1. General

Combell nv, with registered office at Skaldenstraat 121, 9042 Ghent and registered with the CBE under number 0541.977.701 (hereinafter " **Combell**"), considers the protection of personal privacy to be extremely important. Combell wishes to inform its customers and users as much as possible about its services, while respecting their data and giving them control over what happens to them. Combell wants to manage and use its customer data safely, respectfully and with due diligence in order to provide better service to its customers and to offer the best possible experience. Combell therefore starts from the principle that everyone must have control over their personal data. Below, you will find information about what data Combell collects, why, how long for and how you can control it.

Combell invites its customers to take the time to thoroughly review this Privacy Policy, together with the General Terms and Conditions for Managed Hosting & Cloud Services and any other conditions that may apply to its products and services.

2. Applicability

This Privacy Policy applies to all our customers (current, former and future) and to all visitors to the Combell website(s).

The European General Data Protection Regulation 2016/679 of 27 April 2016 ("General Data Protection Regulation"), the law of 30 July 2018 ("Law for the protection of personal information"), the law of 13 June 2005 ("Electronic Communications Act") and the accompanying implementing decrees, as well as any future changes hereto, regulate the protection of your personal data.

Combell strives to fulfil its obligations and to respect the rights of the customer whenever Combell processes your personal data. For more information about this, Combell would like to refer you to the website of the Commission for the Protection of Privacy [https://www.privacycommission.be/en].

3. Processing of personal data and responsibilities

"Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The personal data that Combell collects and processes, primarily concerns the data that customers enter themselves via the various pages of our website(s) and that Combell obtains through your use of our website(s) and/or our products and/or services.

Combell acts as the responsible party for processing the personal data of its customers for the purposes as described in this Privacy Policy.

This does not detract from the fact that the customer has a number of obligations in connection with the processing of personal data that allows the customer to use Combell's products and services. In this capacity, the customer must always obtain, where necessary, the legally required authorisations from the end users for the processing of their personal data by Combell insofar as necessary within the framework of Combell's products and services.

4. Purposes

Combell processes personal data for various purposes, whereby the only data processed is that which is necessary to achieve the intended purpose.

Thus, we use personal data:

- When we have received permission;
- In the context of the preparation or performance of our contract;
- To comply with the legal or regulatory provisions to which we are subject; and
- When Combell has a justified interest in this, such as, for example, as the case may be, direct marketing, fraud prevention, internal administration management or monitoring of appropriate network and information security, in which case we always strive for a balance between that interest and respecting the privacy of the person concerned.

Insofar as required, and with permission, Combell collects personal data for the following concrete objectives:

To process an application for our products and services.

If you visit our website to collect and/or request information about our products and services, or if you sign up for Combell's newsletter, for example, then Combell needs your address details. All information that Combell receives about you during this pre-contractual phase will only be used by Combell to provide you with the requested information, in the way that you want. In addition, if you ultimately decide to become a customer at Combell, Combell will ask you for a number of personal details, such as name, address, telephone number, e-mail address and customer number, and Combell will also assign certain data to you, such as login details.

To provide the best service and to inform about usage options.

Combell uses personal data for setting up, maintaining and supporting products and services, and for administrative purposes.

To provide information about (new) products and services from Combell.

Combell may use personal data to offer (in writing, by telephone or electronically) new products, services or special promotions that Combell believes may be of interest to you. Of course, you can opt out of this type of message (see further).

To track performance.

Combell may use personal data and consumer profiles to evaluate its products and services. This includes, among other things: requesting feedback on services (for example, via market research), data obtained during answers to customer questions, fraud detection and quality assurance.

To comply with legal obligations.

In many cases, Combell is legally obliged to keep certain personal data and/or communicate them to government agencies, for example, in the context of general tax and accounting obligations. In the context of a police or judicial investigation, Combell can be obligated to communicate certain data to the requisite authorities in a confidential manner.

To keep track of studies, tests and statistics, including for trend analysis.

Combell may use anonymous, aggregated data to, for example, report internally and externally on the use of its services. The data used for this cannot be traced back to a specific individual. The information that Combell derives from these analyses is used to evaluate the current products and services portfolio and Combell's processes, and to adapt them to new developments.

