

PRIVACY POLICY

Version 1.0
Date: 16/09/2026

Identity and contact details of the controller

This Privacy Policy applies to all personal data processed by Trace Your Craft BV, with registered office at Plasstraat 30, 8790 Waregem, Belgium, with company number VAT BE 1042.041.009, which is the controller of this website.

The Controller attaches great importance to your privacy and therefore processes your personal data in accordance with European Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter the “GDPR”), as well as any future or supplementary legislation implementing it, insofar as applicable.

For any further questions or comments regarding the way in which we handle your personal data, you can always contact us, either by email at privacy@traceyourcraft.com or by post at the postal address stated above. privacy@traceyourcraft.com

What does “processing personal data” mean?

The processing of personal data (hereinafter “data”) includes any operation performed on data that can identify you as a natural person. This Privacy Policy explains which data this concerns. The concept of “processing” is very broad and includes, among other things, collecting, storing and using your data, or sharing it with third parties.

What data do we process?

Below, we explain which data relating to you we may process. Depending on the specific situation, your preferences and the way in which you contact us, we do not process all of the data listed below in every case.

For personal data that we process on the Platform solely on behalf of our customers, Trace Your Craft BV acts as a processor and the separate Data Processing Agreement (DPA) applies.

For our own purposes, such as account management, invoicing and security, we act as controller. Our role is determined by the actual purposes and means of the processing. Where we select, combine or anonymise personal data for our own analysis or commercial purposes, we also assume the obligations of a controller in respect of such processing. This requires a valid legal basis in advance, the necessary information to data subjects and appropriate safeguards; acceptance of the General Terms and Conditions or the DPA does not replace the consent of data subjects.

Under the General Terms and Conditions, only genuinely anonymised and sufficiently aggregated results may be analysed and sold. Identification must reasonably be

excluded, including by Trace Your Craft BV itself. Raw personal data, pseudonymised data and confidential business data are not sold on this basis. The conditions governing benefits for contributing customers will be defined in advance in the applicable Return on Sharing programme.

Before any new processing of personal data for these own purposes, we will provide the required specific information, including the legal basis, categories of data, recipients and retention periods.

Customer data

In the context of our core activities, including the use of the Trace Your Craft Platform, we process the following personal data relating to our customers:

- General identification data (surname, first name, title, login details, etc.);
- General contact details (email address, address, telephone number, etc.);
- Data relating to your role within the Platform;
- Contractual data (e.g. address, VAT number, agreement, quotations, etc.);
- Payment and invoicing data (bank account number, billing address, etc.);
- After-sales service;
- Testimonials, surveys and promotional content such as photos and videos on social media (e.g. reviews and experiences relating to the services we offer, social media posts via our accounts including, without limitation: LinkedIn, YouTube, X, Instagram and Facebook).

Suppliers – service providers

In the context of our cooperation with suppliers and service providers, we process the following personal data relating to them:

- General identification data (surname, first name, title, etc.);
- General contact details (email address, address, telephone number, etc.);
- Business-related data insofar as such data makes it possible to identify a natural person;
- Contractual data (e.g. address, VAT number, agreement, quotations, etc.);
- Payment and invoicing data (e.g. invoices, etc.);
- Feedback, testimonials, quotes and promotional content (e.g. reviews and experiences relating to our work or cooperation, testimonials, quotations, attendance at events, etc.).

Job applicants

We may additionally process the data listed below in relation to job applicants. Naturally, this will largely depend on the information you choose to provide to us in connection with your application.

- General identification data (surname, first name, title, etc.);
- General contact details (surname, first name, email address, address, telephone number, etc.);

- CV, letter of recommendation;
- Personal details;
- Employment-related data;
- Personality-related data, tests, interviews;
- Photographs or video footage provided by the job applicant.

Website visitors

When you visit our website www.traceyourcraft.com, we may process the following data, depending on the functions used and your cookie choices:

- IP address, browser type, location data, how the individual reached the website, interests and the way in which the individual navigates the website (through strictly necessary, analytics and marketing cookies);
- Surname, first name, email address and contact message (via the online contact form);

Marketing activities

Data we process in the context of marketing activities:

- Sending a newsletter by email;
- Trade fairs (e.g. business cards);
- Professional data (publicly available company contact details);

For what purposes do we process your data?

Personal data is processed exclusively within the context of the company and, in particular, for the following purposes:

- In connection with the sale of our services;
- Managing the Trace Your Craft online Platform;
- For marketing purposes, such as retargeting (we obtain data exclusively via the website);
- Participating in trade fairs;
- Complying with administrative, legal and tax obligations;
- Communicating with customers and prospects;
- Recruitment of employees.

On what legal bases do we process your data?

We process your data for the purposes described below and do not collect or process more data, or different types of data, than are necessary for those purposes.

We process your data only insofar as the processing is based on one of the legal bases set out in the GDPR, as described below.

Legal obligation

We process certain data in order to comply with legal or regulatory obligations incumbent upon us. This includes, for example, tax and accounting obligations or obligations relating to data protection.

Necessary for the performance of the contract

We process certain data because this is necessary to enter into, perform or terminate an agreement with you as a data subject. This includes, for example, contacting you, scheduling appointments, responding to a request or obtaining information in connection with entering into a contractual relationship, as well as the actual performance of the contractual assignment within the context of our core activity, in order to provide our services to you or receive services from you.

