

Privacy Statement Website

Setle attaches great importance to your privacy and to handling your personal data with care. That is why we do our utmost to explain, in this privacy statement written in clear and understandable language, which personal data we collect about you, what we use it for, and what your rights are in this regard.

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1. Who are we?

“We”, “us” or “our” means Setle BV, with registered office at Wijerstraat 4, 3520 Zonhoven, and with company number 0666.412.269.



If you have any questions, comments, or complaints regarding this privacy statement or the processing of your personal data, or if you wish to exercise any of your rights, please contact us by e-mail at privacy@setle.app.

2. Scope

This privacy statement applies to this website, our direct marketing activities, and the general organisation of Setle.

3. Why and how do we process your personal data?

If you visit our website and/or are in contact with us, certain personal data may be processed. Below you will find more information about the various processing activities that may apply to you.

3.1. Use of our website

When you visit our website, we may process personal data using online techniques such as cookies, trackers, scripts, and similar technologies (hereinafter referred to as 'cookies'). This may involve (1) essential cookies that are strictly necessary to send a message over an electronic communications network, to guarantee the security of our website, or to store information about the provision of a service you have expressly requested; (2) functional cookies that further shape your use of our website; (3) analytical cookies to measure and analyse your use of our website; (4) marketing cookies to provide you with (personalised) advertisements; and (5) other third-party cookies that we allow on our website.

You can find more information about this in our cookie statement.

3.2. Contact via the website

Consent - Contact forms are available on our website to get in touch with us. You can also always reach us by e-mail or telephone. We process this personal data to handle your contact request, but we have no visibility or control over any other personal data you share with us through the open input fields. We ask that you do not include any confidential or sensitive information here.

This processing takes place on the basis of your consent. Please note that you can withdraw it at any time. This withdrawal does not affect the lawfulness of the processing carried out before the withdrawal of your consent.

- **What personal data do we process?**
 - Identification and contact details
 - Other data that may be spontaneously shared in the contact form
- **How do we obtain this personal data?** Directly from you when filling in our contact form
- **How long do we keep it?** Up to 1 year after the contact request has been handled
- **With whom can we share this personal data (other than affiliated and associated companies)?** Processors (such as, for example, our hosting partner) that we rely on in connection with our website, contact, or relationship management
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.3. Management of customer relationships (incl. prospecting new customers)

Legitimate interest - Setle has a legitimate interest in developing its business by identifying and engaging with potential customers, maintaining relationships with existing customers, and promoting its services. In this context, your personal data is processed (e.g. to invite you to other forms of communication, an event, etc.).



This processing takes place on the basis of Setle's legitimate interest. You can always object to this in accordance with the conditions described under 'right to object' in the chapter 'What are your rights and how can you exercise them'.

- **What personal data do we process?**
 - Identification and contact details
 - Other data as may come up during further contacts:
 - Occupation-related data
 - ...
- **How do we obtain this personal data?** Directly from you through relationship management
- **How long do we keep it?** Up to 7 years after the completion of a last assignment or contact
- **With whom can we share this personal data (other than affiliated and associated companies)?** Processors (such as, for example, our CRM platform) that we rely on for our relationship management
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.4. Sending newsletters

Consent - You can subscribe to our newsletter on our website. We process this personal data in order to contact you whenever a new newsletter is available for you.

This processing takes place on the basis of your consent. You have the option to withdraw your consent at any time, without this affecting the lawfulness of the data processing carried out up to the point of withdrawal. In practice, this means that your consent remains valid for all previous newsletters, but you will no longer receive newsletters.

