

Privacy Policy

1. General clause.

1.1 This Privacy Policy governs the processing of personal data by KOWO BVBA/SPRL, with registered offices at 1050 Brussels, Avenue Emile de Béco 83, a company listed in the Belgian Trade and Companies Register under number 0662.515.146 (hereafter “KOWO”).

1.2 The purpose of this Privacy Policy is to specify which categories of personal data KOWO collects through its business activities and its website (www.kowo.io), subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (collectively referred to as “Platform”). It also describes how such data may be processed and disclosed to others. The Privacy Policy further sets out the different measures KOWO has implemented to safeguard the security and confidentiality of the personal data it collects.

1.3 KOWO cares about the privacy of the visitors of its website, users of its applications and all others whose personal data may be collected (hereafter “Visitor” or “you” or “your”) and will only collect and process personal data in accordance with the provisions of this Privacy Policy.

1.4 KOWO is to be considered as the controller of the personal data and will act in accordance with the provisions of all applicable privacy legislation, among which, the Belgian Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data (hereinafter: Privacy Act) as modified by the Act of December 11th, 1998 and the Act of June 13th 2005 on the electronic communication and as further specified in this Privacy Policy.

2. Consent – Third party websites

2.1. If you use the Platform as a visitor, or you decide to sign up or register or you choose to disclose information on the Platform, you agree with the use of these data in accordance with the present Privacy Policy.

2.2. KOWO reserves the right to modify this Privacy Policy at all times, without any prior warning in order to comply with the (changing) legal obligations and/or to improve our service towards you. We therefore advise you to consult the Platform on a regular basis.

2.3. Please note that the Platform may contain links to other websites digital platforms or Internet resources which may collect personal data voluntarily or through cookies or other technologies. KOWO has no responsibility, liability for, or control over those other websites or Internet resources or their collection, use and disclosure of your personal data. KOWO recommends you to review the privacy policies of those other websites and Internet resources to understand how they collect and use personal data.

3. Personal data collected by KOWO. ¹

3.1 The categories of personal data that may be collected are:

1. About a Visitor’s computer and use of the Platform, such as IP-addresses, geographical location, browser type and version, operating system, length and date of visit.
2. Provided by the Visitor when visiting of the Platform, using the services provided by KOWO or communicating with KOWO. This includes data such as: name, email, phone number and interests.

3.2 The use of cookies and web beacons by KOWO is further specified in the Cookie Policy.

3.3 Visitors can’t disclose personal data to KOWO about another person unless this person has consented to this in accordance with this Privacy Policy.

3.4 KOWO will not collect any sensitive data. This includes data such as: data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation from Visitors. KOWO will, if necessary, obtain your explicit consent to collect such data.

4. Purpose of the processing. ¹

4.1 KOWO acts as the controller for the processing of personal data and will process these data for the following purposes: user administration, enhance the functionalities of KOWO’s services, direct marketing among which the sending of a newsletter, the improvement of the content and the quality of the Platform and services, enhance a better compatibility of the Platform and services to the interests, needs and

desires of its Visitors and accurately tracking, improving and completing the personal data as required by law.

4.2. KOWO will ensure that for its marketing activities it will comply with the applicable legislation and that it will obtain the necessary authorizations before the Visitor receives any emails or other electronic communication from KOWO or one of its partners. You can demand at any time to stop the sending of such information.

5.The Visitor's rights.

5.1. Each Visitor has the right to access, modify, correct and delete his or her data. He or she can also, free of charge and upon request, oppose him or herself against the processing of his/her personal data for direct marketing purposes. These data can be transmitted to third parties within the limits and conditions as set out under section 6 of this Privacy Policy, except in case of an opposition hereto. The aforementioned right can be exercised by writing to KOWO at the following email address privacy@kowo.io accompanied by a copy of the front side of his or her identity card.

5.2. KOWO takes all reasonable measures to ensure the confidentiality of the personal data which are disclosed by the Visitor. However, each Visitor recognizes that the disclosure of personal data via the internet is not without any risks. The Visitor consequently acknowledges that KOWO cannot be held accountable or liable for any potential direct and indirect damage he/she would suffer as a consequence of an illegal or illegitimate use of his/her data by third parties who do not have the authorization to use these data.

6.Disclosure of personal data.

6.1. Although KOWO may transfer personal data to so-called service providers who process data in its name, KOWO will not share data with third parties for secondary or unrelated purposes unless otherwise stated when collecting these data. KOWO will however share your personal data with its clients in order to comply with the obligations set out under the Terms of Service⁴.

6.2. Where appropriate or required, KOWO will be entitled to transmit personal data to law enforcement authorities, regulatory or other government agencies, or third parties where necessary or desirable to comply with legal or regulatory obligations or in the context of the above-mentioned purposes.

7.Retention period.

