

PRIVACY STATEMENT ACCOUNTANTS ACADEMY BV

Welcome to our website! By using the website www.accountantsacademy.be and the functionalities and products offered on or linked to it (hereinafter collectively the "Platform"), you acknowledge having read this Privacy Statement.

If you have trouble understanding this Privacy Statement or if you do not agree with its content (or parts thereof), we request that you do not use our Platform. In case of questions, you can always contact us via the details mentioned further in this Privacy Statement or on the Platform. We try to make contact with our company as easy and accessible as possible.

The latest version of this Privacy Statement always applies when using the Platform. We recommend consulting this Privacy Statement regularly.

Other relevant conditions for visiting and using the Platform can be found in our General Terms and Conditions and in our Cookie Statement, which together with this Privacy Statement form a whole and are jointly applicable to your visit to the Platform and the use of the functionalities offered thereon.

We value your privacy highly and want to inform you in the most transparent way about our processing activities and your rights regarding them. With this goal in mind, you will find a concise summary of these processing activities below, followed by more extensive information. In case of further questions, you can always contact us.

1. Summary

- **Nature of the Platform:** Our Platform is both informative and transaction-based; you can view information, order training courses, and log in to our learning platform.
- **Data Collection:** Personal data is collected and processed for each of these types of Platform usage. These processing activities are explained further below but obviously only apply when you fall under the relevant category/categories.
- **Use of Data:** Data is primarily used internally to answer your question or fulfill your request, and/or to offer our requested services, as well as to optimize our services in general.
- **No Sharing/Selling:** Data is not shared with third parties who would use it for their own purposes. Nor is your data sold to third parties.
- **Retention:** The data we hold about you is kept for predetermined periods as defined herein and is therefore deleted from time to time, and we protect your data with reasonable measures.
- **Rights:** Note also that the law grants you various rights in connection with the processing of personal data; each of these rights is explained in more detail further in this statement. Although we prefer to resolve any concerns together, you can also always file a complaint with the Belgian Data Protection Authority.

2. Why this privacy statement?

When visiting our Platform, Accountants Academy may process certain (personal) data of the visitor/user (hereinafter "you", "your"). The capacity in which we act (as data controller or as processor) depends on the context in which the processing occurs, as explained in more detail further in this Privacy Statement.

We respect the privacy of the users of our Platform. We will therefore only process your personal data in accordance with Belgian law (in particular the Law of 30 July 2018 regarding the protection of natural persons with regard to the processing of personal data) and the European General Data Protection Regulation (European Regulation 2016/679 or "GDPR Regulation"), as further described in this Privacy Statement.

3. Who processes your personal data?

3.1. Entity Details The Platform is managed by **Accountants Academy BV**, with its registered office at Xavier De Cocklaan 49, 9831 Deurle, and with enterprise/VAT number (BE)0745.369.477 (referred to as "Accountants Academy", "we", "us/our" or any similar expression).

3.2. Contact For privacy-related questions, you can contact us by email via **privacy@accountantsacademy.be**. See also our contact details on the Platform. After you contact us, we will do everything to follow up on your question quickly.

4. What personal data is processed?

Data can be collected via the Platform in various ways, depending on how the Platform is used. To know exactly which data is collected and processed, you will need to check which category/categories you fall under.

4.1. Data collection when simply visiting our Platform

- **(a) Browsing:** You can find further information about our company, read the latest news, look up information about our products, etc., on the Platform. In this case, you can browse our Platform without having to provide information or personal data to Accountants Academy, other than what is included in this Privacy Statement. In other words, you can visit our Platform without providing personal data.
- **(b) Voluntary Submission:** Additionally, there are a number of possibilities on the Platform to voluntarily provide data. For instance, we offer you the possibility to easily contact us via a contact form; strictly speaking, you will need to fill in certain data as well as leave us a message. You can fill in this form to ask us a question, request certain information, etc.. There are also other possibilities to get in touch with us where you must provide certain information to satisfy your request (e.g., booking a demo, requesting a quote, etc.).
- **(c) Newsletter:** You can also subscribe to our newsletter by providing your email address. You can unsubscribe at any time. Note that we add existing customers to our mailing list,

but here too you can let us know if you do not wish this, and you can always unsubscribe from any mailing by using the option provided for that purpose.

- **(d) Legal Basis:** In the above cases, we collect and process only data that you yourself provide to us and for which you give us permission to process it to satisfy your specific request. In this case, we process this data in our capacity as a data controller. Of course, you can also visit our Platform without providing this personal data. In all these cases, you guarantee us that the information provided by you may actually be delivered to us, and that you have the necessary rights (and have obtained any necessary permissions) to deliver this information to us.
- **(e) Statistics & IP:** In addition to the foregoing, we are additionally interested in statistical data that says something about the way our Platform is used and how it functions, for example, the number of website visitors, the popular pages on our Platform, etc.. To this end, we register your IP address. The intention is to better understand the operation of the Platform and improve it where necessary. Additionally, we also track which type of browser you use to access our Platform, to adjust the functionalities on our Platform and optimize where possible. We process this data based on our legitimate interest.
- **(f) Cookies:** We also collect data based on cookies. See more extensive details on this in our Cookie Statement.