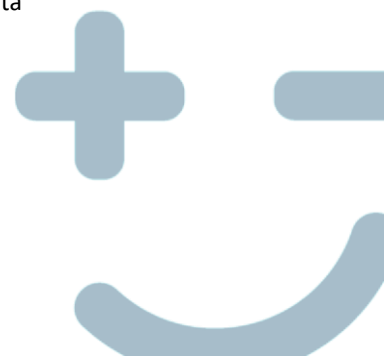
- **What personal data do we process?** Identification and contact details
- **How do we obtain this personal data?** Directly from you when you subscribe
- **How long do we keep it?** As long as consent has not been withdrawn
- **With whom can we share this personal data (other than affiliated and associated companies)?** Processors (such as, for example, our e-mail platform) that we rely on in connection with our website or the delivery of newsletters
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.5. Recruitment and selection

Consent for (unsolicited) applications and maintaining a recruitment pool - Legitimate interest for active recruitment

When you apply (whether unsolicited or otherwise) for a position at Setle, Setle processes personal data about you. We do this in order to recruit and select employees for current or future vacancies. This processing (including maintaining a recruitment pool) takes place on the basis of your consent. You have the option to withdraw your consent at any time, without this affecting the lawfulness of the data processing carried out up to the point of withdrawal.

When Setle itself actively recruits, Setle processes personal data about you. This is done solely on the basis of data that is publicly available about you (e.g. on platforms such as LinkedIn and Google) or data provided to us by third parties. This processing takes place on the basis of Setle's legitimate interest. You can always object to this in accordance with the conditions described under 'Right to object' in the chapter 'What are your rights and how can you exercise them'.



Finally, we note that we rely on our legitimate interest to pass on your personal data, in connection with our recruitment process, to companies affiliated and associated with us. We naturally do this always with a view to finding a suitable assignment for you. You can always object to this in accordance with the conditions described under 'right to object' in the chapter 'What are your rights and how can you exercise them'.

- **What personal data do we process?**
 - Identification and contact details
 - Other data as may be included on your CV:
 - Personal characteristics
 - Social contacts
 - Psychological data (e.g. a description of your personality or character)
 - Household composition
 - Leisure activities and interests
 - Academic background
 - Professional competence
 - Professional experience
 - Membership of/participation in professional organisations
 - Current position
 - Career history
 - Socio-economic data (e.g. (partial) disability)
 - Current salary
 - Current fringe benefits
 - National register number
 - ...
- **How do we obtain this personal data?**
 - (Unsolicited) application: directly from you when you apply
 - Active recruitment: through third parties such as public platforms or intermediaries
- **How long do we keep it?**
 - For unsuccessful applicants: we keep the personal data relating to your application for a maximum of 1 year after the application.
 - For applicants in our recruitment pool: as long as consent has not been withdrawn, and for a maximum of 3 years after the application.
- **With whom can we share this personal data (other than affiliated and associated companies)?**
 - Processors (such as, for example, recruitment agencies) that we rely on to recruit and select
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.6. Management of supplier relationships (incl. prospecting new suppliers)

Legitimate interest - Setle works together with suppliers, actively makes new contacts for this purpose, and builds relationships with existing suppliers. In this context, the personal data of employees at our suppliers (e.g. account managers) is processed.



This processing takes place on the basis of Setle's legitimate interest. You can always object to this in accordance with the conditions described under 'right to object' in the chapter 'What are your rights and how can you exercise them'.

- **What personal data do we process?**
 - Identification and contact details
 - Other data as may come up during further contacts:
 - Occupation-related data
 - ...
- **How do we obtain this personal data?** Directly from you through relationship management
- **How long do we keep it?** Up to 7 years after the completion of a last assignment or contact
- **With whom can we share this personal data (other than affiliated and associated companies)?** Processors (such as, for example, our CRM platform) that we rely on for our relationship management
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.7. Chatbot

Consent - On our website you can ask questions to, and chat with, our chatbot. In this context, we process your personal data in order to make this communication possible.

This processing takes place on the basis of your consent. You have the option to withdraw your consent at any time, without this affecting the lawfulness of the data processing carried out up to the point of withdrawal. In practice, this means that your consent remains valid for all previous conversations, but you will no longer be able to have conversations with the chatbot.