5. Security

Combell strives at all times to protect personal data and privacy, both in its physical offices and on the Combell network. Combell ensures appropriate organisational and technical measures to secure personal data.

Combell's employees are trained to deal with confidential data correctly. In the case of privacy-sensitive projects, an assessment is also made with regard to security and the protection of personal data. Combell's information security policy, requirements and management standards are in fact fully modelled on the international ISO 27001 standard, for which Combell has been certified since 2011. For the security of data, Combell employs specific people who monitor compliance with legislation and ethical aspirations. Combell also employs specialised personnel who are responsible for the security of the network, infrastructure and information systems. In addition, Combell uses a variety of technical measures to protect personal data, such as: password protection, hard disk encryption software, firewalls, antivirus software, intrusion and anomaly detection system and access control systems for employees.

If a data breach should occur with adverse consequences for personal data, the customer is personally notified under the conditions provided for by law.

The number of Combell employees who have access to personal information is limited and they are carefully selected. These employees are granted access to personal information insofar as they need this information to perform their duties properly.

The existence and content of the personal communication that takes place via the Combell network (for example: email traffic, hosting...) is protected by the provisions for telecommunications secrecy. This means that Combell and its employees may not have any knowledge of the existence or content of such communication, outside of the exceptions enumerated by the law.

Combell's websites sometimes mention links to third-party sites (social media, organisers of events sponsored by Combell) whose terms of use do not fall within the scope of this Privacy Policy. Please read carefully their policy on the protection of personal data.

6. Provision of data to third parties

Combell does not sell personal data to third parties nor is data passed on to third parties unless:

To our legal successors and other companies within the Combell group.

Combell passes on personal data to any legal successors and affiliated companies (such as subsidiaries and sister companies) for the same purposes as those stated in this Privacy Policy.

This is necessary for our service provision.

For some aspects of our products and services, we cooperate with third parties or engage sub-contractors. These third parties are always selected very carefully and there is always an agreement between Combell and these third parties in accordance with the applicable legislation. Thus, Combell uses, among others, service providers for domain name registrations, e-mail service providers, SSL certificate providers, providers of cloud connect services, providers of sitebuilder services, providers of online desktop services and providers

of online fax services. For more information about our sub-contractors, you can always contact us via the contact details under point 10.

If you purchase from Combell a (online) product or service from a manufacturer or supplier based outside the European Union, it is possible that additional measures are necessary to ensure the security of personal data, such as a certification under the EU-US Privacy Shield and/or a processor agreement with model clauses drawn up by the European Commission.

When a person refuses to have his details passed on, it is possible that some services can no longer be offered by Combell.

There is a legal obligation.

For this, Combell refers you to point 4 of this Privacy Policy.

There is a legitimate interest for Combell or the third party concerned.

This only happens providing the interests or fundamental rights and freedoms of the person concerned do not override that interest.

Combell has received permission from the person concerned.

If Combell should provide personal data to third parties by other means, this will be done with an explicit communication, in which an explanation about the third party is given, together with the purposes of the transfer and processing. Where required by law, Combell obtains express and unambiguous consent from the data subject. The data subject also always has an option to object (see below).

In regard to the international transfer of personal data, Combell protects all personal data in accordance with the level of protection required by European regulations.

In some cases, Combell uses anonymous, aggregated data for commercial purposes or for external reporting. This data can never be traced back to a specific individual.

7. Rights of the data subjects

You can exercise a number of rights regarding the processing of your personal data with respect to Combell, insofar as you have those rights under the applicable legislation.

You can exercise these rights by using the contact details mentioned under point 10 of this Privacy Policy. Combell will respond to such requests and may or may not comply with such requests in accordance with applicable law and in principle within a period of one (1) month, also in accordance with applicable law.

In order to exercise your rights and to prevent any unauthorised disclosure of your personal data, you must provide us with proof of your identity. We therefore ask that you preferably attach a copy of the front of your identity card to your application. The application can be sent using the details mentioned under point 10 of this Privacy Policy.

If you consider it necessary, you can also contact, or file a complaint with, the Data Protection Authority (Belgian Privacy Commission) (commission@privacycommission.be).