Legitimate interest

We process certain data on the basis of our legitimate interests where, in specific cases, those interests outweigh any possible adverse impact on your rights. Examples include sending newsletters to our existing customers; improving the quality of our services; training employees and evaluating and maintaining data and statistics relating to our activities in the broad sense; retaining and using evidence in connection with liability, proceedings or disputes and for the purpose of archiving our activities; and ensuring security, both online on this website and at our business premises.

Consent

We process certain data on the basis of your consent. Examples include sending our newsletter to non-customers; the use of certain analytics or marketing cookies; and publishing photographs containing personal data on our website and social media channels. Data relating to applicants will only be retained after the recruitment process with their consent.

Source of the data

Most of the data we process about you has been obtained directly from you. In the context of our services, we may also obtain data about you through external service providers or public sources.

With whom do we share your data?

We do not disclose your data to third parties unless this is strictly necessary in light of the purposes set out above or we are legally required to do so.

Where necessary, we use external service providers (processors) to support our operational purposes, such as managing our websites and IT systems. Where applicable, these external service providers carry out certain processing activities on our behalf. We will only share your data with these external service providers to the extent necessary for the relevant purpose. They may not use the data for other purposes. In addition, these service providers are contractually bound to ensure the confidentiality of your data through a Data Processing Agreement entered into with them.

In practical terms, this means that, insofar as relevant to your situation, we share your data with the following third parties for the following purposes, with these third parties acting in certain cases as processors on our behalf:

- Postal operators, transport and delivery companies where we need to send you something by post;
- Payment service providers where we receive payments from you, or vice versa;
- External representatives and consultants or any other parties involved in connection with our core or ancillary activities;
- Processors that assist us with IT in operating our organisation, with a view to secure and efficient digital data management within our organisation;
- Public authorities, judicial bodies and members of regulated professions such as accountants and lawyers, for the purpose of complying with our legal obligations and defending our interests, where required.

How long do we retain your data?

We do not retain your data for longer than necessary for the purpose for which the data was collected or is processed. As the period for which data may be retained depends on the purposes for which it was collected, the retention period may vary in each situation. In some cases, specific legislation will require us to retain data for a certain period. Our retention periods are always based on legal requirements and a balancing of your rights and expectations against what is useful and necessary to fulfil the relevant purposes. At the end of the retention period, your data will be deleted or anonymised.

Where do we store your data and how is it protected?

We implement appropriate technical and organisational security measures in the context of our activities to prevent the destruction, loss, falsification or alteration of data, unauthorised access to data or unlawful disclosure to third parties, as well as any other unauthorised processing of such data.

We also ensure that the processors we engage implement appropriate security measures to minimise the risk of incidents as far as possible.

If, through the use of specific services or software tools, your data is processed outside the European Economic Area (EEA), this will only take place in or to countries for which the European Commission has confirmed an adequate level of protection for your data, or measures will be taken to ensure the lawful processing of your data in those third countries.

What are your rights?

You have various rights in relation to the data we process about you. If you wish to exercise any of the rights set out below, please contact us using the contact details provided under the first heading of this Privacy Policy.

Right of access and copy

You have the right to access your data and obtain a copy of it. This right also includes the possibility of requesting further information about the processing of your data, including the categories of data processed about you and the purposes for which it is processed.

Right to correction or rectification

You have the right to have your data corrected if you believe that the data we hold about you is inaccurate.

Right to erasure (right to be forgotten)

You have the right to request that we erase your data without undue delay. However, we will not always be able to comply with such a request, including where we still need the data in connection with an ongoing agreement or where we are legally required to retain certain data for a specified period.

Right to restriction of processing

You have the right to restrict the processing of your data. This means that processing is temporarily suspended until, for example, the accuracy of the data has been established.

Right to withdraw your consent

Where processing is based on your consent, you have the right to withdraw that consent at any time by contacting us. For marketing communications that you receive from us by email on the basis of your consent, you can easily withdraw your consent by clicking the unsubscribe link at the bottom of such a message.

Right to object

You have the right to object to the processing of your data where that processing is based on legitimate interests. Such an objection must be based on specific reasons relating to your particular situation. You may also object to the use of your data for direct marketing purposes. Email marketing communications will always include an opt-out option.

Right to data portability

You have the right to obtain, in electronic form, the data that you have provided to us on the basis of your consent or in the performance of an agreement. This enables the data to be easily transferred to another organisation. You also have the right to ask us to transfer your data directly to another organisation, where technically feasible.

Right to lodge a complaint with your supervisory authority

If you believe that we process your data incorrectly, you always have the right to lodge a complaint with your supervisory authority for data protection.

Belgian Data Protection Authority (DPA)

Rue de la Presse 35

1000 Brussels

contact@apd-gba.becontact@apd-gba.be

How can you exercise your rights?

You can exercise your rights via privacy@traceyourcraft.com. Only where we have reasonable doubts about your identity will we request additional information that is necessary and proportionate to confirm your identity. A full copy of your identity card is not required as standard.

We will respond without undue delay and no later than one month after receipt. In the case of complex or numerous requests, this period may be extended by up to two months; we will inform you of the extension and the reasons for it within the first month.

Changes

We reserve the right to amend this Privacy Policy. The most recent version is available on our websites at all times. The date on which this Privacy Policy was last amended can be found at the top of this document. In the event of a substantial change to the Privacy Policy, we will, where possible, inform directly the data subjects who may be affected by it.