



Privacy Notice

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who uses our Services and/or using our website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR"). Please read this Privacy Notice carefully and ensure that you understand it.

This policy applies where we are acting as a data controller with respect to the personal data of our website's users in other words, where we determine the purposes and means of the processing of that personal data.

Our platform incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

Information about us

This website and underlying services is an initiative of Drawify.com, a limited liability company incorporated and existing under the laws of Belgium with registered address at Meeuwstraat 7, 2050 Antwerpen, and with company number 0757580985, referred to as 'we' or 'us'.

Questions regarding this Privacy Notice can be regarded to the following contact details:

Email address: hello@drawify.com

Telephone number: 00 32 478 88 28 55

Contact details Data Protection Officer / Representative:

1. What is personal Data?

Personal data is defined by the by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in section 0 of this Privacy Notice.

2. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in section 8.
- b) The right to access the personal data we hold about you. Section 7 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in section 8 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in section 8 to find out more.
- e) The right to restrict (*i.e.* prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate



grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims

- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in a structured, commonly used and machine readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in in section 8.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in section 8.

3. What personal data do we process?

In this section 00 we have set out:

- a) the general categories of personal data that we may process;
- b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- c) the purposes for which we may process personal data; and
- d) the legal bases of the processing.

Depending upon your use of our Services and/or website, we may collect some or all of the following personal data:

Usage data

We may process usage data. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

Account data

We may process your **account data**. The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely [the proper administration of our website and business.

Profile data

We may process your information included in your personal profile on our website, "**profile data**". The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.



Service data

We may process your personal data that are provided in the course of the use of our services, "**service data**". The service data may include requests for support, offers, communication. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you]. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

Publication data

We may process information that you post for publication on our website or through our services, "**publication data**". The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely [the proper administration of our website and business.

Enquiry data

We may process information contained in any enquiry you submit to us regarding goods and/or services, "**enquiry data**". The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent. In the event we would process your personal data for marketing purposes, we will always work to fully protect your rights and comply with our obligations under the GDPR the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Customer relationship data

We may process information relating to our customer relationships, including customer contact information "**customer relationship data**". The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.

Transaction data

We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website, "**transaction data**". The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

Notification data

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters, "**notification data**". The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Correspondence data

We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.



Other categories of data

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in section 8. If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so. In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the GDPR (or other applicable data protection laws) and your legal rights.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Do you share my personal data?

Use of processor(s)

We are free to rely on data processors. A processor is the natural or legal person who processes your personal data upon request and on behalf of us, the controller. The processor is required to ensure the security and confidentiality of the personal data. The processor will always act on our instructions. We rely on processors for hosting purposes, administrative purposes, marketing purposes, analytic purposes and communication.

With a view to the optimal protection of your personal data, we have made the necessary contractual arrangements with our processors to ensure that they apply the highest privacy standards. In any event, data processors shall be required to ensure the security and confidentiality of the personal data.

In addition to the above, we may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Transfer of personal data to third parties

Financial transactions relating to our website and services may be handled by our payment services providers, identify PSPs. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices.

We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

In addition to the specific disclosures of personal data set out in this section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.



6. How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept until you delete your account or as long as required by mandatory law.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. How can I access my personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in section 8 (*How do I exercise my rights?*).

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 15 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

8. How do I exercise my rights?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

1. for the attention of the DPO: Axelle Vanquaille
2. Email address: hello@drawify.com
3. Telephone number: 00 32 478 88 28 55
4. Postal Address: Meeuwstraat 7, 2050 Antwerp

9. Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

10. Personal data of children

Our website and services are targeted at persons over the age of 18. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

11. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

For more information on the cookies that we use, we refer to our cookie policy.

12. Changes to this Privacy Notice

We reserve the right to change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our website in a way that affects personal data protection and privacy.



Every substantial change will be immediately posted on our platform and you will be deemed to have accepted the terms of the Privacy Notice on your first use of our website following the alterations. We advise you to consult our website regularly to keep up-to-date.