Right of objection

You have the right to object at any time to the processing of your personal data based on the legitimate interest of Combell on grounds relating to your particular situation. If you object, Combell will no longer process such personal data unless Combell demonstrates compelling legitimate grounds for the processing

that override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Right of access and transparency

You have the right to access the data (free of charge) that relate to you and to obtain a copy of these personal data. You can also ask us:

• Whether we process personal data about you;

• For what purposes we process them;

• Which categories of personal data we process;

• With which categories of third parties we share your personal data;

• What the origin of the processed data is;

• What your rights are.

Right to rectification and erasure

As a data subject, you are entitled to have incomplete, incorrect, inappropriate or outdated personal data corrected or supplemented. For this purpose, our customer service can be contacted from a registered address or your data can be amended via the online portal "my.combell.com". In order to keep your data up to date, we request that you notify us of any changes, such as if you move house.

You also have the right, without undue delay, to have your personal data deleted if and insofar as:

1. the personal data are no longer required for the purposes;
2. there is no longer a legal ground for the processing;
3. you object to the processing, and there are no overriding legitimate grounds for the processing by Combell;
4. the personal data have been unlawfully processed; or
5. the personal data must be erased for compliance with a legal obligation that applies to Combell.

Combell will send you a confirmation message after complying with a request for erasure. In the case of partial erasure, Combell will also explain why the request could not be fully met.

Depending on the nature of the request, it is possible that some services can no longer be offered by Combell. Combell is also not always able to erase all requested data, for example, to comply with legal obligations (e.g. in order to meet accounting and fiscal obligations, Combell is required to retain invoicing data for a maximum of 7 years).

Right to restriction of processing

As a data subject, you also have the right to have Combell restrict the processing of your personal data, if and insofar as one of the following applies:

1. you contest the accuracy of the personal data, in which case the processing is limited during a period enabling Combell to verify their accuracy;
2. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
3. Combell no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
4. you have objected to processing, pending the verification whether the legitimate grounds of Combell override those of the data subject.

In case of restriction of processing, the data may still be stored by Combell.

Right to data portability

For personal data that are (i) processed in the context of the performance of the agreement, (ii) provided by yourself and (iii) processed through automated processes, you as a data subject have the right to obtain these data from Combell in a structured, commonly used and machine-readable format, and to request Combell to transmit those data directly to another party, providing technically possible, if you wish to switch providers.

8. Retention periods

Combell stores and processes your personal data for as long as is necessary to achieve the objectives described in point 4.

The retention period can therefore differ for each purpose, for example to meet legal obligations (e.g. to meet our accounting and fiscal obligations, Combell is obliged to keep records for up to 7 years) or for the legal necessity to provide certain data as evidence in case of disputes for up to a maximum of 10 years after termination of your contract. These archived data are, of course, only accessible to a limited extent.

9. Cookies & the website

Apart from the information that you voluntarily share with Combell when using our websites, Combell also uses cookies and other technological means to collect data.

Websites

All information, whether in the form of text, files or images or any other form, is made available by Combell for information purposes only.

Any interested person may take note of this information, but Combell reserves the right, at the time it considers appropriate, to change the rules and conditions concerning access to the use of the website without prior warning, or to subject the entire website or parts thereof to a restriction.

The access to such private sections of the website can be made dependent on the provision of information by the visitor/user of the website. The visitor/user who provides this information explicitly agrees that this information becomes the property of Combell and that by the mere communication of information to Combell, the latter will be given express permission to use information in accordance with the Privacy Policy.

The provision of access to the private section of Combell's website through the use of usernames and passwords can be changed or refused by Combell at any time without this leading to any compensation.

Cookies

On our website, use is made of cookies or similar technologies where information on the device is stored and/or read (for ease of reading, all such techniques are called 'cookie' here). For more information about which cookies we use, why and how, and what your choices are, please click here for our cookie policy.

10. Contact details

Questions or requests regarding personal data or this Privacy Policy can be addressed at any time to:

Combell nv
Attn: Data Protection Team
Skaldenstraat 121, 9042 Ghent, Belgium
Tel.: +32 9 218 79 79
E-mail: data.protection@combellgroup.com

11. Changes

Combell reserves the right to amend this Privacy Policy. Changes will always be published on this website prior to their coming into force. We recommend that you regularly consult this Privacy Policy so that you are aware of these changes.