- **What personal data do we process?**
 - Identification and contact details
 - Other data as may come up during the conversation
- **How do we obtain this personal data?** Directly from you, through the conversation you have with the chatbot
- **How long do we keep it?** Until you close the conversation, plus the archiving period applicable to related communications (such as e-mails)
- **With whom can we share this personal data (other than affiliated and associated companies)?** Processors (such as, for example, our hosting partner) that we rely on to keep the chatbot available
- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

3.8. Setle user account

Contractual agreement - When you sign up for Setle Web via our website, we process your personal data on the basis of the contractual agreement formed between you and us. This means that we need your data in order to be able to deliver, manage, and optimise the services you obtain through our website. Without this data, we cannot fulfil our obligations under the agreement, such as granting access to your account, providing renovation simulations, and providing customer service.

- **What personal data do we process?** Contact details
- **How do we obtain this personal data?** Directly from you through the sign-up process
- **How long do we keep it?** 2 years after the last activity
- **With whom can we share this personal data?** Setle's Partners



- **Does automated individual decision-making take place in connection with these activities?** No
- **Does a transfer outside the EEA take place in connection with these activities?** No

4. Sharing personal data with third parties

When you visit our website or use our services as a customer, we may rely on third parties in this context, such as partners, affiliated and associated companies, and suppliers to whom we pass on your personal data. These third parties help us to deliver, support, and develop our services and gain insight into their use, and provide services such as hosting, customer and technical support, marketing, analytics, content delivery, and/or the processing of online payments.

It is also possible that, in the context of a reorganisation, restructuring, merger, sale, or other transfer of business assets, we may also share data (including personal data) with third parties. We share the information you provide, information collected automatically, and information from others with these third parties to the extent necessary to enable them to provide their services or support. For each of the activities described above, we indicate which categories of third parties, other than affiliated and associated companies, we share your personal data with.

Furthermore, we may need to provide access to your data or pass on your data due to a legal obligation, to authorities, government institutions, or other third parties.

Finally, we may pass on your data if this should prove necessary in connection with your vital interests.

5. Transferring personal data outside the EEA

Setle aims to limit the transfer of personal data to recipients located outside the European Economic Area ("EEA") wherever possible.

Where a transfer of personal data outside the EEA is necessary, we will ensure that the transfer is carried out in compliance with the GDPR. Depending on the circumstances, this may be achieved by relying on an adequacy decision adopted by the European Commission or by implementing appropriate safeguards, such as the European Commission's Standard Contractual Clauses, together with any supplementary measures required to ensure an adequate level of protection.

For information on the specific international transfers that may apply to a particular processing activity, please refer to the section **"Why and how do we process your personal data?"**

6. How long do we keep your personal data?

We do not keep your personal data for longer than is strictly necessary to achieve the purposes for which the personal data was collected, or in accordance with the legal obligation imposed on us. For the specific retention period, please refer to the section **"Why and how do we process your personal data?"**.

7. Automated individual decision-making

European data protection legislation imposes certain conditions on organisations when they make decisions about individuals based solely on processing that is fully automated, including profiling, and when these decisions have legal effects or other significant effects. Setle does not engage in this type of decision-making.

8. What are your rights and how can you exercise them?

It is important to Setle that you always retain control over the processing of your personal data. Below you will find more information about the various rights you have and can invoke in relation to the processing of your personal data.



Depending on the processing and its legal basis, certain conditions or restrictions may apply to the exercise of the rights below.

To exercise the above rights, or for information about them, you can contact privacy@setle.app. We will then provide further information if certain modalities are attached to your request. Furthermore, we may request additional information to verify your identity, so that your personal data is not wrongly deleted or shared with someone who is not entitled to it. We will endeavour to respond without unreasonable delay, but in any event within one month of receipt of your request. If we cannot respond within one month and wish to extend this period, or if we will not act on the request, we will notify you accordingly.

8.1. Right of access

Where we process your personal data, you have the right to access your personal data, as well as certain additional information as described in this privacy statement. You have the right to receive from us a copy of the personal data we hold, provided this does not adversely affect the rights and freedoms of others. The first copy will be provided free of charge, but for repeat requests we reserve the right to charge a reasonable fee.

8.2. Right to rectification

If the personal data we hold about you is inaccurate or incomplete, you have the right to have this information corrected or, given the purposes of the processing, completed.

