

## **EFFECT BV - Privacy Statement**

### **1. Who are we?**

**EFFECT BV**, a limited liability company under Belgian law, having its offices at Denen 167, 9080 Lochristi (Belgium), registered with the Crossroads bank for Enterprises under number VAT BE 0847.214.628, RLE Ghent, section Ghent and with bank account number [BE26 2900 4099 3029] (hereinafter "**EFFECT**", "**we**" or "**us**").

The current privacy statement (hereinafter the "**Privacy Statement**") describes certain of our personal data processing activities as a Controller according to the applicable Belgian and European data protection legislation (including 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 (hereinafter the "**GDPR**"), as well as the Belgian Act of 30 July 2018 regarding the protection of natural persons in relation to the processing of personal data).

If you have any further questions about this Privacy Statement and/or the processing of your personal data, please contact us by sending an e-mail to [privacy@effect.be](mailto:privacy@effect.be).

### **2. What should I know before reading this Privacy Statement?**

The current Privacy Statement aims to inform you about how EFFECT collects and processes your personal data, about your rights and the way in which you can exercise them. Please read this Privacy Statement carefully.

You are typically:

- a visitor of (one of) our websites (accessible via [effect.be](http://effect.be), [flow.cobox.cc](http://flow.cobox.cc), [cobox.cc](http://cobox.cc) or any other domain name redirecting the surfer towards these websites) ("**Website**");
- a supplier or service provider of EFFECT;
- a client to which EFFECT provides services;
- an applicant who applied to one of our vacancies;
- a prospective client, supplier or service provider with whom EFFECT is engaging in discussions regarding the provision of certain services; or
- anyone who reaches out to EFFECT by the contact form on the Website, e-mail, phone, through social media (such as Instagram, Facebook or LinkedIn) and/or in any other way.

EFFECT reserves the right to modify the current Privacy Statement at any time. Any changes we may make to our Privacy Statement will be indicated on the Website and when proportionate and in line with the significance of the changes, may be notified to you by e-mail or brought under your attention on your next Website visit (e.g. through the use of a "pop-up"). Please review our Privacy Statement periodically to stay informed of changes that may affect you.

Amended versions of this Privacy Statement take effect ten (10) calendar days after their publication on the Website and/or other form of announcement and, if legally required, will be submitted for approval. In case the modifications are necessary to comply with a legal requirement, such changes will take effect immediately.

### **3. For which purpose do we process your personal data, on which legal basis and for how long?**

EFFECT processes personal data for the purposes and on the legal basis specified in this section (if and to the extent applicable to your situation). This list may evolve and will be updated as necessary.

EFFECT processes different types of personal data; this depends on the functionalities you use on our Websites and on the personal data you share with us.

We may process the following categories of personal data:

- identification and contact details, which include personal data that allows us to identify and contact you (such as name and first name, phone number, e-mail address, company name/address, function title, company number and VAT number);
- technical information, which includes:
  - o technical information about your computer, mobile and other devices used to visit our Website (such as, your IP-address, what type of device it is, application ID, operating system, crash data, browser type and configuration) – whether we collect some or all of this information often depends on what type of device you are using and its settings;
  - o information regarding your usage of our Website automatically recorded by our servers (such as, website history, logs, date, time, language preferences, frequency, duration of the pages you have viewed), and;
  - o information regarding consent(s) given by you (such as, the date and time of your consent, the user agent, IP-address, unique device identifiers or user-ID);
- financial details, which include personal data required to process payments such as bank account number;
- professional details, such as personal data about your profession, the company you work for, job title, (company) address, company number and VAT number; and
- any other (category of) personal data you share with us.

We kindly request you to refrain from sharing special categories of personal data (such as, but not limited to, health related data, data regarding your sexual orientation, trade union membership, religious beliefs, etc.). In case you do provide us with such personal data we understand you have the intent of manifestly making this personal data public (in accordance with Article 9.2 (e) GDPR) and we can process such personal data to carry-out the purpose of processing for which you share this personal data and as listed below.

If you provide us personal data belonging to a third party, you guarantee that you were entitled to share such personal data and such sharing is legitimate in accordance with the applicable Belgian and European data protection legislation.

