

# Privacy policy

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Doccle attaches great importance to maintaining a confidential relationship between the users and Doccle itself. We therefore comply with the provisions relating to the automatic registration of personal data in the Law of 8 December 1992 on the protection of privacy, as amended by the Law of 11 December 1998 and European Directive 95/46 EC.

Doccle also upholds the principles of the European Data Protection Convention of 28 January 1981.

You can use Doccle in various ways: to search for important documents, to share them, to communicate with other people, to exchange information with companies or to add your own documents. When you share your data with us, for example by creating a Doccle profile, we will process this information on your behalf and regard you as the user and owner of the data, over which you need to be able to maintain control. We therefore want to enable you to see at any time what information is used for specific functions, and how you can increase or relax the protection of your privacy.

To this end, Doccle uses special security mechanisms and organisational procedures. The parties involved (the senders of documents, Doccle's suppliers) share this concern and have given a contractual commitment to comply with these rules.

Our privacy policy explains:

- What information we collect and why we collect it.
- How we use this information.

We have tried to keep things as simple as possible. Your privacy is important to Doccle. That's why we ask you (regardless of whether you are a new or an existing Doccle user) to take the time to read through our privacy policy and think about your privacy choices. If you have any questions, you can contact us at the following e-mail address: [security@doccle.be](mailto:security@doccle.be).

## **Data that we receive**

We receive data from various parties. The main parties are you yourself as our user and our partners, who are usually the suppliers from whom you receive documents. Our general principle is that the data we receive from

- you is only visible to you yourself and the third parties with whom you share it
- your suppliers is only visible to you and your supplier

We collect data in two ways:

- Data that you provide us with.
  - You provide us with data when you create a Doccle account. When you do this, we ask you for personal details such as your name, email address and phone number. This information is not shared with others.
  - You provide us with data (such as your debit card number or SEPA data) in connection with the use of functions such as making payments or setting up direct debits. This data is only exchanged with our supplier in the context of delivering optimal services and insofar as strictly necessary for the delivery of services. You can see what data you exchange with which suppliers on the basis of our privacy folder.
  - You provide us with data when you want to use extra features. For each of these features, the privacy folder indicates what information you are sharing, and with whom. You can then decide for yourself at any time whether the amount of data you are sharing is in proportion with the simplicity and the service you have obtained.
- Data that our partners (suppliers such as e.g. your bank or employer) provide us with and that is intended for you.
  - Doccle will be the processor of such data, and the partner or supplier will be the controller (in charge of processing personal data). Doccle will be acting exclusively on behalf of the partner and in accordance with the agreements made in writing with the partner/supplier in this context, as well as and in accordance with applicable law and with governmental rules and guidelines applicable to the partner. This gives you the assurance that your data will be as well protected as it is by the partner from whom you purchase services and obtain information directly.
  - The data that Doccle receives from one partner cannot be consulted by other partners.
  - Doccle will also not combine data from different partners in order to gain new insights.
- Data we receive based on your use of our services.
  - We may collect data about how you use Doccle, such as when you click on buttons, links and other parts of our platform.  
The concrete objectives are listed in article 8.1 of the general terms

and conditions.

- For this use of the data by Doccle for internal purposes, Doccle has the status of controller (in charge of processing personal data), and we will request the necessary permission from those whose data is processed for the following purposes:
  - the forwarding of documents and information (which documents or which information) by you as a user to third parties
  - improving the usability and relevance of the documents for the user
  - the printing out of the documents by the user.
- We may collect data about the system on which you use Doccle to ensure that it functions properly.
  - Device data
    - We may collect device-specific data such as the hardware model or the operating system version.

Doccle only uses cookies to ensure the proper functioning of the application (session cookies), support the help desk chat sessions (session initiated by the user) and anonymous usage statistics to improve application. These can be deactivated / deleted (see browser documentation) by the user in different browsers; which may result in a diminished user experience (e.g. login again). You can adjust the settings of your browser to accept or reject the use of cookies. Since resources vary from browser to browser, please consult the Help menu of your browser for more information. Details can be requested, if necessary, at [security@doccle.be](mailto:security@doccle.be).

#### How we use the data we collect

We use the information we collect to deliver, maintain, protect and improve simple and relevant services to do with digital documents, to develop new ideas and to protect Doccle and our users.

When you contact Doccle, we may record your messages in order to help you solve any problems you are having. We may use your email address to inform you about our services, for example to tell you about upcoming changes or improvements.

We will ask for your consent before using information for purposes other than those described in this privacy policy, also for some purposes described in this Privacy Policy for which Doccle acts as controller (in charge of processing personal data) Doccle saves and processes personal data it receives only on servers in Atos Worldline data centres and which are exclusively in the territory of the EEA (European Economic Area). Doccle is thus not a cloud solution with data floating around on the Internet.

#### **Clarity and options**

People have various concerns about their privacy. It is our goal to be clear about the data we collect so that you can make informed decisions about how your information is used.

## Data that we share

We do not share personal information with companies, organisations or individuals outside Doccle, and also only with Doccle in the context of the purposes described in the privacy policy, except in one of the following circumstances:

- With your explicit permission

We may share personal information with companies, organisations or individuals outside Doccle when you have authorised us to do so. We need express permission to share sensitive personal information.

- For external processing

We provide only personal information to our partners or other trusted businesses or individuals so that they can process it for us, in the context of the purposes described in the privacy policy and based on our written instructions and in accordance with our Privacy Policy and other appropriate confidentiality and security measures.

- For legal reasons

We will share personal information with companies, organisations or individuals outside Doccle if we sincerely believe that access to and the use, preservation or disclosure of such information is necessary to:

- Comply with applicable laws and regulations, legal proceedings or governmental requests.
- Detect, prevent or otherwise address fraud and technical or security problems.

In this case, we will keep the user informed about what data we have shared.

If Doccle is involved in a merger, acquisition or sale of assets, we will continue to ensure the confidentiality of personal data and inform the users concerned before personal data is transferred or becomes subject to a different privacy policy.

### **Scope of application**

Our privacy policy applies to all services provided by Doccle cvba and our partners. The partners are listed on the website [www.doccle.be](http://www.doccle.be).

### **Enforcement**

We regularly review our compliance with our privacy policy. When we receive formal written complaints, we will contact the person who made the complaint to discuss what action should be taken. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to deal with complaints regarding the transfer of personal data that we are unable to resolve directly with our user.

Doccle undertakes to comply fully at all times with existing regulations protecting the privacy of Doccle users. Where necessary, Doccle will seek advice from the Belgian Commission for the Protection of Privacy (the Privacy Commission), the official body charged with monitoring the legislation on the protection of privacy.

Any user whose personal details Doccle holds may send Doccle a dated and signed request by registered letter, including proof of his/her identity (a copy of his/her identity card), in order to obtain written notification of his/her personal details or the modification of incomplete or incorrect information. In accordance with the law, the requested personal data will be communicated within 45 days.

For more general information you can contact the Commission for the Protection of Privacy at the Ministry of Justice, Boulevard de Waterloo 115, 1000 Brussels. (02-542.72.30) ([www.privacy.fgov.be](http://www.privacy.fgov.be))

You can report infringements or submit complaints by email or in writing at the following address:

Doccle CVBA  
Buro & Design Center  
Heyselesplanade PB65  
1020 Brussels

## Changes

Our privacy policy may change from time to time. We will not restrict your rights under this policy without your explicit consent. We will indicate any changes to the policy on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of changes to the policy). We will also keep earlier versions of this policy in an archive that you can consult.