



## Privacy Notice

### 1. General information

This Privacy Notice explains how Sitback SRL ("we", "us", "our"), as processor of the establishment in which you are currently located (hereinafter "the establishment"), Sitback SRL ("we", "our", "us"), having its registered office in Brussels (telephone: +32 477 19 98 76), registered at the C.B.E. under the number 0747.903.949, processes personal data relating to you that we collect via the Sitback platform (hereinafter "the platform") when you place an order in the establishment.

### 2. The data we collect

When you use our platform, we process the following personal data, which is provided to us directly by you:

- a. Identification data: telephone number or e-mail address;
- b. Data relating to payments made on the platform: transaction number assigned by the partner electronic payment platform, IBAN account number, last four credit card numbers.

### 3. Purposes for which we process your data

We process your personal data for the following purposes:

- a. When it is necessary for **the performance of the contract** that you conclude with the establishment to enable you to place an order using the platform;
- b. When it is necessary to comply with a **legal obligation** to which we are subject.

### 4. Sharing and Transferring your data

Your personal data is not shared with any third party and is not transferred outside the European Economic Area (EEA).

### 5. Security and Data Retention

Your personal data is confidential and will be treated as such.

We take all reasonable steps to protect your data. These include putting in place procedures to limit unauthorized access to and disclosure of your data.

We will retain your data for as long as is necessary to fulfill the purposes described above, in line with the following maximum retention periods:

- a. Your telephone number or e-mail address will be retained for 14 days;
- b. The transaction number assigned by the partner electronic payment platform will be kept for 6 months.

Please note that no other data will be retained after your use of the platform.

## 6. Data on minors under 13 years of age

You must be over 13 years old to use the platform. By using the platform, you acknowledge that you are over 13 years old.

## 7. Automated Decision-making and Profiling

No automated decisions or profiling of you will be made during the processing of your data as described in this Privacy Notice.

## 8. Your Rights

At any time, you have the right to contact us by mail ([privacy@sitback.be](mailto:privacy@sitback.be)), in particular if you have any questions about the processing of your personal data or if you wish to exercise one of the following rights:

- a. **Right to access, rectify or erase** your personal data;
- b. **Right to restrict or object** to the processing of your personal data;
- c. **Right to withdraw your consent** to the processing of your personal data based on your consent (which is not the case here);
- d. **Right to data portability** (right to receive your data or to have them transferred to another data controller).

We will endeavor to respond to your requests as far and as soon as possible.

Please note, however, that since we only retain the transaction number assigned by the partner electronic payment platform beyond 14 days, we will have to ask you for additional information (amount of the concerned payment, time of payment, name and address of the establishment...) so that we can process your request.

For any question relating to the use of your personal data that is not directly related to the use of the platform, please contact the establishment directly (in its capacity as data controller).

If you consider that our answers are not satisfactory, you have the right to lodge a complaint with the competent supervisory authority (in Belgium, this is the Data Protection Authority, <https://www.autoriteprotectiondonnees.be>).

Finally, we would like to inform you that, in view of the very limited processing of personal data that we carry out, we did not consider it necessary to appoint a data protection officer as there will be no regular and systematic monitoring of data subjects on a large scale. Nevertheless, we are in contact with a data

protection specialist and will call on him if necessary.

#### **9. Changes to this Privacy Notice**

We reserve the right to modify this Privacy Notice at any time, particularly in the event of regulatory changes.

The current version of this Privacy Notice will always be available on the platform.