### 3.1 Responding to requests

|                       |   |
|-----------------------|---|
| Purpose               | - To respond to requests (e.g. submitted via the contact form on the Website, e-mail or social media, etc.)   |
| Type of personal data | - Identification and contact details<br>- Technical information<br>- Any accompanying message and/or information you share with us via the relevant contact form on our Website or another medium |
| Legal basis           | - Consent   |
| Retention term        | - As long as necessary to answer to your request<br>- Your personal data will in any event be deleted no later than 1 year after our last contact.  |
| Data subject          | - Anyone who contacts EFFECT through the aforementioned methods   |

### 3.2 Operation of our Website

|         |   |
|---------|---|
| Purpose | - To use our Website<br>- To ensure the proper functioning of our Website<br>- To allow us to recognize the end-user that is using our Website<br>- To remember your preferences (such as language preferences) so that we can automatically read and respect your preferences on all subsequent and future end-user sessions |
|---------|---|

|                       |  |
|-----------------------|--|
|                       | <ul style="list-style-type: none"> <li>- To allow us to keep evidence of particular consents you have provided to us</li> <li>- To protect the security of our systems and of your personal data to our best efforts, e.g. by creating a back-up</li> </ul>              |
| Type of personal data | <ul style="list-style-type: none"> <li>- Technical information, for which we use cookies and similar technologies to collect</li> </ul>  |
| Legal basis           | <ul style="list-style-type: none"> <li>- Consent (for non-essential cookies)</li> <li>- Legitimate interest (for essential cookies)</li> </ul> <p>Rejecting and/or disabling certain cookies may cause our Website to malfunction or to hinder your user experience.</p> |
| Retention term        | <ul style="list-style-type: none"> <li>- The retention period varies from as long as the duration of a session/Website visit, to as long as necessary for EFFECT's legitimate interests or to as long as your consent is not withdrawn (as applicable)</li> </ul>        |
| Data subject          | <ul style="list-style-type: none"> <li>- Website visitors</li> </ul>   |

For more information on this processing activity, we refer to our [Cookie Statement](#).

### 3.3 Analytical purposes

|                       |   |
|-----------------------|---|
| Purpose               | <ul style="list-style-type: none"> <li>- To improve our Website</li> <li>- To tailor our Website to your use</li> <li>- To monitor effectiveness and accessibility of our Website</li> <li>- For other technical, statistical and diagnostical purposes</li> </ul> <p>Personal data collected from you for these purposes will only be used by us (to the greatest reasonable extent possible) in an aggregated and de-identified format.</p> |
| Type of personal data | <ul style="list-style-type: none"> <li>- Technical information, for which we use cookies and similar technologies to collect</li> </ul>   |
| Legal basis           | <ul style="list-style-type: none"> <li>- Consent</li> </ul>   |
| Retention term        | <ul style="list-style-type: none"> <li>- The retention period is the earlier of the duration of a session/Website visit, or the withdrawal of your consent</li> </ul>   |
| Data subject          | <ul style="list-style-type: none"> <li>- Website visitors</li> </ul>  |

For more information on this processing activity, we refer to our [Cookie Statement](#).

### 3.4 Business administration

|                       |  |
|-----------------------|--|
| Purpose               | <ul style="list-style-type: none"> <li>- To manage our client contracts</li> <li>- To manage our supplier and service provider contracts</li> <li>- Communicate and negotiate with prospect clients, suppliers and service providers</li> <li>- To perform our business administration (e.g. invoicing, tax administration)</li> <li>- To manage questions/complaints about our services</li> <li>- To inform clients, supplier and service providers about changes brought to our prices and contractual documents</li> <li>- To analyse and improve our services based on feedback received</li> </ul> |
| Type of personal data | <ul style="list-style-type: none"> <li>- Identification and contact details</li> <li>- Financial details</li> <li>- Any additional information you share with us (e.g. in relation to any complaint)</li> </ul>  |
| Legal basis           | <ul style="list-style-type: none"> <li>- Legitimate interest</li> <li>- Performance of a contract (or taking steps prior to contract conclusion)</li> </ul>  |

|                |  |
|----------------|--|
| Retention term | <ul style="list-style-type: none"> <li>- Up to ten (10) years after the expiry or termination of our contractual relationship</li> <li>- As long as necessary for EFFECT's legitimate interest(s)</li> </ul> |
| Data subject   | <ul style="list-style-type: none"> <li>- (Contact persons/personnel of) clients, suppliers, service providers and prospects</li> </ul>   |

