

# Privacy and security

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 [silverfin.com/privacy](https://silverfin.com/privacy)

Date of last amendment: August 4, 2020.

## Please read this Privacy Policy Statement thoroughly.

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**This Privacy Policy Statement contains important information with respect to the following matters:**

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- what Personal Data we collect from you and for which purpose; through our website [www.silverfin.com](https://www.silverfin.com), [www.getsilverfin.com](https://www.getsilverfin.com) and [www.silverfin.be](https://www.silverfin.be) (the “Website”) and the Silverfin platform (the “Platform”);
- the measures to safeguard the security of your Personal Data;
- and your rights with respect to your Personal Data.

Silverfin explicitly confirms that all Personal Data are processed in accordance with the Belgian law of 8 December 1992 and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (“General Data Protection Regulation” or “GDPR”). All capitalized terms not defined in this Privacy Statement will have the meaning as set forth in the GDPR.

### 1. Applicability

This Privacy Statement applies to the processing and transmission of Personal Data by Silverfin NV, with registered office at Gaston Crommenlaan 12, 9050 Gent, Belgium and registered with the Crossroads Bank for Enterprises with enterprise number 0524.802.662, including all subsidiaries of Silverfin NV (“Silverfin” or “we”) via or Website or the Platform.

By using the Website or the Platform or by providing us with Personal Data, the Customer explicitly agrees with the manner of processing and collection by Silverfin of his/her Personal Data in accordance with this Privacy Statement.

### 2. Personal Data

By using the Website or the Platform, Silverfin collects and processes your data. Some elements of such may qualify as Personal Data. Silverfin collects Personal Data through the following channels:

- Personal Data provided by yourself through input on the Website or Platform: for example, contact details when subscribing to a newsletter, or account details for use on the Platform;
- Personal Data provided by a subscriber of the Platform through input on the Platform, for example, invoice details. For such Personal Data, Silverfin will act as Processor;

- Personal Data collected by Silverfin through the use of the Website or the Platform: for example, through the use of cookies.

Silverfin may process following Personal Data in accordance with this Statement:

- name;
- contact information (such as address, e-mail address and phone number);
- technical data (such as IP-address);
- commercial data (e.g. Invoicing details, address, bank account number);
- accounting data and other related financial data.

Silverfin will store and process your Personal Data on its servers located within the European Economic Area.

### 3. Purpose of the Processing

Silverfin will process your Personal Data for following purposes as Controller of the processing:

Administration concerning the Silverfin events, the Platform and related services;

- which you may withdraw at any given moment upon first request;
- Direct marketing via other channels: Silverfin may process your Personal Data to keep you updated of its events and its services. You explicitly consent to this specific processing which you may withdraw at any given moment upon first request;
- Technical support and monitoring of your use of the Website and the Platform to ameliorate your user experience and to improve our Website and Platform;
- In our capacity as (sub-)Processor.

In addition, Silverfin will process Personal Data on behalf of its customer, in a capacity of Processor or Sub Processor, as follows:

- in the event your Personal Data were provided by a user of the Platform (e.g. your invoicing details by an accountant using the Silverfin Platform).
- If you have explicitly consented to direct marketing through the Platform: you may receive targeted direct marketing with respect to the purchase of goods and services that may be advantageous on the basis of your accounting data (including the Personal Data); You will be requested to provide your explicit consent for this specific processing

For above-mentioned processing activities in a capacity of Data Processor, Silverfin will act under the responsibility of the Data Controller and in accordance with the processor agreement concluded between Silverfin and the Controller.

### 4. Security

Silverfin shall take appropriate technical and organizational measures that are necessary for the protection of the Personal Data against accidental or unauthorized destruction, against accidental loss, as well as against the modification of or access to, and any other

prohibited processing of the Personal Data. These measures will ensure an appropriate level of security.

#### 5. Rights of the concerned person

##### **Right to access**

If you would like to view your Personal Data that has been processed by Silverfin or have any questions about the processing of your Personal Data, you are entitled to exercise your right to access. Silverfin will then provide you with information about the Personal Data that is being processed and on the source of such Personal Data.

##### **Right of rectification or deletion**

You have the right to request us, free of charge, to correct any incorrect Personal Data if such Personal Data would be incomplete or inaccurate. You have the right to request deletion of your Personal Data by Silverfin.

##### **Right to object free of charge**

You are entitled to object at any time and without any motivation to the processing of your Personal Data in accordance with this Privacy Statement.

##### **Other Rights**

You have the right to request all your Personal Data in a structured and generally accepted file format.

You have the right to file a complaint with the competent supervisory authority should the processing of your Personal Data violate the applicable regulations.

Each request to exercise your above-mentioned rights or any other questions concerning this Privacy Statement shall be addressed to [info@silverfin.com](mailto:info@silverfin.com) or by writing to Gaston Crommenlaan 12, 9050 Gent, Belgium.

