

## PRIVACY STATEMENT - FULLY EUROPE

The website:

- <https://fully.eu>

(hereafter: the “Website”) and all its subdomains are offered by:

**FULLY EUROPE BVBA**

Nieuwewandeling 62/10,

B- 9000 Gent

Company number (VAT BE): 0635.808.769.

(hereafter: “Fully”)

E-mail : [standup@fully.com](mailto:standup@fully.com)

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Feel free to contact us should you have any privacy-related questions. We promise to reply soon!

### 1 Why this Privacy Statement?

Every person who visits or uses the Website (hereafter the “User”) will almost inevitably disclose a certain amount of personal data. The personal data is information which allows FULLY to identify you as a natural person, regardless of whether we actually do this. You are identifiable as soon as it is possible to create a direct or indirect link between one or more data and you as a natural person.

We only use and process your personal data in accordance with the GDPR and any replacement legislation, or any similar regulation under any applicable law, and any regulatory requirements or codes of practice governing the use, storage or transmission of personal data. Every reference in this Privacy Statement to the ‘GDPR’ is a reference to the Regulation 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 (General Data Protection Regulation).

Through this Privacy Statement, every User is informed of the processing activities FULLY may carry out with his or her personal data. FULLY reserves the right to modify this Privacy Statement at all times. If we make any material changes to this Privacy Statement, we will notify you by posting the new version of the Privacy Policy on the Website or may send each

User a courtesy email. It is your responsibility to check the Website for updates to this Privacy Statement.

## **2 Who is responsible for the processing of your personal data?**

### **2.1. Data Controller**

FULLY is responsible for the processing of your personal data and decides alone or in cooperation with others which personal data is being collected as well as the purposes and the technical and organisational means with regard to the processing of your personal data. FULLY has taken appropriate technical and organizational measures to protect the personal data of its Users. FULLY uses a variety of adequate security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. FULLY secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

### **2.2. Data Processor(s)**

FULLY is free to rely on data processors for the processing of your personal data. A processor is the natural or legal person who processes your personal data upon request and on behalf of the data controller. Each data processor is required to ensure the security and confidentiality of the data. The data processor shall always act on the instructions of the data controller.

FULLY relies on the following categories of data processors:

- Companies we have engaged for marketing purposes;
- Companies we have engaged for communication purposes (e.g. live chat on the website)
- Companies we have engaged for hosting purposes;
- Companies we have engaged for administrative purposes (e.g. account management and invoicing);
- Companies we have engaged for statistical purposes;
- Companies we have engaged for logistic purposes (e.g. storage, order picking, labelling and shipping);
- Companies we have engaged for payment purposes.

With a view to the optimal protection of the personal data of the Users, FULLY has made the necessary contractual arrangements with the aforementioned data processors to ensure that they apply the same privacy standards as FULLY.

As a resident of the European Economic Area, a transfer of your personal data outside the European Economic Area (EEA) can only take place to countries that ensure an adequate level of protection. In the absence of an adequacy decision, Jaswig/Fully EU will only transfer personal data to third countries when appropriate safeguards are provided. In particular, Jaswig/Fully EU uses processors located in the United States and has made the necessary contractual arrangements, taking into account the standard data protection clauses adopted by the Commission, to ensure that your personal information receives an adequate level of protection.

**Use of Intercom Services:** We use third-party analytics services to help understand your usage of our services. In particular, we provide a limited amount of your information (such as sign-up date and some personal information like your email address) to Intercom, Inc. ("Intercom") and utilize Intercom to collect data for analytics purposes when you visit our website or use our product. As a data processor acting on our behalf, Intercom analyzes your use of our website and/or product and tracks our relationship by way of cookies and similar technologies so that we can improve our service to you. For more information on Intercom's use of cookies, please visit <https://www.intercom.com/terms-and-policies#cookie-policy>. We may also use Intercom as a medium for communications, either through email, or through messages within our product(s). As part of our service agreements, Intercom collects publicly available contact and social information related to you, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses, to enhance your user experience. For more information on the privacy practices of Intercom, please visit <https://www.intercom.com/terms-and-policies#privacy>. Intercom's services are governed by Intercom's terms of use which can be found at <https://www.intercom.com/terms-and-policies#terms>. If you would like to opt out of having this information collected by or submitted to Intercom, please contact us.

### **3 On what legal grounds is your personal data processed?**

In accordance with the GDPR we process your personal data on the following legal grounds:

- On the basis of the execution of the contract agreed upon with you or the execution of pre-contractual steps taken at your request; or
- On the basis of compliance with legal or regulatory provisions with regard to the management of the contractual relationship, invoicing in particular;
- On the basis of our legitimate interest in sending information and newsletters to our customers;
- On the basis of your consent to send promotional offers (direct marketing).

## 4 Which personal data is being processed?

The personal data of Users is collected when they fill out a contact form on our Website or when they complete our online ordering method.

FULLY commits to only collect and process your personal data in a way that is adequate, relevant and limited to what is necessary for the purposes for which they are processed. The following categories of personal data are processed by FULLY:

- Personal identification data (name, first name, address, IP address);
- Contact details (telephone number and e-mail address);
- Financial identification data (bank details);
- Any other personal data you send us by e-mail, via the contact form or via our online chat (e.g. a CV).

We also use cookies in order to recognise the returning visitor of our Website and to offer every User a personalised user experience, to remember technical choices (e.g. a shopping cart), and to detect and correct any errors which might be present on the Website.

