

# UBENCH INTERNATIONAL NV

## Privacy Statement

*Version d.d. 29/10/2024*

We understand that your trust in us is UBench's most important asset. As such, your privacy is essential for us. This privacy statement (hereinafter referred to as "**Statement**"), applies to every (commercial) relation between you, acting in your capacity as a natural person, and the public limited liability company "**UBENCH INTERNATIONAL**", with registered office at Antoine Coppenslaan 27 box 3, 2300 Turnhout, registered in the register of legal entities of Antwerp, section Turnhout, and known to the VAT-administration under the number BE 0860.448.495 (Hereinafter referred to as "**UBench**", "**we**" or "**us**"). In these relations UBench will, depending on the precise processing, act as the controller or as the processor of personal data. In this Statement we wish to inform you about how we handle your personal data.

When you or any other company with which you have a (commercial) relation, provides us with personal data, e.g. when you contact us or conclude an agreement with us, we will handle the personal data as set out in this Statement.

If we want to use your personal data beyond the purpose of mere business operations, we will ask for your explicit consent.

### **1/ Types of personal data**

UBench collects and processes the following personal data:

#### **1.1/ Personal data for which UBench acts as the data controller**

To support our customers in using the UBench platform, streamline onboarding for new customers, execute software projects, and drive sales and marketing initiatives we gather the following information:

- Contact information from customers, leads and other business contacts and partners.
  - Name;
  - Surname;
  - Telephone number (landline and/or mobile phone);
  - E-mail address;
  - Gender;
  - File number
  - Profession/Job Title
- Any other communications necessary for the performance of the customer agreement or to attract new business
  - Email exchanges, meeting notes, support tickets, quotes, ...

The information is stored in our CRM tool Hubspot.

### **1.2/ Personal data for which UBench acts as a data processor, on behalf of its customers**

We store the following personal data necessary for efficient and proactive vehicle lifecycle management: accident handling, car maintenance, car rental and used vehicle sales:

- Name
- First name
- Account name
- Password
- Company name
- Home address
- Company address
- E-mail address
- Date of birth
- Telephone number (land line/mobile)
- Preferred means of communication
- Other, being:
  - ✓ Information about the vehicle
  - ✓ Camera footage of (damage to) the vehicle
  - ✓ Police reports
  - ✓ Any other Personal Data provided for Processing by the Controller

This information is stored on the UBench platform.

If you want more information about what personal data we possess of you, please read paragraph 6 “Your privacy rights” in this Statement.

### **2/ Methods of personal data collection**

These personal data are collected within the framework of the following activities:

#### **2.1/ Personal data for which UBench acts as the data controller**

This information is gathered in the following ways:

- Via the contact form on the UBench website
- Through trade fairs and marketing events
- Through the exchange of business cards
- Through email communication with customers and leads during the sales process.
- Through email communications with customers necessary for the performance of the agreement (customer success management, project management).

## 2.2/ Personal data for which UBench acts as a data processor, on behalf of its customers:

UBench receives personal data via its platform, where the data is entered by you or by our customers. Our customers guarantee that conform the applicable legislation, they are entitled to have these data processed by UBench.

UBench employees have access to production data for customer support and troubleshooting, on a need-to-know basis.

In the event you would like to oppose to this processing, please read paragraph 6 “Your privacy rights” in this Statement.

## 3/ Use of personal data

We can use these personal data for the following purposes:

Activity	Personal data regarding which UBench acts as the controller	Personal data regarding which UBench acts as processor on behalf of its customers	Legal basis
Performance of the agreement	X	X	Contract
Customer support	X	X	Contract
Sales and Marketing	X		Legitimate Interest
Sending electronic non-commercial correspondence (newsletters, invitations to events, etc.)	X		Legitimate Interest

In the event you receive unwanted newsletters or any other correspondence, please read paragraph 6 “Your privacy rights” in this Statement.

## 4/ Transfer of personal data towards third parties

### 4/ Transfer of personal data towards third parties

UBench shall not transfer your personal data to third parties, unless this is necessary to (i) perform the contract or (ii) to render a specific service. If it is necessary for UBench to transfer your personal data to third parties, the third party concerned is required to process your personal data in accordance with the provisions of this Statement.

Notwithstanding the foregoing, it is possible that we disclose your personal data to the appropriate authorities if we are legally obliged to do so, regarding any (future) legal proceedings or to safeguard and defend our rights.

In the event you want more information regarding this, please read paragraph /6 “Your privacy rights” in this Statement.

## **5/ Storage of personal data**

UBench shall only store your personal data for the period necessary to achieve and fulfil its business operations.

In practice, the duration of the storage depends on the purpose for which we collect and process the data. In general, we store the personal data for the period necessary to achieve and fulfil the goals as set out in paragraph 3/ of this Statement.

