Users, Geneto is the "data controller" within the meaning of the GDPR. Geneto alone or jointly with others determines which personal data of Users is collected, as well as the purposes and means of processing these personal data.

Except as outlined in Article 3.2 ("Geneto as Processor"), this Privacy Statement solely concerns the processing activities that Geneto undertakes in the capacity of data controller.

Geneto has taken appropriate technical and organizational measures to protect the personal data of all Users. Geneto uses a variety of adequate security technologies and procedures to help protect personal data from unauthorized access, use, or disclosure. Geneto places the personal data provided by the Users in a controlled, secure environment where personal data is protected against unauthorized access, use, or disclosure.

Geneto uses carefully selected "data processors" for the processing of personal data of Users. This is done to ensure good service provision. A "processor" is a natural or legal person who processes personal data on behalf of or at the request of the data controller. The processor is obliged to ensure the security and confidentiality of the personal data. The processor always acts according to the instructions of the data controller.

Geneto uses the following categories of "processors":

Companies we have engaged for analytical purposes (e.g., Google Analytics);
Companies we have engaged for administrative purposes (e.g., Google Calendar);
Companies we have engaged for communication purposes (e.g., Amazon SES);

To optimally protect the personal data of the Users, Geneto has made the necessary contractual arrangements with the aforementioned data processors to ensure they apply the same high standards as Geneto. Regarding the transfer of personal data to processors outside the European Economic Area, refer to Article 7 ("Who receives your data?").

3.2 Geneto als Processor

The User acknowledges that they also bear a certain responsibility in the field of data processing. When the User enters personal data of Customers into the Application, they act on behalf of and according to the instructions of the Licensee. The latter has the capacity of data controller since the Licensee alone decides which personal data of Customers is collected without the intervention or control of Geneto.

The User understands that in this context, Geneto only acts as a processor responsible for the proper technical operation of the Application. In this regard, Geneto has already pointed out to the Licensee in mutual contractual relationships that they must adequately inform their Customers about the purposes for which their personal data is collected. The Licensee must also inform the Users about their responsibilities when processing personal data of Customers.

Of course, Geneto has also taken appropriate technical and organizational measures to protect the personal data of the Customers.

4 ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL DATA OF USERS?

In accordance with the GDPR, we process personal data of Users on the following legal grounds:

- ☐ Based on the performance of the agreement as agreed with the Licensee, or the taking of pre-contractual steps at their request; or
- ☐ Based on compliance with legal or regulatory provisions concerning the management of the contractual relationship, particularly invoicing;
- ☐ Based on our legitimate interest in sending information and newsletters to the Licensee;
- ☐ Based on your explicit consent for sending promotional offers (direct marketing).

5 WHAT PERSONAL DATA IS PROCESSED?

Geneto commits to collecting and processing only those personal data that are relevant and necessary for the purposes for which they are processed.

The following categories of personal data are processed:

- ☐ Personal identification data (name, first name, address, login details);
- ☐ Contact details (phone number and email address);
- ☐ Personal data (gender, age).
- ☐ This personal data is collected when you register on the Application. The amount of personal data collected depends on your use of the features of the Application.

Additionally, we collect and process personal data to ensure the proper technical functioning of the Application for the User. We use various means to optimize the user experience and detect any (technical) errors in the Application:

- ☐ Cookies: We use cookies to recognize the User and provide a personalized user experience, remember their technical choices (e.g., staying logged in), and detect and correct any errors on the Application. See our Cookie Policy for more information on how we use cookies;
- ☐ Log information: This includes information such as the IP address and various telecommunication data;
- ☐ Information regarding the device used such as hardware, software, and network information;
- ☐ Local storage information.
- ☐ Moreover, we collect location data through our Application. Based on this data, your (probable) location can be determined and indicated on a map ('Map'). These indications (based on an IP address) are, however, far from accurate, and therefore insufficient to determine your precise location. We do not use this location data to identify you, but only to ensure the proper technical functioning of our Application.

The Application also collects anonymous data, which is technical data used solely for internal purposes to get an idea of user navigation on the Application. The collected information may be sent to third parties for external analysis, but only insofar as we have carried out prior anonymization.

We do not collect any sensitive personal data, such as data about your race, political opinions, health, religious and other beliefs, sexual orientation, etc.

The User always provides the personal data to Geneto and can thus exercise a certain control. If certain personal data are incomplete or seemingly incorrect, Geneto reserves the right to temporarily or permanently postpone certain expected actions.

