

PRIVACY POLICY

This Privacy Policy governs the processing of your personal data on the basis of the General European Data Protection Regulation (GDPR) by Koalift ASBL in connection with your visit to our website <https://koalift.com/> (hereinafter: "Website"), your use of our Koalift application which can be downloaded via Google Play and the Apple App Store (hereinafter: "Application"), or your communication with us by e-mail, telephone, fax and our social networks (such as Facebook, Google, Twitter and LinkedIn, hereinafter : Social Media).

If you would like more information on how we handle personal data via cookies, social plug-ins and other types of tracking technology, please see our cookie policy:

<https://koalift.com/documents/cookies-en.pdf>

1 WHO ARE WE?

- 1.1 Your personal data are processed on the basis of the applicable data protection legislation by Koalift ASBL, Cantersteen 12, 1000 Brussels, Belgium (hereinafter: "Koalift", " we", "us", "our"). You can contact us by e-mail at hello@koalift.com.
- 1.2 Where reference is made in this Privacy Policy to laws or regulations, any changes to such laws or regulations are implicitly included.
- 1.3 We reserve the right to modify and adapt this Privacy Policy on our own initiative. In this case, these modifications and adaptations will be communicated to you via our Website and our Application. Any further use of our Website or Application will be subject to the modified Privacy Policy.

2 WHAT PERSONAL DATA DO WE PROCESS?

- 2.1 When you **use our Website or Social Media channels**, we process the following information:
 - Technical information, such as information about your device, IP address, browser type, geographical location, operating system, page response times, download errors;
 - Navigational information, such as Uniform Resource Locators (URLs), navigational paths to, through and from our Website (including date and time) , the pages you viewed, the length of time you spent on certain pages, page interaction information (such as scrolling, clicks and hovers), and methods used to leave the page.
- 2.2 When you **register in our Application**, we process:
 - Technical information: such as information about your device, Ad-ID and IP-address.
 - Your location;
 - Identity information that you provide us with, such as your first name, last name, gender;

- Your contact details: your telephone number, your e-mail address and your address;
 - Your transport possibilities;
 - The identity information of your children that you provide us with, such as their first and last names, gender and dates of birth.
- 2.3 When **you use our Application**, we process:
- Navigation information, the navigation path through our Application (including date and time), the pages you visited, the length of time you spend on certain pages, page interaction information (such as scrolling, clicks and hovers).
 - Information relating to the communications you send on our Application, such as the message itself, the users to whom the message is sent, the time and date of the communication;
 - The communities of which you are a member;
- 2.4 When you contact us by filling out a contact form on our Website, Application or by email, telephone, fax or Social Media, we will process your request and:
- Identity information that you provide us with, such as your first name, last name, date of birth;
 - The contact details you provide us with, such as your e-mail address, postal address, country and (mobile) telephone number;
 - Content of the communication, such as your question or complaint;
 - Technical communication information, such as the name of the person you are communicating with at our end, the date and time of the communication or the telephone number used to call our customer service department;
 - Any other personal data you provide us with.
- 2.5 When you **register on the Website** as a **community**, we process:
- The identity information of the person responsible that you provide us with, such as his or her first and last name, e-mail address and telephone number.
 - the financial information of the person making the payment, such as your first and last name, card number, expiry date and security code.
- 2.6 We receive most of your personal data directly from you, but we may receive additional information about your preferences and browsing behaviour from partners such as LinkedIn, Google, Twitter or Facebook. If you would like more information about the personal data that these parties process about you and make available to others, please consult their respective privacy policies.
- 2.7 Our Website may also contain links to other Websites. Koalift is not responsible for the privacy policies of third party websites and recommends that you consult the privacy each website you visit.

3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA AND WHAT IS THE LEGAL BASIS?

3.1 In the table below, we explain the purposes for which we process your personal data and on what legal basis we do so. We rely on the following legal bases:

- Your consent, in which you are informed of what this consent means before you freely give your consent;
- A contract with you, in order to execute that contract or to take action before entering into a contract with you;
- A legal obligation that we must comply with;
- Our legitimate interest, such as the continuous improvement of our Website, Application, Social Media, products and services to ensure that you have the best possible experience, to keep them safe from abuse and illegal activities, to promote them and to make them available to you.

