

# PRIVACY POLICY SEINŌ B.V.

We are SEINŌ B.V.. We respect your privacy, but sometimes we need your Personal Data. We consider **Personal Data** to be any information relating to an identified or identifiable person, in conformity with the General Data Protection Regulation (the **GDPR**).

This policy explains which Personal Data we use and why (the **Privacy Policy**). Furthermore, you will read how we store, protect and process this Personal Data.

This Privacy Policy applies to our Website [www.seino.ai](http://www.seino.ai) (the **Website**), our online application (the **App**) and the services or products we provide (the **Services**). We process your Personal Data in accordance with the GDPR and all other relevant legislation and regulations in the field of protection of Personal Data, like Dutch Telecommunications Act (Telecommunicatiewet) regarding the use of cookies (the **Relevant Legislation**).

## **Are you under the age of 16?**

If you are younger than 16 years old, you need permission from your parents or legal guardian to use our Website, App and Services.

## **Processing of Personal Data**

In order to provide you with our Website, App and Services, we process your Personal Data.

## **Who is the controller of your Personal Data?**

We are the controller of your Personal Data within the meaning of the Relevant Legislation. At the end of this Policy, you can find our contact details and the contact details of our Data Protection Officer.

## **What Personal Data do we process, on which legal basis and for which specified purpose(s)**

We need some of your Personal Data in order for you to use our Website, Apps and Services.

We are allowed to process your Personal Data, because we comply with the Relevant Legislation. We lawfully process your Personal Data because:

- Processing Personal Data is necessary in order to perform our contract;
- We have to comply with a legal obligation;
- We have legitimate interests to process your Personal Data, where we have considered these are not overridden by your rights;
- You have given us consent;
- Processing is necessary in order to protect the vital interests of you or another person, or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

We make sure that the processing of your Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose for which the Data is processed.

In the table below you will read (1) which Personal Data we process (2) for which purpose(s) and (3) on which legal basis.

We shall only use your Personal Data for the following purposes or for compatible purposes. By doing so, we will not use your Personal Data in an unexpected manner.

<b>(Personal) Data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>
<p><i>Contact Data:</i></p> <ul style="list-style-type: none"> <li>-Company name;</li> <li>-First and/or last name;</li> <li>-Email address;</li> <li>-Address;</li> <li>-Phone number;</li> <li>-IP-address;</li> <li>-Chamber of Commerce number;</li> <li>-VAT number;</li> </ul>	<p><i>We use these Data:</i></p> <ul style="list-style-type: none"> <li>-To contact you;</li> <li>-To correspond with you;</li> <li>-For the delivery or performance of our Services to you;</li> </ul>	<p><i>We process these Data on the basis of:</i></p> <ul style="list-style-type: none"> <li>-A necessity to perform the contract</li> <li>-Consent</li> <li>-A legal obligation</li> </ul>
<p><i>Payment Data:</i></p> <ul style="list-style-type: none"> <li>-Payment Data of the paying party;</li> </ul>	<p><i>We use these Data:</i></p> <ul style="list-style-type: none"> <li>-To send invoices;</li> <li>-To update our financial administration;</li> </ul>	<ul style="list-style-type: none"> <li>-A necessity to perform the contract-Consent-A legal obligation</li> </ul>

### **How do we receive your Personal Data?**

#### Personal data we receive from you:

We receive Personal Data directly from you when you sign up via our website.

### **Are you obliged to share your Personal Data with us?**

In some cases, the processing of your Personal Data is necessary. This is relevant, for example, when we have to process your Personal Data in order to oblige to a contract with you or to provide a service to you. Without your Personal Data, we cannot provide our Service to you.

### **Automated individual decision-making**

We do not use automated individual decision-making.

### **How do we secure your Personal Data?**

We do our utmost to protect your Personal Data from being lost, destroyed, abused, altered or spread by unauthorized parties. For this reason, persons who have nothing to do with your Personal Data, do not have access to them. We ensure this by taking the following measures:

- Encryption (encoding) of digital files containing Personal Data;
- Secure network connections with Secure Socket Layer (SSL), or a comparable technology;
- The access to the Personal Data is strictly limited to the employees on a 'need to know' basis;
- The access to the Personal Data is secured by two-step authentication.

### **How long do we store your Personal Data?**

We shall not store your Personal Data longer than the period in which we need them for the aforementioned purposes. We delete the Personal Data after we no longer need them for the purpose we process them for.

## **With whom do we share your Personal Data?**

### *Processors*

We may share your Personal Data with data 'processors' within the meaning of the Relevant Legislation. We conclude a Data processing agreement with these parties, which entails that they shall process your Data carefully and that they shall only receive the Personal Data they need to provide their service. These parties shall only use your Personal Data in accordance with our instructions and not for their own purposes. We only share your Personal Data with the following categories of processors: cloud hosting providers, authentication providers, payment service providers, and providers of financial services. They perform the following tasks for us: cloud computing, secure authentication, and the proper execution of payments and financial administration.

If we have a legal obligation to share your Personal Data, we will do so. This is the case, for example, if a public authority legally requires us to share your Personal Data.

## **Transfer**

We shall only process your Personal Data within the European Union. We shall only process your data outside the European Union if that country offers an appropriate level of protection for your Personal Data.

We shall never transfer your Personal Data to other countries or to other parties than those mentioned above.

## **Links**

Our website and our App may contain links to other websites. We are not responsible for the content or the privacy protection on these websites. Therefore, we advise you to always read the Privacy Policy of those websites.

## **Cookies**

A cookie is a small text file that can be sent via the server of a website to the browser. The browser saves this file to your computer. Your computer is tagged with a unique number, which enables our site to recognize that computer in the future.

We use cookies to improve the user experience on our Website. Moreover, cookies ensure that the Website works faster, that you can visit our Website safely and that we can track and solve errors on our Website.

You can always delete or disable cookies yourself via the browser settings. No more cookies will be stored when you visit our Website. However, please note that without cookies, our Website may not function as well as it should.

### **Modifications to the Privacy Policy**

We may modify this Privacy Policy. If we substantially modify the Privacy Policy, we shall place a notification on our Website and in our App together with the new Privacy Policy. We shall notify registered users in case of a substantial modification. If you are not a registered user, we advise you to consult the Website and this Policy regularly.

### **Your rights**

You have the following rights:

- You can request access to your Personal Data;
- You can request us to correct, limit or delete your Personal Data. In the event of fraud, non-payment or other wrongful acts, we can store some of your Personal Data in a register or on a blacklist;
- You can request a copy of your Personal Data. We can provide this copy to third parties at your request, so you do not have to do so yourself;
- You can object to the processing of your Personal Data;
- You can file a complaint at the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) if you are of the opinion that we wrongfully process your data;
- You can always withdraw your permission to process your Personal Data. From the moment of your withdrawal, we cannot process your Personal Data anymore.

**Contact**

In the event that you wish to exercise these rights, or in the event of other questions or remarks regarding our Privacy Policy, you can contact us via the following contact details.

SEINō B.V.

Albert Einsteinweg 4

8218NH Lelystad

0854010093

hello@seino.ai

**Data protection officer**

Frank van den Brink

0854010093

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