6 FOR WHAT PURPOSES ARE YOUR PERSONAL DATA USED?

Geneto collects personal data from Users to provide each User of our Application with a secure, optimal, and personalized user experience. The collection of personal data is further expanded as the User makes more intensive use of our Application. Geneto reserves the right to suspend or cancel certain operations if personal data is missing, incorrect, or incomplete.

Data processing is essential for the functioning of our Application and the related services. The processing is carried out exclusively for the following specific purposes:

- ☐ Management of the Application: answering direct questions; providing individual support; invoicing additional services/products; offering general information, product information, and newsletters; obtaining and processing user reviews;
- ☐ Detection and reporting of fraud, errors, and/or criminal behavior;
- ☐ Management of disputes;
- ☐ Personalized offers if you have expressly consented to them. In this case, you are always free to withdraw your consent.

7 WHO RECEIVES YOUR PERSONAL DATA?

Your personal data is processed exclusively for internal use within Geneto. Your personal data will not be sold, passed on, or communicated to third parties, unless you have given us your explicit consent or the transfer is necessary for the execution of the agreement or is legally required.

A transfer of personal data to a processor outside the European Economic Area (EEA) can only take place to countries that the Belgian Data Protection Authority has determined provide an adequate level of protection or, if this is not the case, insofar as Geneto has made the necessary contractual arrangements with this processor, taking into account the standard provisions imposed by the Belgian Data Protection Authority.

8 HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Your personal data is retained for as long as necessary to achieve the purposes set out in Article 6. They are removed from our database when they are no longer needed to achieve these purposes or if the User validly exercises the right to delete the personal data..

9 WHAT ARE YOUR RIGHTS?

9.1 Guarantee of lawful and secure processing of personal data

Your personal data is always processed for legitimate purposes, as outlined in Article 6. It is collected and processed in an appropriate, relevant, and proportionate manner, without excessive processing, and is retained only for as long as necessary to achieve the purposes set out.

9.2 Right to access

If you can prove your identity, you have the right to obtain information about the processing of your personal data. Thus, you have the right to access the purposes of the processing, the categories of personal data, the categories of recipients to whom the personal data is sent, the criteria to determine the period of data retention, and the rights you can exercise regarding your personal data..

9.3 Right to rectification of personal data

Inaccurate or incomplete information can be corrected. It is up to the User in the first place to make the necessary adjustments in the user account, but you can also request this in writing..

9.4 Right to deletion of your personal data

You have the right to have your personal data deleted in the following cases:

- ☐ Your personal data is no longer necessary for the purposes set out;
- ☐ You withdraw your consent and there is no other legal basis for the processing;
- ☐ You have validly exercised your right of opposition;
- ☐ Your personal data is unlawfully processed;
- ☐ Your personal data must be deleted to comply with a legal obligation.

The deletion of personal data is primarily related to visibility; it is possible that the deleted personal data remains temporarily stored.

9.5 Right to restriction of processing

In some cases, you have the right to request restrictions on the processing of your personal data. This is certainly true in case of a dispute about the accuracy of personal

data, if the data is necessary for legal proceedings, or during the time needed for Geneto to determine that you can validly exercise your right of deletion..

9.6 Right to object

You have the right to object at any time to the processing of your personal data for direct marketing purposes. Geneto will cease processing your personal data unless it can demonstrate compelling legitimate grounds for the processing that override your right to object.

9.7 Right to data portability

You have the right to receive the personal data you have provided to Geneto in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller unless it is technically impossible..

9.8 Right to withdraw consent

Insofar as the processing is based on prior consent, you have the right to withdraw this consent. This personal data will only be processed if we have another legal basis for this.

10 HOW CAN YOU EXERCISE YOUR RIGHTS?

If you wish to exercise your rights, you should send a written request and proof of identity by registered mail to Geneto BV, Wolfpoortstraat 4, 1652 Alseberg, Belgium, or by email to info@geneto.be. We will respond as soon as possible, and no later than one (1) month after receiving the request.

11 POSSIBILITY TO FILE A COMPLAINT

If you have any complaints about the processing of your personal data by Geneto, you can always contact us through the contact information in Article 2 of this Privacy Statement. Additionally, you have the right to file a complaint with the competent data protection authority.

12. MORE INFORMATION?

For more information about this Privacy Statement or about how Geneto processes your personal data, you can always contact us through the contact information in Article 2 of this Privacy Statement.

For more information about privacy protection in general, you can contact the Belgian Data Protection Authority at the following address:

Drukpersstraat 35 B-1000 Brussels

Phone: +32 (0)2 274 48 00

Email: contact@apd-gba.be