

PRIVACY POLICY FOR SENSOLUS' PARTNERS

Last version: August 2023

Hi there! As you are a partner of Sensolus NV, we may have to collect and store personal data relating to you or your employees (hereinafter "your personal data"), e.g. to keep you updated on any changes we make to our Solution (as defined below).

As we deeply care about your privacy and value transparency in our business relations, we have prepared this short, but very important document to inform you (i) on how we collect, treat and store your personal data; (ii) the rights you can exercise in relation to your personal data; and (iii) the measures we take to protect it and to secure our Solution ("Privacy Policy").

Please note that we may update this Privacy Policy from time to time to make sure the content stays up to date. The latest version (including the revision dates) can always be found on our website: https://www.sensolus.com/ ("Website"). When significant changes are made to this Privacy Policy, we will send you a quick notification.

We always attempt to act in accordance with the applicable privacy legislation, such as the European General Data Protection Regulation 2016/679 ("GDPR"), the Belgian Privacy Act of 30 July 2018 and the European ePrivacy Directive 2002/58/EC (including all future legislative changes and amendments made to the foregoing).



Quick recap: who are we?

We are Sensolus, a public limited company ('naamloze vennootschap') incorporated and existing under the laws of Belgium, with its registered office at 9000 Ghent, Moutstraat 54, Belgium with VAT/company number BE-0543.551.277 ("SENSOLUS" or "we" | "us").

We are the developer of an end-to-end solution consisting of (a combination of) hardware, a platform and/or other related services (together: the "**Solution**").

In light of the GDPR, SENSOLUS will act as the **CONTROLLER** of your personal data for the purposes described in this Privacy Policy. This means, we are in control of (and thus, responsible for) your personal data. But no worries, you retain certain rights over your personal data which you can exercise vis-à-vis SENSOLUS (please see below).



Which personal data are we talking about?

We will traditionally collect and store the following information relating to you:

- ✓ Company name
- ✓ Country of incorporation
- ✓ Full name contact person(s)
- Language (and/or preferred language of communication)
- ✓ Job title contact person(s);
- ✓ Other voluntarily provided information
- ✓ (Professional) email;



How do we collect your personal data?

We will use and store personal data that you have provided to us when you:

- ✓ used or viewed our Website (i.e. after agreeing to cookies in your browser);
- ✓ submitted a contact or demo request via the contact form on our Website;
- √ sign(ed) a partner agreement with SENSOLUS (incl. any communication exchanged in the context thereof).



It enables us to keep you informed on the Solution

We always strive to keep our Solution top notch by regularly implementing new updates or integrating new features. We like to keep you, our trusted partner, informed thereof (! we also consider awareness on all features of our Solution an essential condition to be a SENSOLUS partner). We achieve this by providing you with:

- ✓ Product updates, consisting of:
 - Seasonal release updates: a quarterly communication describing (upcoming) updates to the Solution within one seasonal release.
 - Release notes: a communication containing a detailed overview of the updates that have been made to our Solution offering.
- ✓ Partner trainings, such as (mailings pertaining to):



	Topical webinars: webinars about a specific industry segment (e.g. waste industry) or an important		
	topic in our industry (e.g. NB-IoT) which may be relevant to you.		
	Seasonal release webinar: a quarterly webinar on the (upcoming) updates to the Solution within one		
	seasonal release.		
	Sales onboarding: an onboarding training dedicated to your company's sales team.		
	Technical onboarding: an onboarding training dedicated to your company's technical team.		
Partner portal access			
	The partner portal includes product, marketing and sales related documentation to ensure you are up-		
	to-date about our Solution offering and have the right material at hand to train your company's staff		
	internally and to provide your company's potential customers with extra documentation relating the		

✓ Partner newsletter

Solution.

Our partner dedicated newsletter with various content (e.g. new features available, Solution highlights, etc.).



It is in our (and your) legitimate interest to keep you informed.

We will collect, store and use your personal for the purpose on informing you on our Solution because we have a **legitimate interest** to do so. However, we will always make sure to

- assess whether this is in proportion with the purpose for which your personal data was collected and used;
- ✓ to take your reasonable expectations into account and ensure a balance with your fundamental rights and
 freedoms.

If we cannot guarantee this, we will stop storing/using your personal data or determine a new legal ground.



How long do we need your personal data?

Unless longer storage is legally required, we will use and store your personal data for as long as:

- ✓ you are a SENSOLUS partner (i.e. a signed partner agreement is in place);
- ✓ you are employed by a SENSOLUS partner and/or are identified by that partner as a point of contact;
- ✓ you have not objected to all or any of the mailings/updates specified above by using our "Objection form"
 (please see below).