OBJECTIVE	LEGAL BASIS
We process your personal data to <u>send you advertising for our services</u> , such as communications, promotions, offers and newsletters, by e-mail or other electronic person-to-person communication channels if you have explicitly consented to receive such advertising.	Your Consent
We process your personal data <u>to show you personalised marketing</u> related to Koalift and our carefully selected partners in the Application, on our Website and on our Social Media.	Your Consent
In connection with the sending of advertisements, such as communications, promotions, offers and newsletters, by e-mail or other electronic person-to-person communication channels, we process your personal data to <u>collect information to analyse our advertising</u> , such as the content of the advertisements you have accessed or the links you have clicked on (for <i>example</i> , through tracking technologies such as web beacons in our e-mails).	Your Consent
We process your personal data to <u>perform statistical analyses</u> in order to improve our Website, advertising, products and services or to develop new products and services.	Your consent

We process your personal data in order to provide you, in a personalised and efficient manner, with the services or information you request via our Application, Website, e-mail, telephone, fax or Social Media.

A contract with you

We process your children's personal data, which you have provided in the Application, in order to provide you with the services.

A contract with you

We process your personal data:

A legal obligation

- to comply with the legal obligations we have to comply with, or

- to comply with any reasonable request from competent officials or representatives of law enforcement, judicial authorities, government agencies or bodies, including competent data protection authorities, or

- to transfer your personal data to the police or judicial authorities on our own initiative as evidence or if we have justified suspicions of an illegal act or crime you have committed using our Website, social media or other communication channels.

We process your personal data to protect our legitimate interests or to protect the legitimate interests of a third party in the event that your use of our Website, Application, Social Media or other communication channels may be considered:

We have a legitimate interest in ensuring the security of our online presence.

- a breach of the applicable Terms and Conditions Use of our Application and Website or of the intellectual property rights or any other of our rights or those of a third party, or
- any danger or threat to the security or integrity of our Application, Website, Social Media or other communication channels or any of our computer systems, selected partners or third parties due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or
- in any way that is hateful, obscene, discriminatory, racist, defamatory, malicious,

hurtful or otherwise inappropriate or unlawful.

4. TO WHOM DO WE SEND YOUR PERSONAL DATA?

- 4.1 We may also use third parties to process your personal data for the purposes described in Article 3 above, for example:
- To provide you with our Website and Application; or
 - to target our advertising (such as a marketing company); or
 - To process your payment if you wish to register as a community (e.g. a payment service provider or credit check agency).
- 4.2 These third parties are only authorised to process your personal data on our behalf and in accordance with our explicit written instructions. We also guarantee that all such third parties are carefully selected and undertake to respect the security and integrity of your personal data.
- 4.3 We may be legally obliged to share your personal data with relevant law enforcement officials or representatives, judicial authorities, government agencies or bodies, including data protection authorities, to comply with a legal obligation as set out in Article 3.
- 4.4 We do not pass on your personal data in an identifiable manner to third parties other than those mentioned in Articles 4.1 and 4.2 without your explicit consent to do so. You understand, however, that if you use our Social Media, also to log into the Application, your personal data is also processed by Social Media providers. In addition, other users of the Application and communities can view your profile on the Application. This means that they can see your name and transport options and, if you do not choose to hide them, your address and the name, age and gender of your children.

5. WHERE DO WE PROCESS YOUR PERSONAL DATA?

- 5.1 We process your personal data only within the European Economic Area (EEA).

If necessary for the purposes set out in Article 3 above, we may also transfer your personal data to third parties who process your data on our behalf outside the EEA. Each entity outside the EEA that processes your personal data will be required to comply with adequate safeguards with respect to the processing of your personal data. Such safeguards may result from the following measures:

- The beneficiary country has legislation that can be considered equivalent to the protection offered in the EEA; or
- A contractual agreement between us and this entity, including the EC Standard Contractual Clauses (from controller to controller) (Commission Decision C(2004)5721).

- 5.2 We may transfer anonymous and/or aggregated data to organisations outside the EEA. If any such transfer takes place, we will ensure that there are safeguards in place to ensure the security and integrity of your data and any rights relating to your personal data that you may have under applicable mandatory legislation.