### 3.5 Direct Marketing

|                       |   |
|-----------------------|---|
| Purposes              | <ul style="list-style-type: none"> <li>- To send promotional e-mails and newsletters to our existing clients and prospects, suppliers and service providers about our services, including about new services, as well as invitations for events and other information which we think might interest them</li> </ul> |
| Type of personal data | <ul style="list-style-type: none"> <li>- Identification and contact details</li> <li>- Technical information</li> </ul>   |
| Legal basis           | <ul style="list-style-type: none"> <li>- Consent</li> <li>- Legitimate interest (RD 4 April 2003)</li> </ul>  |
| Retention period      | <ul style="list-style-type: none"> <li>- Personal data obtained for direct marketing purposes will be deleted after one (1) year or as soon as you withdraw your consent (whichever occurs first)</li> </ul>  |
| Data subject          | <ul style="list-style-type: none"> <li>- Existing clients and/or prospects, suppliers and services providers who have explicitly agreed to receive direct marketing</li> </ul>  |

***You shall have the right at any time to object to the processing of your personal data for direct marketing purposes, including profiling, to the extent that it is related to such direct marketing, free of charge, by sending an e-mail to [privacy@effect.be](mailto:privacy@effect.be)***

### 3.6 Recruitment of new personnel and creating a talent pool for future vacancies

|                       |   |
|-----------------------|---|
| Purpose               | <ul style="list-style-type: none"> <li>- To hire new personnel through the contact form or the designated e-mail address <a href="mailto:privacy@effect.be">privacy@effect.be</a></li> </ul>  |
| Type of personal data | <ul style="list-style-type: none"> <li>- Identification and contact details</li> <li>- Professional details</li> <li>- Any additional information you share with us in relation to your job application</li> </ul>                    |
| Legal basis           | <ul style="list-style-type: none"> <li>- To take steps at your request prior to entering into a contract</li> <li>- Legitimate interest</li> </ul>  |
| Retention term        | <ul style="list-style-type: none"> <li>- Up to five (5) years after notifying the last candidate that he/she is not retained for the job, unless a longer retention term applies in accordance with this privacy statement</li> </ul> |
| Data subject          | <ul style="list-style-type: none"> <li>- Job applicants (Website visitors)</li> </ul>   |

|                       |  |
|-----------------------|--|
| Purpose               | <ul style="list-style-type: none"> <li>- To create a talent pool for future vacancies and recruitment purposes</li> </ul>  |
| Type of personal data | <ul style="list-style-type: none"> <li>- Identification and contact details</li> <li>- Professional details</li> <li>- Any additional information you share with us in relation to your job application</li> </ul> |
| Legal basis           | <ul style="list-style-type: none"> <li>- Consent</li> </ul>  |
| Retention term        | <ul style="list-style-type: none"> <li>- Up to five (5) years after obtaining your consent.</li> <li>- Your personal data will in any event be deleted in the event you withdraw your consent.</li> </ul>          |
| Data subject          | <ul style="list-style-type: none"> <li>- Job applicants</li> </ul>   |

### 3.7 Adherence to our legal obligations and exercise of legal rights

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|-----------------------|---|
| Purpose               | <ul style="list-style-type: none"><li>- To comply with our legal obligations (e.g. accountancy and tax legislation)</li><li>- To cooperate with any ongoing judicial investigation, court order or lawsuit, or any other request from an appropriate judicial authority, police or its representatives</li><li>- To file a report to the police on our own account if we have founded suspicions that the use you make of our services constitutes a legal breach</li><li>- To protect our and/or the rights of third parties, including by legal proceedings</li><li>- To respond to requests from data subjects</li></ul> |
| Type of personal data | <ul style="list-style-type: none"><li>- Identification and contact details</li><li>- Any accompanying message and/or information you share with us e.g. related to a data subject request and/or judicial investigation or lawsuit</li><li>- Other types of personal data, depending on the circumstances and/or legal obligation concerned</li></ul>   |
| Legal basis           | <ul style="list-style-type: none"><li>- Legal obligation</li><li>- Legitimate interest of defending or enforcing our or third party's rights</li></ul>  |
| Retention term        | <ul style="list-style-type: none"><li>- Up to ten (10) years after the expiry or termination of our relationship</li><li>- As long as otherwise required by law and/or the circumstances (e.g. for the duration of the investigation or legal procedure)</li></ul>  |
| Data subject          | <ul style="list-style-type: none"><li>- Clients, Website visitors, suppliers, service providers, prospects, and any individuals whose personal data is processed in this context</li></ul>  |

