# **General Privacy Policy**

Threedee World remains continuously committed to protecting the privacy of its users to the maximum extent possible and strives to provide a safe user experience for everyone. Our Privacy Policy provides everything you need to better understand how Threedee World collects and uses your information, and to understand the choices you have to protect your information.

The Privacy Policy contains our policies regarding the processing of personal data with the explanation of our privacy practices and information. Our privacy policy is designed to inform you about our privacy practices in a clear, concise manner.

If you have a question about privacy you should contact us by emailing us at contact@threedee.world.

### The general privacy policy of Threedee World

Capitalized words are defined in the General Terms and Conditions and have the same meaning in this Appendix as in the General Terms and Conditions.

Processing refers to any operation involving personal data that allows a natural person to be identified, directly or indirectly; such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, making available, alignment or combination, blocking, erasure or destruction of data.

This Privacy Policy aims to provide the persons involved in those processing operations with all the information required by the regulations in force, including the information required by the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or "GDPR").

Fairtual undertakes to process the Users' personal data in a legal, correct and transparent manner. In this Privacy Statement, Fairtual explains which personal data are processed and what are the purposes in doing so, what rights the User has to secure and possibly improve his/her privacy.

## <u>Terms</u>

This Privacy Policy uses the following terms:

The Website: the Website, which can be found at the URL https://threedee.world and all related websites.

**The Regulation**: the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (also referred to as "General Data Protection Regulation" or "GDPR")

**Personal data**: any information about an identified or identifiable natural person. For example: name, address, family composition, evaluations, testimonials, etc.

**Processing**: (the set of) processing(s) of personal data. For example: storage, collection, modification, retrieval, consultation, use, transmission, dissemination, transmission, erasure, destruction, etc.

**Controller:** the natural person, legal person, public authority, department or other body which alone or with others determines the purpose of and means for processing personal data.

Data subject: the identified or identifiable natural person to whom the processed data relates.

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## To whom does this privacy policy apply?

This policy applies to the processing of personal data of Website Users, specifically:

- persons who visit the Website;
- persons who fill out the contact form.

These individuals will collectively be referred to as the "Data Subjects" and each individually as a "Data Subject".

### The controller, data protection officer and processor

### The Controller:

Threedee World BV, whose registered office is located at 1831 Diegem (Belgium), Leonardo da Vincilaan 19A 8, registered with the Crossroads Bank for Enterprises under the number BE0726.840.893 (hereinafter referred to as "Threedee World") is responsible for the processing of personal data that it carries out in the context of its activities;

## The Data Protection Officer:

The data and privacy protection officer at Threedee World can be reached using the following contact information:

- naam: Mike Thevissen
- tel: + 32 (0)472 75 66 22
- E-Mail: dpo@threedee.world

### Purpose of processing

Threedee World processes personal data in connection with the use of its Website. Personal data is used for the following purposes:

- Contacts at Users who are enterprises or acting in a professional capacity (customers or prospects): the
  personal data are necessary to properly prepare and execute the contract concluded with Fairtual. For
  contract conclusion, Threedee World must have the necessary personal data in order to provide the agreed
  service;
- Suppliers with whom Threedee World is in contact: the personal data are necessary in order to properly prepare and execute the contract concluded with Fairtual;
- Any legitimate interest of the Controller;
- Being able to fulfill the request of the User who fills out the contact form (consent).

All personal data collected are processed administratively and possibly later for accounting purposes.

### What personal data is collected?

### Directly collected information

- Information regarding the Data Subject: Name First Name
- Information to contact the Data Subject: phone number e-mail address

If the Data Subject makes himself/herself known through the Website (by filling in the contact form), his/her data will be stored in the database. By registering and/or identifying, the Data Subject gives express consent to be included in the database.

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## What the Data Subject communicates

If the Data Subject contacts Threedee World by telephone, Threedee World may note his/her identity (surname and first name) and telephone number in order to build a contact record and see who uses the service.

## Categories of personal data processed

- Identity Information
- Contact information
- All the data, documents and media that the data subject has made available to Threedee World

### Who receives the personal data?

The Controller may transfer the Data Subject's personal data to the following recipients:

- ICT service providers;
- Accountant bookkeeper;
- Subcontractors affiliated with the Controller, such as a designer or programmer.

In principle, the personal data of the Data Subject will not be transferred to a country that is not part of the European Economic Area.

Threedee World processes these personal data in accordance with the purposes specified in the article "Data Processing". Only employees within the Threedee World organization, who in the performance of their duties need this personal data, will be able to consult it.

### How long will personal data be kept?

The Controller retains the Personal Data of the Data Subject:

- As long as necessary to achieve the purposes defined in Article Data Processing;
- As long as necessary to delete the personal data after the retention periods provided for in the regulations have expired;
- As long as necessary to comply with obligations arising from a legal text, other regulations or agreements concluded by Threedee World, or imposed by a public authority.

### What rights can the data subject exercise?

# Right to object

Where personal data are processed on the basis of consent of the Data Subject (see section 'To whom does this policy apply?'), the Data Subject may withdraw this consent at any time.

If the Data Subject wishes to exercise one or more of the rights listed below, he/she should contact the Data Protection Officer of Threedee World using the contact details listed in article 'The Controller and the Data Protection Officer'.

