#### STRUKT BV

# **Privacy policy**

This Privacy Policy applies to all interactions with Strukt BV, which acts as the data controller for the personal data it processes. Our registered office is at Johan Westerlundplein 30/204, 2000 Antwerpen, Belgium and registered under enterprise number 1023.243.003. By engaging with us through our website, email, newsletter, or any business relationship, you confirm that you have read this policy.

This Privacy Policy outlines how we collect, use, and protect your personal data in accordance the General Data Protection Regulation (GDPR – EU Regulation 2016/679) and other applicable European data protection legislation. This policy also complies with Belgian privacy law, including the Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

#### ARTICLE 1 WHAT WE COLLECT

We collect personal data that you voluntarily provide or that is necessary to conduct our business depending on your relation. This may include your name, email address, phone number, company name, function, billing details, communication content, and any other information you choose to share with us through our website, email, meetings, or contracts. We also process technical information such as your IP address and browser details through access logs for the purpose of ensuring the stability and security of our services.

Our services are not directed to individuals under the age of 16, and we do not knowingly collect or process data relating to children. If we become aware that such data has been collected inadvertently, we will take steps to delete it.

# ARTICLE 2 WHY WE USE YOUR DATA

We process personal data to communicate with you, provide our services, maintain business relationships, respond to inquiries, manage contracts, and fulfill legal and administrative obligations. In certain cases, we may use your data to send you information or updates, but only if you have explicitly subscribed (e.g. via our newsletter form).

Our processing is based on one or more of the following legal bases under the GDPR:

- the necessity of processing to perform a contract or take steps at your request;
- our legal obligations (such as financial and tax compliance);
- our legitimate interest in communicating and operating effectively as a business;

• your consent, where required (e.g. for marketing communications).

For newsletter subscriptions, we rely on your consent under Article 6(1)(a) of the GDPR. Subscriptions use a double opt-in mechanism, and every newsletter contains an unsubscribe link. Existing clients may receive similar updates under applicable soft opt-in exemptions, in accordance with the e-Privacy Directive.

## ARTICLE 3 SHARING WITH THIRD PARTIES

We do not sell your personal data.

We may share personal data with trusted third parties that help us operate our business and fulfill obligations, such as external service providers, subcontractors, financial and legal partners, or public authorities when required by law.

If our business is ever reorganized, sold, or otherwise transferred, your data may be part of that transfer. In such cases, we will ensure the continuity of privacy protections as outlined here.

## ARTICLE 4 INTERNATIONAL TRANSFERS

Some of our processing partners may be located outside the European Economic Area (EEA). In such cases, we ensure appropriate safeguards are in place, including the use of the Standard Contractual Clauses (processors) for the transfer of personal data to third countries which do not ensure an adequate level of data protection, as approved by the European Commission.

## ARTICLE 5 RETENTION

We retain accounting and tax-related data for up to seven (7) years in accordance with Belgian legal obligations. For client, supplier, or prospect data, we retain personal information during the use of our services and for up to one (1) year after service termination or last contact. Data may then be deleted or anonymized unless further retention is legally required.

## ARTICLE 6 YOUR RIGHTS

Under the GDPR, you have the right to access, correct, delete, or restrict the processing of your personal data. You may also object to processing based on legitimate interest, request the transfer of your data, or withdraw consent at any time where processing is based on consent.

To exercise your rights, contact us at privacy@strukt.be or by post at:

Strukt BV Johan Westerlundplein 30/204 2000 Antwerpen, Belgium

You also have the right to file a complaint with the Belgian Data Protection Authority (GBA/APD) or any other supervisory authority within the European Union in accordance with Article 77 of the GDPR.

## ARTICLE 7 SECURITY

We take appropriate technical and organizational measures to protect your data against unauthorized access, loss, or misuse. These measures include access controls, encryption where relevant, and internal policies to ensure that data is handled with care and confidentiality.

While we take reasonable precautions, no data transmission or storage system can be guaranteed 100% secure. We are not responsible for actions taken by third parties who gain unauthorized access, unless such access results from a breach of our obligations.

## ARTICLE 8 COOKIES

Our website does not currently use cookies or similar tracking technologies beyond strictly necessary technical functionality. Should this change in the future, we will update this policy and seek your consent where required.

#### ARTICLE 9 CHANGES

This policy may be updated periodically to reflect legal or operational changes. If we make material changes to the purposes or legal basis of processing, we will proactively inform affected individuals and seek new consent if legally required. The latest version is always available at strukt.be/privacy. Continued interaction with us after any updates implies your acceptance of the revised terms.

If you have any questions about this Privacy Policy or how we handle your data, don't hesitate to reach out to us at privacy@strukt.be.