KOWO does not store the data longer than legally admissible and in any case not longer than required for the purposes mentioned hereafter.

8.International data transfers.

8.1 KOWO will not transfer any personal data to countries which do not have data protection laws equivalent to those in force in the European Economic Area.

8.2 The personal data may be stored and processed within the European Economic Area insofar this is necessary to achieve or compatible with the purposes of the processing.

9.Security of data

9.1 KOWO uses generally accepted and reasonable methods consistent with current technological developments with regard to the operational security to offer protection against loss, abuse, alteration or destruction of all information submitted by Visitors.

9.2 The Visitor acknowledges that the transmission of data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

10. Registration with the supervisory authority.

10.1 KOWO has registered its business activities as a data controller with the Belgian Privacy Commission.

10.2 This declaration can be consulted in the public register on the following website: www.privacycommission.be.

11.Amendments to the Privacy Policy.

KOWO may update this policy from time to time by publishing a new version on the Platform. We recommend that you regularly check the Privacy Policy as those changes are binding upon you.

12.Visitors' questions

If you should have any questions about this Privacy Policy or the feeling that your interests are not or

inadequately represented, you can address all your questions to Kowo at the following email address privacy@kowo.io

13. Competent Court and Applicable Law

This Privacy Policy shall be governed by - and construed in accordance with - the Belgian legislation.

The competent courts for disputes regarding this Privacy Policy will be the courts of Brussels, unless otherwise imposed by mandatory statutory provisions.

Cookie Policy

1. General information

1.1 This Cookie Policy governs the usage of cookies by KOWO BVBA/SPRL, with registered offices at 1050 Brussels, Avenue Emile de Béco 83, a company listed in the Belgian Trade and Companies Register under number 0662.515.146 (hereafter “KOWO”) through its business activities and its website www.kowo.io subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (collectively referred to as “Platform”).

1.2 Cookies are being collected from the Visitors of this website in accordance with the provisions of this Cookie Policy.

2. How KOWO uses cookies

1. What are cookies?

A cookie is a small piece of data sent from a website and stored in a Visitor’s web browser. When the Visitor browses the same website in the future, the data stored in the cookie can be retrieved by the website to notify the website of the Visitor’s previous activity. It helps the website to remember information about the Visitor’s visit. The Visitor can choose to turn cookies on or off. Cookies do not typically contain any information that personally identifies a Visitor, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Further information on cookies can be found on <http://www.allaboutcookies.org/> or <http://www.aboutcookies.org/>.

2. Purposes of the use of cookies

KOWO uses cookies to remember the preferences of the Visitor on the Platform and to show more relevant services and offers. Cookies are also being used to enable the Visitor to move around the Platform and to provide certain features. Another use of cookies is to secure a safe visit on the Platform. They also help us to optimize a visit to the Platform from the Visitor.

3. Which information is being collected?

Cookies may include clicking on particular buttons, logging in or a record of which pages were visited by the Visitor. This cookie policy is in accordance with the Belgian law (Belgian Act of 10/07/2012 laying down provisions on electronic communications, BS 20/9/2012).

4. Which types of cookies are being used?

Name	Category of use	Description	Example
Strictly necessary cookies	Security Processes	These cookies are strictly necessary to enable the Visitor to move around the Platform or to provide certain requested features	
Tracking cookies	Preferences	These cookies outlast Visitor sessions. If a persistent cookie has its max-age set to 1 year, then, within that year the initial value set in that cookie will be sent back to the server every time you visit the server. This is used to record a vital piece of information such as how a Visitor initially came to the Platform.	Preferred language: once the Visitor has selected his preferred language the persistent cookie will ensure that once revisiting the Platform, the content is delivered in the preferred language of the Visitor.

Performance cookies	Analytics	These cookies help to improve the performance of the Platform, providing a better Visitor experience.	Google Analytics helps Kowo to analyze how Visitors use the Platform. It registers the number of visitors and tell things about their behavior overall, such as the typical length of a visit or the average number of pages a Visitor views.
	Authentication, Security, and Compliance	Intended to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements	or example, we use Cookies to determine if you are logged in.

5. Managing cookies in your browser

Some people prefer not to allow cookies. That’s why browsers give the ability to manage cookies. Please visit the websites of the different browsers to learn how to block the storage of cookies. It is also possible to delete current installed cookies on your computer.

6. Changes in the Cookie Policy

KOWO may update this policy from time to time by publishing a new version on the Platform. It is recommended that Visitor checks the Cookie Policy regularly.

[a]Please check and complete where required

[b]Please adapt, strike or complete where necessary.

This is very important since it determines the limits within which Kowo can collect the data.

[c]Insert link

[d]Please implement a pop-up in which the visitor explicitly agrees with the use of cookies.

For ex.: We are using cookies to provide statistics that help us give you the best experience of our site. You can find out more or switch them off if you prefer

[e]Please check and modify/complete where required