### 3.8 Corporate restructuring

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|-----------------------|--|
| Purpose               | <ul style="list-style-type: none"><li>- To organize EFFECT's corporate restructuring as the case may be, including any merger or acquisition, fusion, (financial) restructuring, sale or shares/assets, etc.</li></ul> <p>Where possible, EFFECT shall aggregate and/or de-identify such personal data prior to sharing.</p> |
| Type of personal data | <ul style="list-style-type: none"><li>- Identification and contact details</li><li>- Any accompanying message and/or information you have shared with us</li><li>- Other types of personal data, depending on the context</li></ul>  |
| Legal basis           | <ul style="list-style-type: none"><li>- Legitimate interest</li></ul>  |
| Retention term        | <ul style="list-style-type: none"><li>- As long as required to carry out the purpose</li></ul>   |
| Data subject          | <ul style="list-style-type: none"><li>- Clients, suppliers, service providers, Website visitors, prospects</li></ul>   |

**For certain processing purposes, EFFECT requires your consent. The consent you give is always free and you have the right to withdraw it at any time.** You can withdraw your consent by sending an email to [privacy@effect.be](mailto:privacy@effect.be). Your withdrawal of consent does not affect the processing of personal data prior to such withdrawal or our processing activities which are based on any other legal basis.

#### 4. With whom do we share your personal data?

EFFECT may share your personal data, as required for carrying-out the purposes described in the previous section, with:

- third party service providers (such as IT service providers, security providers, payment procurement providers, independent contractors, marketing service providers, or hosting providers);
- professional advisers (such as accountants, experts, lawyers or auditors);
- counterparty(ies) and judge, tribunal or court in the context of legal proceedings;
- supervisory authorities and other law enforcement agents; and
- third parties to whom we intend or choose to sell, transfer or merge (parts of) our shares, business or assets.

Upon request, EFFECT shall, as soon as possible after the request, inform you of the third parties with whom your personal data have been shared by providing you a more detailed list.

Processors of EFFECT always act under the responsibility of EFFECT. If EFFECT engages processors, this will always be done in accordance with a data processing agreement that meets the requirements of the GDPR. We require all our processors or to take appropriate technical and organizational (including security) measures to protect your personal data in line with our policies. We do not allow our processors to use your personal data for their own purposes.

## **5. Do we transfer your personal data to third countries?**

In principle, your personal data will be processed within the European Economic Area ("EEA").

However, EFFECT might transfer your personal data to recipients in third countries outside the EEA. It is also possible that EFFECT -through its processors- does transfer your personal data to countries outside the EEA. EFFECT will only transfer your personal data to recipients outside the EEA in accordance with the applicable data protection legislation and subject to appropriate safeguards (e.g. an adequacy decision of the European Commission or contractual guarantees, such as EC standard contractual clauses).

Please contact us if you want further information on the specific mechanism(s) used by us when transferring personal data to recipients established outside of the EEA.

## **6. How long will we retain your personal data?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes determined in section 3 of this Privacy Statement, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, or, if applicable, until the moment you withdraw your consent.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you or the organization you work for. Afterwards it is still possible that they can be found in our back-ups or archives, but they will no longer be actively processed in a file and such back-ups or archives will be deleted automatically in accordance with our back-up and archiving policies.

For information on the retention period of personal data processed through cookies, we refer to our [Cookie Statement](#).

## **7. What security measures does EFFECT undertake?**

EFFECT is committed to trying to make sure that your personal data is secure and makes all reasonable and appropriate efforts to protect the confidentiality of your personal data. We have implemented appropriate technical and organizational measures, safeguards and assurances to process your personal data in accordance with the GDPR, in particular to protect your personal data against loss, misuse, or unauthorized alteration or destruction, taking into account the sensitivity of the information we collect, process and store, the industry's best practices and the current state of technology.

Despite the above measures taken by us, 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, nor can we guarantee that unauthorized third parties will never be able to defeat those measures or use your personal data for improper purposes.