4.2. Data collection when ordering e-learnings

- **(a) Ordering:** You can also use the Platform for ordering e-learnings as offered on the Platform and in accordance with the provisions included in the General Terms and Conditions. The following additional processing activities apply. For the aforementioned order, we must obviously collect and process some data. This concerns your identification data, email address, VAT data, payment data, and invoicing data. This data is necessary so that we can complete the order, failing which we cannot execute the order. In this case, we process this data in our capacity as a data controller.
- **(b) Usage Data:** In the context of the execution of the agreement, we also keep data regarding the e-learning that was purchased, such as when the e-learning was viewed.

4.3. Data collection when using the learning platform

- **(a) Context:** In some cases, you will (also) be able to use the Learning Platform, as further described and under the conditions as determined in the General Terms and Conditions. Access to and use of the Learning Platform is always the subject of a separate agreement between Accountants Academy and the relevant client, of which you will then act as an individual user. In this context, we act on the one hand as a data controller and on the other hand as a processor on behalf of our client, as further determined below.
- **(b) Accountants Academy as Controller:** As a data controller, we collect data that allows the use of the Learning Platform as well as data directly related to that use. This concerns the account data of you as a user (i.e., login details to grant you permission to the Learning Platform) as well as the user data we collect that relates to the actual use of the Learning Platform (e.g., login time, login duration, visited pages on the Learning Platform, etc.). That data is necessary to grant you access to the Learning Platform and to be able to execute our

commitments in that regard, as well as to gain the necessary insights into the operation of the Learning Platform and to be able to improve it where necessary. Where an individual user is also designated as a contract manager, that person's data is also used for contract management purposes (e.g., name, communications, etc.). Where you as a user of the Learning Platform contact us directly, we obviously also collect and process this data to respond to your question as well as possible.

- **(c) Accountants Academy as Processor:** As a processor, Accountants Academy also has access to other information related to the use of the Learning Platform, which does not qualify as data for which Accountants Academy acts as a data controller. In this context, Accountants Academy has concluded a data processing agreement with the client which regulates the use of this data by Accountants Academy.

5. Duration of processing and security

5.1. Retention Periods We use the following periods for data retention:

- **(a) General Requests:** We will keep your personal data under article 4.1 in a file for a limited time to make further follow-up of your request possible. We use a standard period of 1 year before deleting data if it is no longer relevant to the question or request (this obviously does not apply when we enter into a contractual relationship, when you join us as an employee or collaborator, etc.).
- **(b) Orders:** We will keep your personal data under article 4.2 for the legal limitation period for contractual claims. This allows us to respond appropriately if questions arise during this period regarding the execution of the agreement we entered into as a party.
- **(c) Learning Platform:** The personal data under article 4.3 for which we act as data controller will be kept for the legal limitation period for contractual claims. This allows us to respond appropriately if questions arise during this period regarding the execution of the agreement we entered into as a party. For the data under that section where we act as a processor, the provisions included in the data processing agreement concluded between the company for which or with which you work and our company apply.

5.2. Security Furthermore, Accountants Academy attaches great importance to the security of your personal data. We secure your personal data during transmission and "at rest". Moreover, we have taken internal organizational and technical measures to secure your data.

6. Which data do we share with third parties?

6.1. General Principle You can count on us wanting to protect your privacy as much as possible. In this context, we want to minimize sharing your personal data with third parties, limiting this only to those third parties that fit within our service provision and/or the explicit question posed to us. In any case, your data is only used for the purposes of the services offered by Accountant Academy and is under no circumstances transferred or sold to third parties or disclosed to third parties who would process it for their own purposes, except as described in this Privacy Statement.

6.2. Internal & Service Providers Within our company, we only share your data with those who need access to it (for example, to answer your question or those managing the Platform). We may also share data, when necessary, with third parties acting on our instruction and with whom we have the necessary contractual agreements or who are subject to a confidentiality obligation (e.g., a lawyer). Accountants Academy can thus work with third parties for the organization of its activities (think of an email program, accounting package, hosting provider, external developer, etc.) but these third parties work and process data only on instruction from Accountants Academy and we take great care in selecting reliable partners.

6.3. External Links Additionally, the Platform may provide links to third-party websites or platforms (e.g., social media). These websites and platforms may have their own terms of use, privacy statement, and cookie statement. We recommend you review these before using these websites/platforms or sharing functions. We accept no liability for any direct or indirect damage resulting from the use of these external websites or platforms.

6.4. Legal Obligations & Reorganization We may also share data with competent authorities authorized to request such data or to whom we must transmit information, or when legally required or pursuant to a legal proceeding or lawsuit. Furthermore, in the event of a reorganization, split, contribution of a business branch, merger or sale of or investment in the company, or any other restructuring, we may transfer all personal data we collect to the relevant third party or parties without needing your specific prior agreement.