6. WHAT QUALITY GUARANTEES DO WE COMPLY WITH?

- 6.1 We do our best to process only those personal data that are necessary to achieve the purposes listed in Article 3.
- 6.2 Your personal data is only processed for as long as is necessary to achieve the purposes listed in Article 3 above or until you withdraw your consent to its processing. Your withdrawal of consent may mean that you can no longer use all or part of our Website or Application. We will depersonalise your personal data when it is no longer necessary for the purposes set out in Article 3 above, unless there is:
- An overriding interest of Koalift, or any other third party, in retaining your personally identifiable information; or
 - A legal or regulatory obligation or a judicial or administrative order that prevents us from depersonalizing them.
- 6.3 You understand that an essential aspect of our marketing efforts is to make our marketing materials more relevant to you. We do this by customizing your unique profile with relevant features and then using it to provide you with communications, promotions, offers, newsletters and other advertising about Services that may be of interest to you.
- 6.4 We will take appropriate technical and organisational measures to protect your personal data against unauthorised access or theft, as well as accidental alteration or destruction. Access by our staff or by staff of third parties will be on a need-to-know basis only and will be subject to confidentiality obligations. You understand, however, that safety and security are obligations of means that can never be guaranteed.
- 6.5 If you are registered to receive commercial communications, by e-mail or other electronic means of person-to-person communication, such as recommendations in the Application, you may change your preferences for receiving such advertising by clicking on the opt-out link provided in that advertisement.

7. WHAT ARE YOUR RIGHTS?

- 7.1 You have the right to request access to all personal data we process about you. We reserve the right to charge a reasonable administrative fee for multiple subsequent requests for access which are clearly submitted to us for nuisance or prejudice. Each request must specify for which processing activity you wish to exercise your right of access and to which categories of data you wish to have access.

- 7.2 You have the right of rectification, *i.e.* you have the right to request that any personal data concerning you that is inaccurate be rectified free of charge. If you submit a request for rectification, your request must be accompanied by proof of the incorrect nature of the data for which correction is requested.
- 7.3 You have the right to withdraw your previously given consent for the processing of your personal data.
- 7.4 You have the right to erase, *i.e.* to request that your personal data be deleted if they are no longer necessary for the purposes referred to in Article 3 above or if you withdraw your consent to their processing. However, you should bear in mind that a request for deletion will be assessed by us, taking into account:
- Our interests and those of third parties that may outweigh your interests; or
 - Legal or regulatory obligations or administrative or judicial orders that may contradict such removal.
- 7.5 You have the right to limit the processing of your personal data instead of deleting it, *i.e.* to ask us to limit it if:
- We verify the accuracy of your personal data; or
 - The processing is unlawful and you object to the deletion of your personal data; or
 - You need your personal data to establish, exercise or defend a legal claim, whereas we no longer need your personal data for the purposes listed in Article 3 above; or
 - We shall verify whether our legitimate interests outweigh your interests if you exercise your right to object in accordance with Article 7.6.
- 7.6 You have the right to object to the processing of personal data if:
- The processing is based on our legitimate interest within the meaning of Article 3 above; and
 - You are able to show that there are serious and justified reasons relating to your particular situation which justify such an objection; and
 - Our legitimate interests do not outweigh your interests.
 - However, if the planned processing is qualified as direct marketing, you have the right to object to such processing free of charge and without justification.
- 7.7 You have the right to data transferability, *i.e.* to receive from us, in a structured, commonly used and machine-readable format, all the personal data you have provided us with if the processing is based on your consent or on a contract with you pursuant to Article 3 above.
- 7.8 If you wish to submit a request to exercise one or more of the rights listed above, you may contact the responsible persons for data protection by sending an email to hello@koalift.com. An e-mail requesting the exercise of a right will not be interpreted as

consent to the processing of your personal data beyond what is necessary to process your request. This request must comply with the following conditions:

- Indicate clearly which right you wish to exercise; and
- Clearly state the reasons for exercising your right, if any; and
- Your application must be dated and signed; and
- Your application must be accompanied by a scanned copy of your valid identity card proving your identity. If you use the contact form, we may ask for your signed confirmation and proof of identity.

We will inform you promptly upon receipt of your request. If the request meets the above conditions and proves to be valid, we will honour it as soon as possible and no later than thirty (30) days after we receive your request.

If you have any complaints about the processing of your personal data by us, you can always contact the responsible persons for data protection by sending an e-mail to hello@koalift.com. If you are still not satisfied with our response, you can lodge a complaint with the competent data protection authority, Belgian Data Protection Authority. For more information, please visit <https://www.dataprotectionauthority.be/>