



PRIVACY

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1 PRIVACY STATEMENT SMARTECHO

Last update: 06/06/2025

At SmartEcho (Cloud Group NV), we attach great importance to the protection of personal data. In this privacy statement, we explain which personal data we collect, how we process it, the purposes for which we use it and your rights as a data subject. We always process personal data in accordance with applicable data protection legislation, including the General Data Protection Regulation (AVG / GDPR).

2 DATA CONTROLLER

This privacy notice applies to the processing of personal data by:

- SmartEcho (Cloud Group NV)
- Delacensierstraat 14
- 2018 Antwerp, Belgium
- Ondernemingsnummer: BE0533.928.877
- E-mail: privacy@smartecho.com

3 CONFIDENTIALITY OF DATA

SmartEcho and its partners undertake:

- to use confidential information only for the performance of the agreed service;
- not to disclose confidential information to third parties without prior written consent, unless required by law;
- take all reasonable measures to protect the confidentiality of data.

Confidential information includes technical data, commercial information, tariffs, customer data, know-how, software, infrastructure and other non-public information.

4 PROCESSING OF PERSONAL DATA

SmartEcho processes personal data in accordance with the AVG and other applicable laws.

In most cases, we process personal data as a data controller, for example in the performance of contracts with customers, billing, customer service and legal obligations.

When SmartEcho processes personal data on behalf of a customer (e.g. in managed services), we act as a processor, in accordance with the processor agreement.

5 PURPOSES OF PROCESSING

Personal data will only be processed for:

- performance and delivery of services;
- customer management and administration;
- invoicing and contract management;
- technical support and customer service;
- compliance with legal obligations;
- security, quality control and optimisation of our services.

Use of personal data for promotional purposes is only done with prior consent, if required by law.

6 SHARING OF DATA WITH THIRD PARTIES

Personal data will only be shared:

- with subcontractors or service providers of SmartEcho, if necessary for the provision of services;
- with third parties if required by law;
- never with third parties for commercial purposes without your explicit consent.

Appropriate contractual safeguards will be agreed with all sub-processors.

7 SECURITY OF PERSONAL DATA

We take technical and organisational measures to protect personal data against:

- unauthorised access;
- loss or destruction;
- alteration or unauthorised disclosure.

Our employees and processors are contractually bound to confidentiality.

8 RIGHTS OF DATA SUBJECTS

As a data subject, you have the following rights:

- right of access;
- right to rectification or erasure;
- right to restriction of processing;
- right to object;
- right to data portability.

Requests to exercise these rights can be made via privacy@smartecho.com.

Where SmartEcho acts as a processor, requests should go through the data controller (the customer).

9 NOTIFICATION OBLIGATION IN CASE OF DATA BREACH

In the event of a personal data breach:

- affected parties and regulators are informed without delay;
- legal deadlines are strictly observed;
- cooperation is ensured in following up the notification.

10 INTERNATIONAL TRANSFER

Personal data are in principle only processed within the European Economic Area (EEA).

Any transfers outside the EEA are made only subject to compliance with the AVG and appropriate safeguards.

11 COOKIE POLICY

11.1 What are cookies?

Cookies are small text files that are stored on your device when you visit our website. They allow us to analyse your browsing behaviour, save settings and improve the functionality of the website.

11.2 What cookies does SmartEcho use?

11.2.1 Essential cookies (necessary)

Necessary for the proper functioning of the website. Without these cookies, certain parts of the website do not function correctly. No consent is required for these cookies.

11.2.2 Functional cookies

Improve the user experience, such as remembering language choices or login preferences.

11.2.3 Analytical cookies

Measure website usage and help to optimise the functioning of the website. We use anonymised statistics for this purpose.

11.2.4 Marketing and tracking cookies

These cookies track your browsing behaviour and can be used for marketing purposes or personalised advertisements. For these cookies, we always request your prior consent via the cookie banner.

11.3 Managing cookie settings

On your first visit to our website, you will be given the opportunity to set your cookie preferences via the cookie banner. You can adjust these settings at any time or withdraw your consent.

11.4 Cookie retention periods

Essential and functional cookies: stored for as long as functionally necessary.

Analytical cookies: stored for a maximum of 24 months.

Marketing cookies: in accordance with your consent settings, for a maximum of 12 months.

12 CONTACT DETAILS

For all questions, requests or complaints relating to privacy and data processing:

- SmartEcho (Cloud Group NV)
- Delacensierstraat 14
- 2018 Antwerp, Belgium
- E-mail: privacy@smartecho.com

You also have the right to complain to the Belgian Data Protection Authority (GBA):

Printing Press Street 35, 1000 Brussels - contact@apd-gba.be

13 CHANGES

SmartEcho reserves the right to amend this privacy statement.

The most up-to-date version is always available on our website.