6.5. International Transfers We generally have no intention of transferring personal data to other third persons nor to transfer personal data to countries outside the European Economic Area ; should the latter happen, we will ensure appropriate safeguards are taken to protect your data.

7. We also use cookies

7.1. During a visit to our Platform, "cookies" may be placed on your device.

7.2. For a further understanding of the way we use such cookies to collect data, we refer you to our Cookie Statement in which this is further explained.

8. Links

8.1. Our Platform may also contain links. Please note that when clicking these links you will be redirected to websites/platforms to which separate terms of use and privacy provisions apply. Accountants Academy takes no responsibility in this regard, as indicated in the General Terms and Conditions. Nevertheless, we recommend you read these terms of use and privacy provisions carefully before using those websites or platforms.

9. Your rights under privacy legislation

9.1. Overview of Rights Privacy legislation contains a number of rights that you as a person can exercise, albeit under certain conditions. These concern the rights described below. Each of these rights is further written out and explained in the relevant article of the European General Data Protection Regulation 2016/679 of 27 April 2016, also called the "GDPR Regulation", which you can consult here if desired: <https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX%3A32016R0679&qid=1654257390857>.

Note that these rights can typically be exercised vis-à-vis the data controller (and thus when we act as such in accordance with article 4). Where we act as a processor, we have made the necessary contractual arrangements with the company for which or with which you work, and you can exercise your rights via that company.

- **(a) Right of access:** As a data subject, you have the right to obtain confirmation from us as to whether or not personal data concerning you is being processed and, where that is the case, to obtain access to that personal data and accompanying information such as the processing purposes, categories of personal data, recipients, retention period, your rights, source of data, and existence of automated decision-making. This right is described in Article 15 of the GDPR Regulation.
- **(b) Right to rectification:** As a data subject, you have the right to obtain from the controller (us, if we qualify as such) without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This right is described in Article 16 of the GDPR Regulation.
- **(c) Right to erasure ("right to be forgotten"):** As a data subject, you have the right to obtain from the controller (us, if we qualify as such) the erasure of personal data concerning you, and we are obliged to erase personal data when, among other things, the personal data is no longer necessary for the purposes, you withdraw your consent, you object to the processing under certain circumstances, the personal data has been unlawfully processed, etc.. This right is subject to limitations, but we will always act in line with the law. This right is described in Article 17 of the GDPR Regulation.
- **(d) Restriction of processing:** As a data subject, you have the right, within the limits of the law, to obtain from the controller (us, if we qualify as such) restriction of processing if one of the following elements applies: (a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy; (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; (c) we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; (d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject. This right is described in Article 18 of the GDPR Regulation.

- **(e) Right to object:** As a data subject, you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on our legitimate interests. This right can be exercised under the conditions laid down by law. Where personal data is processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing. This right is described in Article 21 of the GDPR Regulation.
- **(f) Right to data portability:** As a data subject, you have the right to receive the personal data concerning you, which you have provided to us as a controller, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the controller to which the personal data was provided, under the conditions as determined in the law (processing is based on consent or a contract, and is carried out by automated means). This right is described in Article 20 of the GDPR Regulation.

9.2. Record Keeping Note that when you exercise certain rights (e.g., also the right to erasure), we may keep information about that exercise of the relevant right in order to be able to meet our obligations regarding compliance with the GDPR Regulation (accountability).

9.3. How to Exercise Rights Any questions about the rights you have, how you can exercise them, or questions regarding this Privacy Statement can be sent to Accountants Academy. Feel free to send these via the contact details included in this Privacy Statement or on our Platform. We will respond to your request as soon as possible. Please note that we may additionally ask you to provide sufficient proof of your identity, in accordance with legal provisions and to protect the privacy of others.

9.4. Refusal of Requests In some circumstances, we may refuse requests or investigate further first and/or request necessary additional information, for example when these are very unclear or suspicious, endanger the privacy of others, are extremely impractical, etc.. Naturally, we always act in line with applicable legislation.

9.5. Right to Withdraw Consent It is important to note that for cases where we process your personal data based on your consent, you have the right to withdraw consent at any time, without this affecting the lawfulness of processing based on consent before its withdrawal.

10. What if you still want to file a complaint?

10.1. If you have complaints or questions, we obviously always prefer to try to reach a joint solution first. We will do our utmost for that. In any case, you have the right to file a complaint with a supervisory authority at any time. In Belgium, this is the Data Protection Authority (see www.gegevensbeschermingsautoriteit.be; address: Drukpersstraat 35, 1000 Brussels; Telephone: +32 (0)2 274 48 00; E: contact@apd-gba.be).

11. Your obligations

11.1. The data provided by you must be accurate and complete. If this is not the case, we reserve the right to suspend our services or take other measures we deem useful. Moreover, you expressly confirm that you have obtained all necessary rights and permissions to provide us with the

information you send us, and you indemnify us for any damage resulting from non-compliance with this obligation.

12. Do you have further questions?

12.1. If you have any further questions, you can always contact us via the contact details included in this Privacy Statement and on the Platform.

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