## 8. What are my rights under GDPR?

Within the limits defined in Articles 15-22 of the GDPR, you have the following rights in relation to your personal data:

- **Access right.** You have the right to be informed of whether we process your personal data, and if that is the case, to have access to such personal data.
- **Right of rectification.** You have the right to have your inaccurate and/or incomplete personal data, corrected.
- **Right to erase data.** You have the right to have your personal data erased, under certain circumstances, namely when one of the following applies:
  - o if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - o if you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
  - o if you object to the processing in case the processing is for direct marketing purposes;
  - o if the personal data have been unlawfully processed; or
  - o if the personal data have to be erased for compliance with a legal obligation in EU or national law.

In case you submit a request in this regard, we shall consider:

- o our interests and those of third parties, which may count more than yours, and
  - o all legal and regulatory obligations, or court or administrative decisions which may be in contradiction with the erasure of your personal data.
- **Right to restriction of processing.** You have the right to restrict the processing of your personal data, if one of the following applies:
  - o if you contest the accuracy of the personal data, for a period enabling EFFECT to verify the accuracy of the personal data;
  - o if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
  - o if EFFECT no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
  - o if you objected to the processing pending the verification whether EFFECT's legitimate interests override yours.
- **Right to object.** You have the right to object to the processing of your personal data. EFFECT shall no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- **Right to data portability.** You have the right to obtain the personal data you have provided to us in a structured, commonly used and machine-readable form, and to transfer (have transferred) that personal data to another controller.
- **Right to withdraw consent.** If the processing of your personal data is based upon your consent, you always have the possibility to withdraw your consent, as mentioned in section 3 of the current Privacy Statement

If you wish to exercise one of the aforementioned rights, you may submit a request to us by sending an e-mail to [privacy@effect.be](mailto:privacy@effect.be) shall acknowledge receipt of your request and provide you with more information on action taken on such request without undue delay and in any event within one (1)

month of receipt of the request. This period may be extended by two further months where necessary, taking into account the complexity and number of the requests, and informing you of the reasons for the delay.

Please note that in some cases we may require you to give more information about yourself to ensure that we are dealing with the correct person.

In principle, we will handle your request free of charge. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested (we will always inform you of the applicable fee before charging it); or
- refuse to act on your request.

### **9. How do I contact EFFECT and how do I file a complaint?**

If and to the extent provided for in the applicable data protection legislation, you have the right to lodge a complaint before the competent supervisory authority should the processing of your personal data violate the applicable regulations. In Belgium the competent authority is the Data Protection Authority:

*Gegevensbeschermingsautoriteit / Autorité de Protection des Données  
Drukpersstraat 35, 1000 Brussel*

*Tel: +32 (0)2 274 48 00 or email: [contact@apd-gba.be](mailto:contact@apd-gba.be)*

We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in first instance at [privacy@effect.be](mailto:privacy@effect.be).

### **10. Is EFFECT responsible for third party links on the Website?**

The Website may contain links to third party platforms, websites and/or applications. EFFECT is not responsible for the content of these platforms, websites and applications and is not responsible for the privacy standards and practices of such third parties. We recommend you to read the relevant privacy statements of these third parties and their platforms, websites and/or applications before you accept their cookies and visit them to ensure yourself that your personal data is sufficiently protected.

### **11. To what extent can I hold EFFECT liable under this Privacy Statement?**

To the maximum extent permitted by applicable law, EFFECT shall not accept any liability in the following events:

- if EFFECT has lawfully shared your personal data with a third party (not being its (sub-)processor), it shall not be liable for any subsequent unlawful processing or misuse of that personal data by such third party and any direct or indirect damages resulting therefrom; or
- if third parties unlawfully process or use your personal data and EFFECT has implemented appropriate technical and organizational measures to prevent, to the best of its abilities, such unlawful processing or use (e.g. in the event of hacking or any other cyberattack).

In any case, EFFECT shall only be liable for damages caused by non-compliance of its specific obligations under the GDPR. EFFECT shall in no event be liable for any special, incidental, indirect or consequential losses or damages in this regard.

### **12. What is the applicable law and competence under this Privacy Statement?**

This Privacy Statement shall be governed, interpreted, and implemented in accordance with Belgian laws. The Ghent courts (section Ghent) are exclusively competent to decide on any dispute that may arise from the interpretation or implementation of this Privacy Statement, without prejudice to the



consumer's right to present a dispute before a competent court on the basis of a mandatory statutory provision.

**Last updated:** June 2025