Security is important to us

We securely store your personal data in Azure Active Directory.

We undertake reasonable, physical, technological and organisational precautions in order to avoid (i) unauthorised access to your personal information, and (ii) loss, abuse or alteration of your personal data. For the specific security measures taken by Azure Active Directory, we refer to <u>Azure's Active Directory Data Security Considerations</u>.



It takes three to tango.

To ensure that you receive all necessary information, updates and (notifications of) trainings in a timely manner, we rely on the services of certain third parties to ensure that everything goes according to plan. These third parties may receive your personal data if this is necessary for the performance of their task(s). The third parties involved are:

Salesforce Customer Relationship Management system
 Mailchimp Marketing Platform

✓ Zoom Video conferencing tool

✓ Sharepoint Cloud-based service to share content and knowledge

Zendesk Helpdesk Software

✓ <u>Teamleader</u> Work Management Software

Of course we have made sure that the necessary contracts or similar legal binding acts are in place to ensure that these third parties treat your personal data in accordance with applicable privacy legislation.

In addition, we might transfer your personal data:



To competent for instance, because (i) we are obliged to provide your personal data under law or in the authorities: scope of (future) legal proceedings, or (ii) if this is necessary to safeguard our rights

✓ In M&A meaning, if SENSOLUS or the majority of its assets, is taken over by a third party, in which context: case your personal data – which SENSOLUS has collected – may be one of the transferred assets.

In case any of the above third parties | recipients are located in a country **outside the European Economic Area**, we will ensure that one or more of the listed EU-approved safeguards are in place

✓ European Commission adequacy decision

- ✓ **Data transfer agreement** (cfr. the European Commission's Standard Contractual Clauses)
- ✓ Binding corporate rules
- ✓ Other valid certification mechanism



Your privacy rights, your power:

The GDPR gives you certain rights over your personal data vis-à-vis SENSOLUS. You can exercise these rights by contacting us, as specified below, by using the **form for exercising your rights** (as attached to this Privacy Policy).

✓ **Right to access:** you can ask us to give you copies of your personal data. We may charge you

a small fee for this service.

✓ Right to rectification: you can ask us to correct/complete any information you believe is

inaccurate or incomplete.

✓ **Right to erasure:** you can ask us to erase your personal data.

✓ Right to object: You can object to us processing your personal data.

Right to restrict processing: you can ask us to restrict the processing of your personal data.

✓ Right to data portability: you can ask us to transfer your personal data to another organization, or

directly to you.

If you no longer wish to receive our partner newsletters or our mailings on product updates, partner trainings, partner portal access, **you can OBJECT to these mailings** ('Right to object') by using our Objection Form (which can be found via the link in each partner mailing). Upon receipt of a completed and accurate Objection Form, we will stop processing your personal data for the respective partner mailing(s). Please note that this is without prejudice to your obligation, as a SENSOLUS partner, to remain sufficiently informed on the ins and outs of the Solution.



Complaints | Your authorized supervisory authority

Are you not satisfied with the manner in which we collect, store or otherwise treat or secure your personal data? We are sorry to hear that, and are prepared to take all measures to remedy this situation. Please do contact us as specified at the bottom of this Privacy Policy.

You also have the right to lodge a complaint with the authorized supervisory authority (the **Belgian Data Protection Authority**) by sending an email to contact@apd-gba.be or any other email address provided by the authorized supervisory authority (https://www.dataprotectionauthority.be/contact-us).



How can you contact us?

We are always happy to hear from you! You can contact us via one the following channels:

✓ By telephone: +32 9 298 13 93

✓ Contact via our Website: https://www.sensolus.com/contact/

✓ By email: <u>legal@sensolus.com</u>

√ By post | dropping by at: 9000 Ghent, Moustraat 54, Belgium (addressed to: Laurence Claeys)



