

Greentripper - Privacy Policy

Effective date: 1 December 2025

SCOPE OF THIS PRIVACY POLICY

Please read our privacy policy (hereinafter the “Policy”) carefully to understand how we will process your personal data in the course of our business.

This Policy explains how your personal data is collected, used and (where applicable) disclosed to third parties by Greentripper. More specifically, you will also learn how you can access and update your personal data, as well as how you can control your data and make certain choices regarding how your personal data is used.

I. CATEGORIES OF PERSONAL DATA, LEGAL BASIS, PURPOSE AND RETENTION

The table below describes the different types of personal data we collect, the legal basis for processing, the purpose pursued, and the applicable retention period.

Please note that not all of the processing described below necessarily applies to every individual.

Types of personal data	Legal basis for processing	Purpose of processing	Data retention
Personal information (surname, first name, postal address, email, telephone number, language)	Performance of the contract, Consent,	Provision of services, Communication with customers, Customer service, Issuing warranty certificates	Up to 10 years after the end of the contract and up to 20 years in aggregated form for analytical and statistical purposes
Professional information (VAT number, contact person, job title and employer details, postal address, email address, language)	Performance of the contract, Legal obligations, Greentripper’s legitimate interest	Compliant invoicing Provision of services Communication with customers Customer service Analyses and statistics Improvement of Greentripper’s services	idem
IP address and other connection or usage identifiers	Greentripper’s legitimate interest, Legal obligations	System security, Fraud prevention, Technical analysis, Analyses and statistics	idem
Travel information (brochures (for Act4Travel Scanner), modes of transport,	Contract performance, Consent, Greentripper’s legitimate interest	Calculation of the carbon footprint according to the selected scope,	

itineraries, distances, journey times, classes, vehicle types, fuels, fuel consumption, accommodation, food, local activities, waste, various events)		Provision of the contribution service, Generation of certificates Analyses and statistics	
Domestic energy information (gas, electricity, heating oil)	Consent, Greentripper's legitimate interest	Calculation of overall carbon footprint (if requested) Analyses and statistics Improvement of Greentripper's services	idem
Transaction details (project selection, carbon footprint, contribution amount, percentage)	Contract performance, legal obligations (accounting) Greentripper's legitimate interest	Processing of contributions, Generation of certificates, Accounting and invoicing Analyses and statistics Improvement of Greentripper's services	idem
Browsing data (-cookies, logs, website behaviour)	Consent, Greentripper's legitimate interest	Improvement of user experience, Analytics and statistics, Site security Improvement of Greentripper's services	same
Account credentials (email, encrypted password, security questions)	Performance of the contract, Legitimate interests	User account management, Security and authentication	idem

Analyses and statistics: this processing involves analysing aggregated data, to the greatest extent possible, relating to the use of our services, the carbon footprint of trips on based on their characteristics, and the selected carbon offset projects, for the purpose of improving our services or providing value-added information to our customers. This processing excludes any use of your personal identifiers, and we endeavour to delete, erase or anonymise data that could identify you directly or indirectly. We never share your personal data processed in this context with third parties, but only the results of these analyses and statistics.

Improvement of Greentripper's services: this processing involves continuously improving the user experience in the broadest sense, expanding the range of services offered to our customers, refining or modifying the services provided, identifying trends or preferences among our customers or users to develop new features, etc.

Data quality, limitation and retention: we ensure that we collect only data that is adequate, relevant and necessary for these various purposes, and that it is as accurate as possible. We retain this data in a form that allows the identification of data subjects only for as long as is necessary for

the purposes for which it was collected. Certain purposes do not require the identification of data subjects, and we make every effort to ensure that processing for these purposes is carried out only using pseudonymised data or data where the identification of data subjects is reasonably limited or mitigated. Such processing may justify a longer retention period, but only for these specific purposes and subject to enhanced protection of the elements enabling the identification of the data subjects.