In the event you want more information or wish to oppose to the storage of your personal data, please read paragraph 6 “Your privacy rights” in this Statement.

## **6/ Your privacy rights**

If you wish to invoke your privacy rights, as stated by applicable legislation or set out below, please contact our Data Protection Officer ([dpo@ubench.com](mailto:dpo@ubench.com)) or complete the form for exercising your privacy rights and deliver it by email or post:

UBench International NV  
T.a.v. DPO  
Antoine Coppenslaan 27 bus 3  
2300 Turnhout

In the light of processing your personal data, you enjoy the following privacy rights:

- Right of access to your personal data;
- Rights to rectification, completion or update of your personal data
- Right to delete your personal data (‘right to be forgotten’),
- Right to limit the processing of your personal data
- Right to transferability of your personal data
- Right to object/oppose to the processing of your personal data

If you no longer wish to receive newsletters or information about the services of UBench, you can unsubscribe at any time by clicking the “unsubscribe” button in each of UBench’s emails.

When you contact UBench to exercise your privacy rights, UBench, acting in its capacity of processor and thus to the extent processing your personal data on behalf of a third party, will contact the controller in order to handle your request in the most efficient way.

The exercise of these rights will be free of charge for the data subject, regardless whether this right is exercised via email or the standard form.

## **7/ Security of personal data**

UBench fully acknowledges the importance of information security to our customers, and we are therefore proud to be ISO 27001 certified.

The international ISO 27001 standard mandates to establish and maintain an effective information security management system, using a continual improvement approach.

Moreover, it ensures that

- Customer data is rigorously protected
- Risks and vulnerabilities are systematically assessed, minimized and eliminated.
- UBench is compliant with the highest standard for information security
- UBench fosters an internal culture of information security, making all employees prioritize information security by design.
- Operational excellence when it comes to our IT, HR, and information processes

### **8/ Cross-border processing of personal data**

For the activities listed in /3, UBench does not transfer any personal data to third parties who are located outside the European Economic Area.

### **9/ Techniques used on the UBench platform and purposes**

#### **9.1/ Google Maps**

We use Google Maps for maps, locations and route planning. It is used to help the driver find the repairer closest to the driver's location/home or workplace, and to propose the most convenient route to the repairer.

Google Maps is run by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When using Google Maps your IP address is transferred directly to Google and a cookie is stored. You can obtain information and opt out at any time from data processing by Google at

<https://www.google.de/intl/de/policies/privacy>.

Google maps is a convenient and time-saving tool for drivers and driver desk staff, and therefore represents significant added value for the UBench platform. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

#### **9.2/ Google reCAPTCHA**

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited.

Provider: Google Ireland Limited

Personal Data collected: Usage data, Cookies

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

Google reCAPTCHA protects the UBench platform from automated bots, reducing the risk of ddos, spam, unauthorized access, and other security incidents. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

### 9.3/ Matomo

We use the web analysis service Matomo to analyze the usage of our platform. The anonymized statistics we obtain help us improve our product, making the UBench platform more tailored to our users' needs and easier to use.

Matomo logs the account name and ip address, but the user behavior data is processed solely in an anonymized form. We use Matomo in cookie-less mode. However, if you prefer not to have Matomo gather any user behavior data from you, you can enable the "Do Not Track" setting in your browser.

The legal basis for using Matomo is our legitimate interest, as outlined in Article 6(1)(f) of the GDPR. For more information about Matomo's data privacy practices, please visit [Matomo's privacy page](#).

### 9.4/ Cookies

We use cookies on the UBench **website** for analytics and marketing. You find more information in our cookie policy. You can enable/disable analytics cookies and marketing cookies via the cookie banner in the footer of the UBench website home page (cookie setting).

The UBench **platform** only uses necessary cookies.

## 10/ Update Privacy Statement

UBench is entitled to update this Privacy Statement by posting a new version on the website. The most recent version of the Privacy Statement can always be found on our website (<http://www.ubenchinternational.com/>). As such, we strongly recommend to regularly consult the website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

## 11/ Complaints

If you have any concerns or complaints about use, collect and/or process personal data, we encourage you to contact us so we can address your concerns directly. However, you also have the right to lodge a complaint with the Data Protection Authority. (<https://www.dataprotectionauthority.be/citizen>)

## 12/ Contact

Notwithstanding the right to lodge a complaint as described under title 11/, we kindly request that any questions and/or remarks you have about this Privacy Statement or the manner in which we collect, use and/or process your personal data, to contact us:

- (i) Via e-mail [dpo@ubench.com](mailto:dpo@ubench.com) ;
- (ii) Via regular post:

UBench International NV  
T.a.v. DPO  
Antoine Coppenslaan 27 bus 3  
2300 Turnhout