For more information concerning the use of cookies, we kindly refer you to our Cookie Policy that you can find under heading 11 Cookies.

## 5 For which purposes is your personal data being used?

FULLY collects your personal data for the sole purpose of offering every User of our a safe, optimised and personal user experience of our Website and the offered services. The collection of personal data becomes more extensive as the User makes more intensive use of our Website and our online services. FULLY reserves the right to suspend or cancel certain operations if personal data is missing, incorrect or incomplete.

The processing of your personal data is essential for the proper functioning of the Website and the provision of associated services. FULLY commits to solely process your personal data for the following purposes:

- Allowing Users to make purchases via our Website, showing the customers the right info/content on the website based on their IP address;
- Customer management: customer administration, account management, invoicing, customer support, complaint monitoring and sending newsletters;
- Answering and following up on questions which are asked via the chat functionality on our Website, in a way that is clear, relevant and to the point;

- Dispute management;
- To detect and offer protection against all fraud, errors and criminal behaviours on the Website.
- Personalized marketing and advertising if you have expressly agreed to it. In that case, you are free to withdraw your consent at any time.

When visiting the website of FULLY, some data is being collected for statistical purposes. Such data is necessary to optimise your user experience. These data are: IP-address, probable location of consultation, hour and day of the consultation and the pages which are being consulted. When you visit the Website, you explicitly agree to this collection of data for statistical purposes. We offer two currencies on our website and to serve to correct pricing to the right people we use the IP address of the session to link a country to the session. We then store that info in a cookie so we can serve the right pricing in EUR or GBP to the right people. We do not save that data anywhere and not use it for other reason than stated above.

We do not, under any circumstances, collect sensitive personal information, such as information about your race, political opinions, health, religious or other beliefs, sexual orientation, etc.

The User provides the personal data to FULLY himself and therefore retains a certain degree of control. When certain personal data is incomplete or apparently incorrect, FULLY has the right to postpone some expected actions temporarily or permanently.

## **6 Who receives your personal data?**

Your personal data is processed for internal use within FULLY only. Your personal data will not be sold, passed on or communicated to any third parties, except in case you have given us your explicit prior consent or in case the transmission is necessary for the performance of the contract or is legally required.

As a resident of the European Economic Area, a transfer of your personal data outside the European Economic Area (EEA) can only take place to countries that ensure an adequate level of protection. In the absence of an adequacy decision, FULLY will only transfer personal data to third countries when appropriate safeguards are provided. In particular, FULLY uses processors located in the United States and has made the necessary contractual arrangements, taking into account the standard data protection clauses adopted by the Commission, to ensure that your personal information receives an adequate level of protection.

## **7 How long do we store your personal data?**

Your personal data is stored as long as necessary to achieve the purposes pursued. Your personal data will be erased from our database as soon as it is no longer necessary for the purposes pursued or if you validly exercise your right to erasure.

## **8 What are your rights?**

### **8.1 Guarantee of a legitimate and secure process of your personal data**

Your personal data is always processed for the legitimate purposes explained in point 5. Your personal data is collected and processed in an appropriate, relevant and non-excessive manner, and is not kept longer than necessary to achieve the intended purposes.

### **8.2 Right to access**

If you can prove your identity, you have the right to obtain information about the processing of your data. Thus, you have the right to know the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data is transmitted, the criteria used to determine the data retention period, and the rights that you can exercise with regard to your personal data.

### **8.3 Right to rectification of your personal data**

Inaccurate or incomplete personal data may be corrected. It is primarily the responsibility of the User to notify us of any updates or changes regarding his personal information, but you can also request us in writing.

### **8.4 Right to erasure (or “right to be forgotten”)**

You also have the right to obtain the erasure of your personal data under the following assumptions:

- Your personal data are no longer necessary for the intended purposes;
- You withdraw your consent to the processing and there is no other legal ground for processing;
- You have validly exercised your right of opposition;
- Your personal data has been illegally processed;
- Your personal data must be deleted to comply with a legal obligation.

The deletion of data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.

## 8.5 Right to limitation of processing

In certain cases, you have the right to request the limitation of the processing of your personal data, especially in case of dispute as to the accuracy of the data, if the data are necessary in the context of legal proceedings or the time required to FULLY to verify that you can validly exercise your right to erasure.

## 8.6 Right to object

You have the right to object at any time to the processing of your personal data for direct marketing purposes. FULLY will stop processing your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over your right to object.

## 8.7 Right to data portability

You have the right to obtain any personal data which you have provided us in a structured, commonly used and machine readable format. At your request, this data may be transferred to another provider unless it is technically impossible.

## 8.8 Right to withdraw your consent

You may withdraw your consent to the processing of your personal data at any time, for example for direct marketing purposes.

## 9 How to exercise my rights?

If you wish to exercise your rights, you must send a written request and proof of identity by registered mail to FULLY BVBA, Nieuwewandeling 62/10, B- 9000 Gent, Belgium or by email to [standup@fully.com](mailto:standup@fully.com). We will respond as soon as possible, and no later than one (1) month after receipt of the request.

## 10 Possibility to lodge a complaint

If you are not satisfied with the processing of your personal data by FULLY, you have the right to lodge a complaint with the competent Data Protection Authority (for Belgium: <https://www.dataprotectionauthority.be/>).

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13/02/2019