II. SOURCES OF PERSONAL DATA

This Policy applies to personal data that we collect from or about you from the following sources:

- **Our own websites:** Consumer- and business-oriented websites managed by Greentripper: www.greentripper.org and www.act4travel.greentripper.org.
- **API integrations:** Data collected via our API integrations with third-party partners (travel agencies, tour operators, etc.).
- **Email, SMS and other electronic messages:** Electronic communications between you and Greentripper.org.
- **Customer service:** communications via our online forms.
- **Online and offline registration forms:** Registration forms that we collect electronically or by post, at events, etc.

III. SHARING OF YOUR PERSONAL DATA

We share your personal data with the following types of third-party organisations:

- **Service providers:** These are external companies we use to help us run our business (accounting, CRM tools, data hosting, etc.). Service providers and their staff are only authorised to access and use your personal data on our behalf and for the purpose of carrying out the specific tasks we entrust to them, in accordance with our instructions. They are required to ensure the confidentiality and security of your personal data.
- **API partners:** For customers using our services via an API integration (travel agencies, tour operators, etc.), we share the data necessary for the service to function, but those API partners and Greentripper each process the data separately, each under their own respective responsibility. In some cases, these clients may have access to some of your personal data, just as Greentripper may have access to certain personal data of our API partners' client users.
- **End customers:** For business customers who wish us to send guarantee certificates directly to their end customers, we use the contact details provided solely for this purpose.

- **Third-party companies using your personal data** for their own marketing purposes: We do not licence or sell your personal data to third-party companies for their own marketing purposes. We will transparently inform you of the identity of any third party to whom we may, with your prior consent, disclose your data for marketing purposes, and we will respect your decision in this regard.
- **Third-party purchasers using personal data for legal reasons or as a result of a merger/acquisition:** We may disclose your personal data to third parties for legal reasons or in the context of an acquisition or merger.

IV. STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA

We use various measures (described below) to ensure the confidentiality and security of your personal data:

- **Persons with access to your personal data:** Your personal data will be processed by our staff or agents who are duly authorised to do so, provided they have a *'need to know'*, in accordance with the specific purposes for which your personal data was collected (e.g. our staff responsible for customer service matters will have access to your customer file).
- **Measures taken in operating environments:** We store your personal data in operating environments that apply adequate security measures to prevent unauthorised access. We apply reasonable standards to protect your personal data. Unfortunately, the transmission of information over the internet is not completely secure and, although we do everything in our power to protect your personal data, we cannot guarantee the security of data during transmission via our websites/apps.
- **Measures we expect you to take:** It is important that you also play a part in protecting and securing your personal data. When you create an online account, be sure to choose a password that others cannot easily guess and never share your password with anyone. You are responsible for the confidentiality of this password and for any use made of your account. If you are using a shared or public computer, never select the 'remember my username/email address or password' option and ensure you log out of your account every time you leave the computer.
- **Transfer of your personal data:** The storage and processing of your personal data, as described above, are carried out using infrastructure located within the European Union and the European Economic Area ('EEA'). In the event that your personal data is nevertheless transferred to countries outside the European Economic Area ('EEA'), including to countries with data protection standards different from those in force within the EEA, we will ensure that this is done in compliance with the applicable rules, either to countries offering an adequate level of protection, or by means of appropriate safeguards that are adequate and in accordance with applicable legislation.

Please note, however, that these safeguards do not apply to information you share in the public domain, such as on third-party social media platforms.

V. ACCESS TO YOUR PERSONAL DATA AND YOUR OTHER RIGHTS

Access to your personal data: You have the right to obtain confirmation as to whether or not data concerning you is being processed and, if so, to access that data and to request a physical or electronic copy of the information held about you. You also have the right to request information about the source of your personal data.

These rights may be exercised by sending us an email to info@greentripper.org or by writing to us at Rue d'Accolay, 15, 1000 Brussels, enclosing a copy of your identity document or equivalent information (if we request it and where permitted by law). If the requested information is provided by someone other than yourself, without proof that the request is being made legitimately on your behalf, the request will be rejected.