**Right to view** 



The Data Subject has the right to obtain a determination from Threedee World as to whether or not personal data concerning him/her are being processed and, if necessary, to access the personal data in question and the following information:

- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom personal data are disclosed;
- if possible, the period during which the personal data are expected to be
- be stored, or if not possible, the criteria for determining that period;
- that the Data Subject has the right to request Threedee World that personal data be
- erased or corrected, or that the processing be restricted;
- that the Data Subject has the right to complain to the Data Protection Authority;
- all available information about the source of the data, in the event that the
- personal data are not collected from the Data Subject itself;
- the existence, where appropriate, of exclusively automated decision-making, including profiling and, in applicable cases, useful information on the underlying logic, importance and expected consequences of the automated decision-making.

Threedee World will, upon express request of the Data Subject, provide, within a reasonable period of time, the most complete overview of the personal data and/or information requested above. The Data Subject has the right to obtain a copy of the requested information free of charge.

If the Data Subject submits its request electronically, Threedee World may provide the information by electronic means, such as e-mail.

Threedee World guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can change, modify, correct or delete such data himself/herself at any time.

## **Right of correction**

The Data Subject has the right to have erroneous, inappropriate or outdated personal data deleted or corrected. If the Data Subject believes that information stored by Threedee World is incomplete, inaccurate, inappropriate or outdated, he/she should contact Threedee World's Data Protection Officer using the contact details listed in Article 4.

Threedee World guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can change, modify, correct or delete this data himself/herself at any time.

### **Right to delete data**

The Data Subject has the right to obtain the erasure of certain personal data when one of the following applies:

- the personal data are no longer necessary for the purposes under which they were collected or processed;
- the Data Subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;
- the Data Subject objects to processing pursuant to this policy;
- the personal data have been processed unlawfully;
- the personal data must be deleted in order to comply with a legal obligation incumbent on Threedee World.

Threedee World is obliged to delete personal data without unreasonable delay when one of the above cases applies. Threedee World guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can change, modify, correct or delete such data himself/herself at any time.

### **Right to restriction of processing**

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The Data Subject has the right to obtain, in certain cases, the restriction of the processing of his personal data. The following conditions must apply:

- if the personal data stored are inaccurate, for the period Fairtual needs to verify the accuracy of the personal data and, if necessary, to correct it;
- the processing of personal data is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of its use;
- Threedee World no longer needs the data for the processing purposes for which the data were stored but in the context of legal proceedings, for the protection of natural or legal persons or for important reasons of public interest.

Where the processing of personal data has been restricted, Threedee World may continue to store the personal data but no personal data may be processed without the prior consent of the Data Subject.

Threedee World guarantees that the Data Subject, through his/her account as a registered User, has full access to his/her data and can modify, adapt, correct or delete such data himself/herself at any time.

## Right to transferability of personal data

Subject to the rights and freedoms of third parties and the limitations provided for in the Regulation, the Data Subject has the right to obtain the personal data concerning him that he himself has provided to Threedee World in a structured, common and machine-readable form.

The Data Subject has the right to transfer this data itself to another Controller or to request that the personal data be transferred directly from Threedee World to another Controller.

#### Refusal of automated processing and decision-making

The data processing operations and processes are neither automated nor without human intervention. Nevertheless, the Data Subject may object to the automated processing of his/her personal data if such processing significantly affects him/her.

The following exception applies here, which must be assessed on a case-by-case basis:

• the automated processing is authorized by a legal provision applicable to Threedee World, which also provides for the necessary measures to protect the rights, freedoms and interests of the Data Subject.

The Data Subject also has the right to object to the processing of personal data applicable to him in the cases provided by law or other regulatory texts.

The Data Subject may exercise these rights by submitting a request to or contacting the Data Protection Officer at Threedee World, as previously mentioned.

The Data Protection Officer will take the necessary measures to verify the identity of the Data Subject making a request.

The Data Subject also has the right to lodge a complaint with the supervisory authority. In Belgium, since May 25, 2018, this is the Data Protection Authority (formerly the Commission for the Protection of Privacy): see <a href="https://www.gegevensbeschermingsautoriteit.be">https://www.gegevensbeschermingsautoriteit.be</a>.

#### What security measures are taken?

As personal data is processed, Threedee World guarantees the confidentiality, integrity and availability of this information at all times. Threedee World maintains a high level of security for the processing and the data being processed and stored.

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1. Definition of information security roles and responsibilities to ensure that all security activities are carried out.

2. All required documentation, such as policies, standards, procedures and guidelines, is in place to support security. That documentation is reviewed regularly.

3. Threedee World uses a risk-based approach to identify necessary technical and other security controls. This ensures that appropriate priorities are set and that only efficient and effective security controls are selected and implemented.

4. Threedee World is committed to ensuring that employees throughout the organization are aware of the importance of information security and data protection and integrates this through regular training and exercises.

5. Threedee World has identity and access controls in place to protect information from unauthorized access, modification or deletion, whether intentionally caused or not.

6. Threedee World has implemented physical controls to ensure fire and theft prevention and access control for its premises.

7. Cyber protection controls were installed. Applications and technology platforms were designed, configured, maintained and evaluated based on recognized security criteria, such as vulnerabilities and threats are continuously monitored.

8. A Business Continuity program was installed to ensure continuity in case of outages or disasters and restore business processes. During the activation of this program, information security principles remain in effect.

9. Information security policies and their implementation are regularly reviewed.



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