#### 6. Term Disclosure of Personal Data

For certain purposes it may be required for Silverfin to share your Personal Data with third parties. You, therefore, provide your express consent to share your Personal Data as described in this Privacy Statement. Silverfin's Processors and sub-processors always act under our responsibility and in accordance with a processor agreement entered into between Silverfin and its (sub-)Processors.

Other than as set out in Article 3, Silverfin will never share or sell your Personal Data with third parties for commercial purposes.

#### 7. Terms

Silverfin will save and process your Personal Data in accordance with this Privacy Statement until you withdraw your consent to process Personal Data in accordance with this Privacy Statement, or until the termination of the contractual relationship with the Controller (or Processor).

## 8. Updates of our changes to the Privacy Policy Statement

Silverfin is entitled to occasionally review and change this Privacy Statement in order to allow us to use your Personal Data for other purposes than those mentioned herein.

If Silverfin would process your Personal Data in a manner different from that stated at the time of the collection of the Personal Data, we will provide you with a notice on our Website and on our Platform indicating that the Privacy Statement has been changed or updated and you shall have the possibility to object your consent in this respect.

## 9. Cookies

By using the Website and Platform certain Personal Data is being processed that is being collected automatically through the use of cookies such as IP-address, your type of browser and operating system, the number of times you visited the website and the pages you visited. This data is only being used to improve the Website and Platform and shall not be used for marketing purposes.

A cookie is a small amount of data generated by a website and saved by your web browser. Its purpose is to remember information about you. Cookies make it possible for a website to recognize your browser and to surf quick and easily on a website. If you don't want a website to place cookies on your computer, you can change the settings of your browser accordingly.

There are different types of cookies, which can be divided into three categories:

**Necessary and Functional cookies:** They are generally used to store and manage a unique identity, and to make the difference between the visitor and other users who visit the site at the same time, in order to provide a consistent and accurate service to each visitor and to improve the functionality of the site. They are usually the result of a visitor action, but can also be implemented as part of the provision of services that are not expressly required by visitors, but are offered to them. For example, cookies that memorize the content already visited on the Website, or the e-mail address and password you entered to log in during a previous visit. They can also be used to prevent from offering to the visitor a service that he has previously been offered and that he has refused. The use of functional cookies may also help us to provide content tailored to your interests, and save you time to connect again or to provide us again with certain information when you visit the website or try to access certain parts reserved for members.

**Statistics:** They are limited to improving the performance and the Website and to understand how visitors interact with websites by collecting and reporting information anonymously. The main function of a performance cookie is to measure and monitor the visitor's activity of the site. A performance cookie will help generate statistics and is used by webmasters using Google Analytics for tracking and analyzing online activities on their website.

**Marketing:** Those contain a unique key that is able to distinguish the search patterns of individual visitors, or may contain a code that can be turned into a series of browsing habits or information about preferences of use, which are stored elsewhere.

Silverfin uses functional cookies on its Website and in the Platform that are required for the good performance, maintenance and support of the Platform. You may disable the use of cookies through your browser, but this may have an impact on the performance and functioning on the Website and the Platform.

In addition, Silverfin uses the following cookies of third parties on the Website:

### **Google Analytics**

Silverfin only tracks anonymized IP addresses in the context of Google Analytics. You can find out more about how Google uses your data at <http://www.google.com/analytics> and [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

### **HubSpot**

Silverfin uses Hubspot to support its marketing and sales efforts. Please visit [HubSpot](#) for more information.

### **LinkedIn (analytics)**

Silverfin uses LinkedIn to communicate and to measure the effectiveness of campaigns. Please visit [LinkedIn](#) for more information.

### **Facebook (analytics)**

Silverfin uses Facebook to communicate and to measure the effectiveness of campaigns. Please visit [Facebook](#) for more information.

### **HotJar (analytics)**

Silverfin uses HotJar to measure and understand the user experience. Please visit [Hotjar](#) for more information.

### **Wistia (Analytics)**

Silverfin uses Wistia to host and playback videos on our site. Wistia uses cookies to collect information relating to how users interact with our videos. This data may be used to communicate with you. Please visit [Wistia](#) for more information.

### **Heap.io (Analytics)**

Silverfin uses Heap to measure and understand the user experience. Please visit [Heap](#) for more information.

Should you be averse to the collection of cookies by this Website or any other Website, there are actions you can take with your personal Web browser settings.

Web browser settings can be adjusted to perform one or more of the following actions: delete all cookies, block all cookies, allow all cookies, block third-party cookies, clear all cookies when you close the browser, open a 'private' browsing session, install add-ons and plug-ins to extend browser functionality as it pertains to cookies.

Please click on the links below to access more information and learn how to adjust cookie settings for a particular web browser.

- [Internet Explorer](#)
- [Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Opera](#)

More information on cookies can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Questions about security?**

**Contact us**

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