

1. Introduction

- 1.1. We, WebsiteProjects sprl (registration number BE0475082343) are committed to safeguarding the privacy of our Website visitors and service users.
- 1.2. This Policy applies where we are acting as a data controller with respect to the personal data of our Website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3. We use cookies on our Website (the Website includes all webpages on the following domains: websiteprojects.eu, websiteprojects.be, websiteprojects.nl, websiteprojects.es, websiteprojects.it, websiteprojects.support). Insofar as those cookies are not strictly necessary for the provision of our Website and services, by continuing using the website, user will give his/her consent anyway as pre regulations of ePrivacy Directive. Please see Section 8 for more information about Cookies.
- 1.4. In this Policy, "we", "us" and "our" refer to WebsiteProjects sprl. For more information about us, see Section 12. of this Policy.

2. How we use your personal data

- 2.1. In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2. We may process data about your use of our Website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in monitoring and improving our Website and services for your convenience. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.3. We may process your account data ("account data"). The account data may include your name and email address, accounting and invoicing information and similar. The source of the account data is you. The account data may be processed for the purposes of operating our Website, providing our services, ensuring the security of our Website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in maintaining proper administration of our Website and services provision, or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.4. We may process your information included in your personal profile on our Website ("profile data"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, employment details and similar. The profile data may be processed for the purposes of enabling and monitoring your use of our Website and services. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in maintaining proper administration of our Website and business or the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.5. We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include hosting, domain, security certificates data, post-sale support requests and similar. The source of the service data is you. The service data

may be processed for the purposes of operating our Website, providing our services, ensuring the security of our Website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in maintaining the proper administration of our Website and services provision or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.

- 2.6. We may process information that you post for publication on our Website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our Website and services. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in the proper administration of our Website and business, or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.7. We may process information contained in any enquiry you submit to us regarding our services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is either your direct, free, and opted-in consent.
- 2.8. We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include contact information, quotes, support requests, accounting information, etc. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in maintaining proper management of our customer relationships. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.9. We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our Website ("transaction data"). The transaction data may include type and quality of services, characteristics of software used or developed, amounts paid or similar. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in maintaining proper administration of our Website and services provision. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.10. We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is either your direct, free, and opted-in consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.11. We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our Website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is either your direct, free, and opted-in consent or our legitimate interest, namely our interest in maintaining proper administration of our Website and business as well as communications with Website users. Type of legal basis depends on the actual relationship between you and us in a particular moment of time.
- 2.12. We may process any of your personal data identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 2.13. We may process any of your personal data identified in this Policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining

professional advice. The legal basis for this processing is our legitimate interests, namely our interest in maintaining proper protection of our business in regards to various risks.

- 2.14. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.15. Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.2. We may disclose some of your personal data to our suppliers or subcontractors if any, insofar as reasonably necessary for providing you our services according to the best practices on the market and fulfilling our contractual and/or legal obligations under any applicable law.
- 3.3. Financial transactions relating to our Website and services may be handled by our payment services providers, such as Stripe Inc. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://stripe.com/be/privacy> .
- 3.4. We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our Website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 3.5. In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

- 4.1. In this Section 4, we provide information about the circumstances in which your personal data shall not be transferred to countries outside the European Economic Area (EEA).
- 4.2. We have not offices and/or facilities in third countries. Transfers (if any) to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained or by the use of our binding corporate rules.

5. Retaining and deleting personal data

- 5.1. This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3. We will retain your personal data as follows:
 - (a) Usage data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of eight (8) years following the same date.

- (b) Account data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of eight (8) years following the same date.
- (c) Profile data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of eight (8) years following the same date.
- (d) Service data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of five (5) years following the same date.
- (e) Publication data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of ten (10) years following the same date.
- (f) Enquiry data will be retained for a minimum period of one (1) year following your last use of our services and/or Website, and for a maximum period of three (3) years following the same date.
- (g) Customer relationship data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of five (5) years following the same date.
- (h) Transaction data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of five (5) years following the same date.
- (i) Notification data will be retained for a minimum period of three (2) years following your last use of our services and/or Website, and for a maximum period of four (4) years following the same date.
- (j) Correspondence data will be retained for a minimum period of three (3) years following your last use of our services and/or Website, and for a maximum period of ten (10) years following the same date.

5.4. In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of Usage data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (b) the period of retention of Account data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (c) the period of retention of Profile data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (d) the period of retention of Service data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten

(10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).

- (e) the period of retention of Publication data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (f) the period of retention of Enquiry data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (g) the period of retention of Customer relationship data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (h) the period of retention of Transaction data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (i) the period of retention of Notification data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).
- (j) the period of retention of Correspondence data will be retained for a minimum period of three (3) years following the last use of the Website by you, and for a maximum period of ten (10) years following the last use of the Website by you. The main criteria for evaluating the most reasonable length of retention period are: legitimate basis of processing data (e.g. your agreement with us, your consent etc.); proportionality of your rights as data subject and our legitimate interest to continue processing of your personal data (e.g. for our services improvement), other legal basis (e.g. necessity to fulfill our obligations under the applicable law).

5.5. Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1. We may update this Policy from time to time by publishing a new version on our Website.
- 6.2. You should check this page occasionally to ensure you are happy with any changes to this Policy.
- 6.3. We will notify you of any changes to this Policy by email or through the private messaging system on our Website, or any other reasonable means of communication.

7. Your rights

- 7.1. In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2. Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 7.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by visiting <https://websiteprojects.support> when logged into our Website.
- 7.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent to consent-based processing; (iii) you object to the processing under certain rules of applicable data protection law; (iv) the processing is for direct marketing purposes; (v) and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation; (iii) or for the establishment, exercise or defence of legal claims.
- 7.6. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public

interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- 7.8. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10. To the extent that the legal basis for our processing of your personal data is:
 - (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13. You may exercise any of your rights in relation to your personal data by written notice to us or by email at info@websiteprojects.eu, in addition to the other methods specified in this Section 7.

8. About cookies

- 8.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1. We use cookies for the following purposes:
 - (a) Authentication – we use cookies to identify you when you visit our Website and as you navigate our Website. Cookies used for this purpose are: PHPSESSID;
 - (b) Status – we use cookies to help us to determine if you are logged into our Website. Cookies used for this purpose are: PHPSESSID;

10. Cookies used by our service providers

- 10.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our Website.
- 10.2. We use Google Analytics to analyse the use of our Website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our Website is used to create reports about the use of our Website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: _ga (expiration time 2 years, used to distinguish users), _gid (expiration time 24 hours, used to distinguish users), _gat (expiration time 1 minute, used to throttle request rate), AMP_TOKEN (30 seconds to 1 year, used to retrieve a Client ID from AMP Client ID service). Google's Analytics Cookie Usage on Websites is available at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

11. Managing cookies

- 11.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- A. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 - B. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - C. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 - D. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - E. <https://support.apple.com/kb/PH21411> (Safari); and
 - F. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- 11.2. Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3. If you block cookies, you will not be able to use all the features on our Website.

12. Our details

- 12.1. This website is owned and operated by WebsiteProjects srl.
- 12.2. We are registered in Brussels, Belgium under registration number BE0475082343, and our registered office is at Rue Fritz Toussaint 25, 1050 Brussels.
- 12.3. You can contact us by email, using info@websiteprojects.eu

13. Data protection officer

Our data protection officer's contact details are: Pietro Spigai, email: info@websiteprojects.eu.