Please note that any identifying information provided to us will only be processed in accordance with applicable laws and to the extent permitted by those laws.

Additional rights (e.g. modification, deletion of personal data): You have the right to:

- request the deletion, portability, correction or review of your personal data;
- object to the processing of your data (for example, for direct marketing purposes);
- restrict the use and disclosure of your personal data;
- withdraw consent to all our data processing activities that rely on this legal basis.

Please note that, in certain circumstances, we will not be able to delete your personal data without also deleting your user account. We may be required to retain some of your personal data after you have requested its deletion in order to fulfil our legal or contractual obligations. We may also be permitted by applicable laws to retain some of your personal data to meet our business needs.

Without in any way limiting your rights under applicable law, we also offer you the option to review and amend your personal data yourself, via the account management tool on our website.

Right to complain: We hope that we will be able to address any queries you may have regarding how we process your personal data. However, if you have any unresolved issues, you have the right to lodge a complaint with the Data Protection Authority (DPA) <https://www.autoriteprotectiondonnees.be> - contact@apd-gba.be .

VI. COOKIES/SIMILAR TECHNOLOGIES, LOG FILES AND WEB BEACONS

Cookies and similar technologies: We use cookies and similar technologies to enhance your experience on our websites, analyse the use of our services (e.g. via Google Analytics) and personalise content. You can manage your cookie preferences via using the CookieYes tool.

Log files: We collect information in the form of log files that record your activities on the websites and compile statistics on your browsing habits. These entries are generated automatically and help us to resolve errors, improve performance and ensure the security of our websites.

Web beacons: Web beacons (also known as 'web bugs') are small pieces of code that provide a graphic image on a web page or in an email for the purpose of transmitting data back to us. The information collected via web beacons includes, for example, your IP address and data on how

you responded to an email campaign (e.g. at what time the email was opened, which links in the email you clicked on, etc.). We will use web beacons on our websites or include them in emails we send to you. We use information from web beacons for various purposes, including website traffic reporting, counting unique visitors, advertising, auditing, email reporting and personalisation.

VII. YOUR CHOICES REGARDING HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

We strive to offer you choices based on the personal data you have provided to us. The mechanisms below give you the following control over your personal data:

- **Cookies/similar technologies:** You can manage your consent via (i) our consent management solution the Cookieeyes tool or (ii) your browser to refuse some or all cookies/similar technologies, or to request to be notified when they are used.
- **Advertising, marketing and promotions:** If you wish for your personal data to be used by Greentripper to promote its services, you can indicate this by ticking the relevant box(es) on the registration form. If you decide that you no longer wish to receive such communications, you can then unsubscribe so that you no longer receive marketing communications at any time. To do so, simply follow the instructions provided at the bottom of each communication or contact us at info@greentripper.org . Please note that even if you opt out of marketing communications, you will still receive administrative communications from us, such as transaction confirmations, notifications regarding your account activity (e.g. account confirmations, password changes, etc.) and other important non-marketing announcements.

VIII. CHANGES TO THE POLICY

If we change the way we process your personal data, we will update this Policy. We reserve the right to make changes to our practices and this Policy at any time. Please check regularly for updates or changes to our Policy. The effective date at the top of this document indicates the last revision of this Policy.

In the event of significant changes, we will notify you by email or via a notice on our website.

IX. CONTACT DETAILS OF THE DATA CONTROLLER

If you have any questions or comments regarding this Policy and our privacy practices, or if you wish to lodge a complaint regarding our compliance with applicable privacy laws, please contact us:

- **By email:** info@greentripper.org
- **By post:** Rue d'Accolay, 15, 1000 Brussels
- **By telephone:** /

We will accept and investigate any complaint regarding the way we handle personal data (including a complaint alleging that we have not respected your rights under applicable privacy laws).

Data controller:

Greentripper
Cantersteen 47
1000 Brussels
BE0715.958.681