

The limited company DIGIT 89, with its registered office located at Square des Martyrs 1, 6000 Charleroi, and registered with the Belgian Crossroads Bank for Enterprises under number 0775.289.227, places great importance on the protection of personal data of users of its Internet platform, which offers an innovative financing solution to eligible debtors and creditors, as well as, more generally, its partners and contacts.

In accordance with the European General Data Protection Regulation (GDPR) No. 2016/679, DIGIT 89 acts as an independent data controller for the personal data it collects and processes in the course of its activities.

1. What data are we talking about?

The personal data collected and processed by DIGIT 89 may vary depending on the case, such as, but not limited to, name, first name, profession/position, contact information (electronic), images, cookies, data relating to the connection and consultation of the Internet platform (such as access codes), including, where applicable, those concerning the management of any disputes.

Most of the time, this data comes directly from the individuals concerned, either via the corresponding forms for prior and mandatory registration as an eligible supplier or debtor, or through other (electronic) means of communication. Some data about suppliers is provided in advance by debtors to allow DIGIT 89 to offer them its financing solution.

2. For what purposes?

The processing of this data is necessary to allow DIGIT 89, depending on the case:

- (i) to respond to contact and/or registration requests it receives,
- (ii) to send the newsletter and/or any other information related to DIGIT 89's activities,
- (iii) to promote the activities of DIGIT 89 and/or its partners,
- (iv) to conduct statistical analyses,
- (v) to execute the contract to which the concerned debtor or supplier is a party and/or the pre-contractual measures taken at their request, and particularly to ensure the management of financing solutions implemented through the Internet platform, invoicing, and possible recovery. It also helps meet the legitimate needs of its financial partner, particularly in the fight against money laundering. In this case, the corresponding data will be kept for the duration of the contract as well as the applicable statutory limitation periods (especially regarding anti-money laundering).

If this personal data is not available, DIGIT 89 will not be able to achieve all or part of the aforementioned purposes. Additionally, with the exception of the specific retention periods mentioned above, this data will be kept as long as the individuals concerned do not object.

The processing of this data is therefore based, depending on the case, on the execution of the corresponding contract, compliance with applicable legal obligations, the consent of the individual concerned, and/or the legitimate interests of DIGIT 89 and/or a third party, which DIGIT 89 believes also benefit the individuals concerned.

For debtors and eligible suppliers using the financing platform, the treatments and corresponding data, as well as the legal bases, are as follows:

- (a) **Platform registration:** DIGIT 89 collects the name, first name, username, contact details (electronic), address, nationality, date, and place of birth of the corresponding users, as well as a copy of the necessary identity documents required by law for anti-money laundering purposes, such as a copy of the identity documents of beneficial owners and their agents. This data is necessary for the registration and identification of the concerned debtors and suppliers and is clearly identified on the corresponding registration page. This data processing is based on Article 6.1(b) (execution of the contract) and Article 6.1(c) (compliance with legal obligations related to anti-money laundering) of the GDPR.
- (b) **Invoice management:** DIGIT 89 collects and communicates to the relevant partners the personal data necessary for the issuance and collection of corresponding invoices. This data processing is based on Article 6.1(b) (execution of the contract) and Article 6.1(c) (compliance with legal obligations related to anti-money laundering) of the GDPR.
- (c) **Statistics and marketing:** The data relating to the use of the Internet platform is processed for statistical purposes to enable DIGIT 89 to study and understand how the platform and financing solution are used by its users. This data processing is based on Article 6.1(f) (legitimate interests) of the GDPR.

3. What rights do individuals have?

Each individual has the legal right to free access and correction of their data. It is also possible to request the deletion of inaccurate, incomplete, or irrelevant data, or to request the restriction of processing if legal conditions allow it. Likewise, individuals can object to the processing of their personal data for direct marketing purposes. Finally, in some cases, it is possible to receive the personal data provided to DIGIT 89 in a structured, commonly used, and machine-readable format, and to transfer this data to another data controller.

To exercise any of these rights, a written, signed, and dated request must be sent, along with proof of identity if necessary, by regular mail to DIGIT 89 or by email to compliance@digit89.com.

Finally, each individual has the right, if necessary, to lodge a complaint with the Belgian Data Protection Authority, Rue de la Presse 35, 1000 Brussels, www.autoriteprotectiondonnees.be.

4. To whom can this data be transmitted?

The personal data may, depending on the case, be communicated to:

- (i) the individuals concerned themselves,
- (ii) DIGIT 89's partners and members, for instance, to ensure the follow-up of the financing solution between concerned debtors and suppliers, including with the third-party financier and their credit insurer, who may have access (directly for debtors or indirectly in the context of an audit for suppliers), but always strictly as necessary and subject to appropriate confidentiality commitments,
- (iii) relevant partners in the event of a merger, sale, acquisition, or similar event,
- (iv) public, tax, and social authorities, to the extent necessary to comply with DIGIT 89's legal, tax, and social obligations,
- (v) subcontractors and other professional contacts of DIGIT 89, such as an IT service provider, to the extent necessary to carry out their respective tasks.

Privacy Policy

5. Where and how is this data stored?

Generally, the data is not transferred outside the European Union. If this were to happen, DIGIT 89 would implement appropriate safeguards, which individuals can inquire about to learn more.

In any case, DIGIT 89 strives to take appropriate technical and organizational measures to protect this data.

This means that our IT system is equipped with backup, filtering, and firewall systems in line with relevant industry security standards, and our employees are aware of the risks associated with data breaches and trained to handle personal data properly. Access to personal data is granted only to authorized individuals as part of their job responsibilities.

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