

Data Privacy Policy - Digiteal

From a personal perspective, we are citizens and we care about our personal data.

From a business perspective, we are citizens and we are the Digiteal team; we care about our personal data as well. Therefore the protection of your private data is a key point for us.

Hereby we would like to provide you with details of what information we collect, when and for what purpose, and how we process and use it.

Digiteal will not sell your personal data.

The basics of data privacy protection

The law

The Law of 8 December 1992 (Privacy Law on the Protection of Privacy with regard to the Processing of Personal Data) aims to protect the citizen against any misuse of his or her personal data. It defines not only the rights and duties of the person whose data is processed but also those of the person responsible for such treatment.

Information concerning legal persons is not subject to this form of protection. Personal data is personal information of a personal or real nature that may be related to your person (example: name + email address + phone number). Information that can not really be linked to your identity (anonymised data) is not part of it.

This law will evolve with the entry into force from May 2018 of the General Regulations on Data Protection (RGPD, GDPR) which will be more binding than the current law. We have chosen to base ourselves directly on this future, more restrictive regulation on the protection of personal data.

Transmission of personal information to third parties

We do not pass on your data to third parties for advertising purposes. Third parties only receive your personal information in the manner described by Digiteal in the privacy provisions.

What do you not see when visiting our website?

Each time you visit our website (request or attempt to request data from our server), the information concerning this request is stored in a log file (Logfile).



In particular, the following data is recorded for each request:

- IP address
- Name of requested data
- Date and hour of the request
- Volume of data transmission
- Indication of successful completion
- Indication why an application has failed
- Operating system and browser software on your computer
- Screen resolution
- Browser language
- Color depth
- Plugins of the browser (JavaScript, Flash Player, Java, Silverlight, Adobe Acrobat Reader etc.)
- As well as the website from which you consult us.

For statistical purposes, the data is stored in log files (Log-Files). We can not link the recorded data to your person. Nor do we pass the data on to third parties. It is only in case of breach of the law that we reserve the right to transmit certain registrations to the competent authorities to allow the prosecution of the offenses.

Usage of Cookies

On our website, we use so-called "cookies" to offer you an optimal comfort of use (example: language of navigation).

Cookies are text files that are saved from the browser software on your computer and that contain information about your visit to our website. Other cookies are used for statistical reasons. These remain permanently on your computer as long as you do not erase them. These cookies do not allow the detection of personal information.

Cookies are allowed in the standard setting of your browser. Therefore, you do not need to activate any special settings to be able to save cookies on your computer. If you want to disable cookie registration, you can view the help function in the navigation bar of your browser. However, be aware that by disabling cookies, you limit the use of the website. We advise you to authorize the use of cookies because you may otherwise restrict the functionality of the website.

Google Analytics uses internal cookies to generate reports on user interactions with Google Analytics client websites. These cookies are used to store information that does not personally identify users. Internal cookies stored in browsers are not valid from one domain to another.

What do you not see when you use our platform?



In addition to the privacy statements on our website (see above), we would like to inform you of the following:

Linking a bank account:

- To take full advantage of the Digiteal billing and payment platform, you will be offered to link one or more of your bank accounts.
 - Since Digiteal is recognized as a banking institution by the Belgian National Bank, our company is subject to the various rules applicable to the sector, such as the fight against money laundering, combating the financing of terrorism, etc.
- For these reasons, we are legally obliged to identify the natural person linked to the bank account of the latter or linked to a legal person. In this context personal data are requested such as:
 - Identification via identity card
 - Last Name/First Name
 - Address
 - Bank account(s)
 - "KYC" (Know Your Customer) Rules

Bill presentment

 When a new invoice is presented, an acknowledgment of receipt will be sent to the issuer of the invoice

"One-Click-Pay"

 Information about the status of the payment will be sent to the creditor of the invoice (the issuer): payment initiated, outstanding, paid, rejected payment, programmed automatic payment.

What do you not see when using our app?

Privacy Statements for the Use of the Digital APP

To take advantage of Digiteal's services, we provide you with a mobile app.

In addition to the statements on privacy in relation to the web platform (see above), we would like to inform you of the following points :

- When using the app, we collect the following personal data for statistical purposes and to improve the functions of the app :
 - identification of your device, your mobile device number / PUSH (IMEI = International Mobile Equipment Identity),
 - Your IP address (in case of onboarding on the platform).

We do not pass your data to third parties.

- In order to make the app work properly, the app uses the following functions and sensors via the interfaces of your mobile device :
 - Localization information: When you use the app outside of the European Union, we may collect and process information about your location in real time, if you have enabled the



location function for this app beforehand on your mobile device. We use different technologies such as IP addresses, GPS or other sensors to locate you.

- The purpose of this processing is for the purposes of potential evaluation of fraud and alert generation in our system.
- If your mobile devices has a camera, the latter is used to scan QR Codes. It can also be used to do pictures of your identity documents while subscribing to the service.
- When the app's messaging service is enabled, you receive push notifications on your mobile device. This service saves your linked keywords and the push ID of your mobile device in a database. The sending of messages is done through the push services of Apple (iOS devices) or Google (Android devices).
- The wireless connection of your mobile device is used by the app to establish a connection to the Internet.
- By accessing other functions and sensors on your mobile device, the app can access data from the internet and process error messages.
- In the event that you consult the websites of partners (billers) from the Digiteal platform, the privacy policy in force on these sites is independent of that of Digiteal.

Why collect and process this data?

Personal data is only used when you make it available to us, for example when you subscribe to our newsletter, when you make a request on our contact page or when you register on the Digiteal platform to take advantage of ot services.

The information provided is transmitted in a safe manner. This protects the communication between your computer and our web server, and this makes it possible to prevent the misuse of data by third parties. For encryption, we use SSL (Secure Socket Layer), a system recognized and widely used on the Internet, which is also used by banks and the current version of which still offers the necessary security.

All personal data on our website is collected, processed and used on our website in accordance with the legal provisions concerning the protection of personal data and only for the provision of the services requested by you and for the processing of your requests. As part of payments processing, we work with a banking partner. This bank is contractually bound and has an obligation to respect these rules of protection of the private life.

What rights do you have regarding the transmitted data?

As Digiteal is **responsible for the processing** of personal data, you can ask your questions via the contact form.

As a customer, you can always question us about your personal data and ask what data it is (your personal data is what you give us).

You have the possibility to ask for the right to the deletion of your data, or the right to forget.



Digiteal (Teal IT S.A). Rue Emile Francqui 6/9 1435 Mont-Saint-Guibert Belgium

Log: 01/10/17 - V1.0