EXERCISE OF THE RIGHTS OF THE DATA SUBJECT FORM				
I.IDENTIFICATION OF THE PARTIES				
	Controller	Data subject/you		
Name	SENSOLUS NV			
Address	Moutstraat 54, 9000 Gent (BE)			
VAT number	0543.551.277	/		
II. WHICH	RIGHTS DO YOU WISH TO EXERCISE?			
☐ Right of access to personal data which SENSOLUS possibly holds on you*				
If SENSOLUS processes your personal data, what information would you like to obtain?				
☐ The categories/nature of your personal data processed by SENSOLUS				
☐ The reason or reasons why SENSOLUS processes your personal data				
☐ The recipients or categories of recipients to whom SENSOLUS has disclosed or will disclose your personal data (i.e. recipients in third countries or international organisations)				
☐ The origin of your personal data (i.e. where and how did SENSOLUS obtain your personal data)				
☐ The existence or not of automated decision-making (including profiling) with regards to your personal data and, if relevant, meaningful information about the logic involved, the significance and the envisaged consequences of such processing for you				
☐ Where possible, the envisaged period for which your personal data will be stored or, if not possible, the criteria used to determine that period				
☐ Right to rectificati	on of your personal data*			
- Which (inaccu	rate) personal data do you wish to rectify?:			
a rectification: a rectification:				
	à rectification:			
- Which incomplete personal data do you wish to have completed?				
	à completion:			
	à completion: à completion:			
☐ Right to erasure/		Col. Cil		
Following your request, SENSOLUS will erase your personal data without undue delay where one of the following grounds applies:				
☐ Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed				
☐ You have withdrawn your consent with regards to the processing and there exists no other legal ground for the processing				
☐ You object to the processing and there are no overriding legitimate grounds for the processing or you object to the processing for direct marketing purposes				
☐ Your personal data have been unlawfully processed				
☐ Your personal data have to be erased for compliance with a legal obligation which exists on the part of SENSOLUS				
☐ Your personal data have been collected in relation to the offer of information society services				
☐ Right to restriction	n of processing*			
You wish SENSOLUS to limit the processing of your personal data and one of the following grounds applies:				
☐ You contest the accuracy of your personal data. Your personal data will not be processed for the period enabling SENSOLUS to verify the accuracy				
☐ The processing is unlawful and you oppose the erasure of your personal data and request a restriction of the use of your personal data instead				
☐ SENSOLUS no longer needs your personal data for the purposes of the processing but you require them for the establishment, exercise or defence of legal claims				





☐ You have objected to processing your personal data and pending the verification whether the legitimate grounds of SENSOLUS override yours, SENSOLUS will not process your personal data	
☐ Right to portability of your personal data*	
☐ You wish to receive the personal data – which you provided to SENSOLUS – in a structured, commonly used and machine-readable format	
☐ You wish that SENSOLUS transfers your personal data to another controller for processing and one of the following grounds applies:	
☐ The processing is based on your consent	
☐ The processing is carried out by automated means	
<u>Note:</u> The transfer by SENSOLUS will only take place when it is technically possible for SENSOLUS to do so	
☐ Right to object*	
☐ The processing of your personal data (including profiling) occurs (i) for the performance of a task carried out in the public interest (ii) in the exercise of official authority vested in SENSOLUS or (iii) on grounds of the legitimate interests of SENSOLUS or a third party and you wish to object to the processing of your personal data on grounds relating to your particular situation.	
Please clarify what the reason(s) is/are for your objections:	
<u>Note:</u> SENSOLUS shall no longer process your personal data unless SENSOLUS demonstrates compelling legitimate grounds for the processing which over your interests, rights and freedoms or for the establishment, exercise or defence of legal claims	
☐ You wish to object to the processing of your personal data for direct marketing purposes (including profiling related to such direct marketing). More specifically, you wish that:	
☐ SENSOLUS erases all your personal data from its filing systems. SENSOLUS will contact you again in future if access is regained to your personal data from a third party	
☐ SENSOLUS does not process your personal data anymore for direct marketing purposes and ensures that you will never receive direct marketing again from SENSOLUS or its partners	
III. REACTION OF SENSOLUS TO YOUR REQUEST	
SENSOLUS shall provide without undue delay and in any event within one month of receipt of your request, information on action taken on your request.	
Depending on the complexity of your request and the number of requests, that period may be extended by two further months where necessary. In that case, SENSOLUS will inform you within one month of receipt of your request.	
If SENSOLUS does not take action on your request, SENSOLUS will inform you within one month of receipt of your request and, in addition, SENSOLUS will provide the reasons for not taking action on your request. SENSOLUS will also inform you on the options to (i) lodge a complaint with a supervisory authority or (ii) seek a judicial remedy.	
IV. PROOF OF YOUR IDENTITY	
To prove your identity, you must include a copy of your identity card with this form (cfr. privacy policy)	
If SENSOLUS has reasonable doubts concerning your identity, SENSOLUS may request the provision of additional information necessary to confirm your identity.	
V. SIGNATURE DATA SUBJECT	
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