8.3. Right to restriction of processing

You have the right to have the processing of your personal data restricted. This means that the personal data may only be stored by us and used only for limited purposes. This right applies if any of the following situations occur:

- You dispute the accuracy of the personal data, for a period allowing us to verify its accuracy;
- The processing is unlawful, but you oppose the erasure of the personal data and request the restriction of its use instead;
- We no longer need your personal data for the processing purposes described above, but you need it for the establishment, exercise, or defence of legal claims; or,
- You have objected to processing and ask us to restrict the processing pending the answer to whether our interests override yours.

In addition to our right to store your personal data, we may still process it, but only:

- With your consent;
- For the establishment, exercise, or defence of legal claims;
- To protect the rights of another natural or legal person; or
- For reasons of public interest.

Before we lift the restriction on the processing of your personal data, you will be informed of this.

8.4. Right to data portability

If the processing of your personal data is based on your consent, and is carried out through automated processes, you have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format. You also have the right, where technically possible, to have your personal data transmitted directly by us to a third party. This right does not apply where this would adversely affect the rights and freedoms of others.

8.5. Right to object



You have the right to object, on grounds relating to your particular situation, to the processing of your personal data where such processing is based on the performance of a task carried out in the public interest or in the exercise of official authority, or on our legitimate interests or those of a third party.

If you exercise your right to object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or where the processing is necessary for the establishment, exercise, or defence of legal claims.

Where we process your personal data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing, you have the right to object at any time and free of charge. If you exercise this right, we will cease processing your personal data for direct marketing purposes.

8.6. Right to erasure (right to be forgotten)

You have the right to request that we erase your personal data. This means that the personal data must be deleted by us without undue delay. This right applies if any of the following situations occur:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You withdraw the consent on which the processing is based, and there is no other legal basis for the processing of your personal data;
- Your personal data has been processed unlawfully;
- Erasure of your personal data is necessary to comply with European or Belgian law;

If you ask us to erase your personal data, we will erase it unless one of the following situations (exceptions) applies:

- The processing is part of the exercise of the right to freedom of expression and information;
- Erasure does not apply for reasons of public interest in the area of public health;
- Erasure does not apply given the need for archiving in the public interest, or for statistical purposes;
- A legal obligation to retain the data applies; or,
- Erasure does not apply given the establishment, exercise, or defence of legal claims.

8.7. Right to withdraw your consent

Where you have given consent for certain processing of your personal data, you can withdraw that consent at any time. We try to make withdrawing consent as easy as possible, and as far as possible, just as easy as giving consent.

8.8. Right to object to the processing of your personal data in automated individual decision-making

When your personal data is used in connection with automated individual decision-making, and when these decisions have legal effects or other significant consequences, you can ask us to stop using your data. If you object to such processing, we will stop or restrict the processing unless there are compelling reasons to do so.

9. Who can I contact with further questions or complaints about privacy?

If, after reading this privacy statement, you have further questions or comments regarding the collection and processing of your personal data, you can always contact us at the following e-mail address: privacy@setle.app.

In addition, you have the right to submit any comments, remarks, or complaints to the supervisory authority responsible for data protection. You can do this in the EU Member



State where you reside, the place where you work, or the place where the alleged infringement took place. In Belgium, you can file a complaint with the Data Protection Authority:

Data Protection Authority

Drukpersstraat 35, 1000 Brussels
+32 (0)2 274 48 00

<https://www.dataprotectionauthority.be/citizen/actions/lodge-a-complaint>
www.dataprotectionauthority.be

Because we attach great importance to our relationship with you, we ask that you always contact us first, so that we can work out a solution to whatever is at the root of your complaint.

10. Changes to the privacy statement

Our organisation, and consequently this website, is continuously evolving. As a result, we may update this Privacy Statement from time to time to reflect changes to our services, the way we process personal data, or applicable legal and regulatory requirements.

Where we introduce new processing activities or make material changes to this Privacy Statement, we will inform you in an appropriate manner. Where required by applicable data protection law, we will also obtain your consent before carrying out such processing.

