

Introduction

Setle BV attaches importance to the protection of your personal data. Therefore, when processing your personal data, we always comply with applicable legislation, more specifically the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("General Data Protection Regulation, AVG" or "General Data Protection Regulation, GDPR") (hereinafter referred to as "the privacy legislation").

In this privacy statement, we explain what personal data we collect and how we process it. By communicating your personal data to us (via our website, via our mobile app, via our platform or otherwise), you agree to the provisions of the privacy statement below. If you provide us with someone else's personal data, you must have previously discussed the content of our privacy statement with that person and obtained their consent.

We invite you to read this privacy statement carefully, together with our terms of use and/or any other terms that may apply to our services.

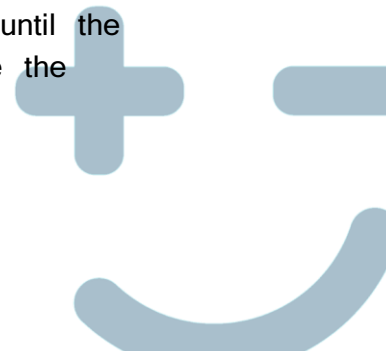
Last updated on 14/02/2024.

Owner and data controller

Setle BV
Ambachtsweg 14
3890 Gingelom
RPR Antwerpen, department Hasselt
BE 0666.412.269
privacy@setle.app

Mode and location of data processing

Within the Setle platforms and our website, we collect data from our users and partners. We keep this data for up to 2 years after the last simulation was carried out. We do this because lead times of a renovation can vary or change and the account must be guaranteed to remain available until the renovation is completed. In addition, we want to be able to serve the



Consumer well if, for example, there are still questions about the advice we have provided.

For each type of processing, we indicate what data we obtain, for what purpose we process it and for how long it is kept. If there are any questions, we can be contacted. Contact details can be found in this privacy statement.

We process personal data of:

- Users
- Partners, with whom we have or intend to enter into a business relationship
- Installers, with whom we have or wish to enter into a business relationship

Location

When you interact with our services, your data, including personal information, may be stored in Digital Ocean's cloud data centre. They comply with all regulations regarding data privacy and security.

Depending on Users' location, the transfer of personal data may involve transferring Users' Data to a country other than their own. For more information on the processing location of such transferred Data, Users may refer to the article detailing the processing of Personal Data.

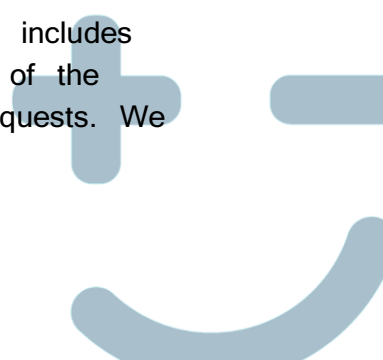
Users are also entitled to information about the legal basis of the transfer of Data to a country outside the European Union or to an international organisation under public international law or established by two or more countries, such as the UN, and about the security measures taken by Setle to protect their Data.

If such a transfer occurs, Users can find out more by consulting the relevant articles in this document or by inquiring with Setle using the information in the contact section.

Types of collected data

Account creation and management

Our platform allows consumers to create an account. This account includes information about the services (provided). For example, the results of the renovation can be found and/or information about any quotations/requests. We



do this on the legal basis of contract performance. We process the following data for this purpose:

- Name
- E-mail address
- Login data
- Telephone number (optional)

Simulation renovation

To do a simulation of a renovation, we need various data about the user and the house. We make a calculation of the estimated renovation cost and the indicative EPC label after renovation. We also indicate which subsidies you may be eligible for. We do this on the legal basis of contract performance.

For the above, depending on the precise component, we use the following data:

- Name
- E-mail address
- Telephone number
- Information about the property (incl. address details, year of construction, asking price, area, layout, any systems in place)
- Income (optional, only for subsidies)
- Family situation (optional, only for subsidies)

Reporting & Process optimisation

Data can be used internally to:

- Prepare management reports
- Evaluate and optimise processes
- Gain insights into (the performance of) the organisation

Sharing these reports (if necessary) with the shareholder and partners. We do this based on the legal ground of justified interest.

These reports are compiled and aggregated in such a way that individual information is never unnecessarily disclosed to recipients.

Services towards our partners



We work together with various partners. In this context, we need various data to carry out this cooperation within the framework of the execution of the agreement.

For this purpose, we process the following data:

- Company name
- Business address
- Contact name
- Contact details (e-mail address and telephone number)

Any other information you share with us

We keep this data for the duration of the agreed contract. We keep some data for longer if we are legally obliged to do so (e.g. because of the 7-year tax retention obligation).

Cookies

On our website and platforms, we use cookies from ourselves and from third parties. Cookies are information files that can be automatically stored on or read from the visitor's device (such as PC, tablet or smartphone) when visiting a website. This is done via the web browser on the device.

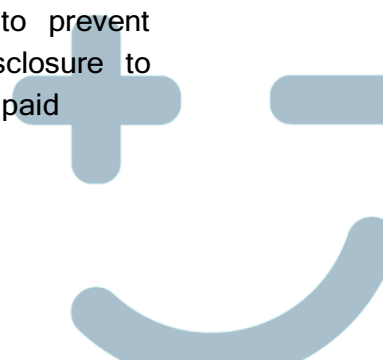
When you visit our website for the first time, we display a message explaining cookies. Necessary cookies will always be placed to ensure that our website functions properly - think about displaying our chat widget.

We inform you about the use of cookies in our cookie statement.

To whom will your personal data be transferred?

Your personal data may be transferred to third parties in the following cases:

- To the service providers we rely on to perform certain services on our behalf and who process personal data in the process (e.g. e-mail marketing service provider, etc.).
- To other companies in our corporate group for the same purposes as those stated in this privacy statement.
- When (i) certain legislation, legal proceedings or a government agency require us to do so, (ii) when there is a legitimate interest to do so or when the disclosure of this data is necessary and appropriate to prevent any financial or other damage or to protect our rights (e.g. disclosure to our credit insurer with whom we take out insurance against unpaid



invoices or to legal service providers) , or (iii) in connection with an investigation into (suspected) fraudulent or illegal activities.

- When you use the platform through one of our Partners, Setle sends information relating to planned renovations and premiums to the Partner. The Partner processes this data for commercial purposes, for example to make financing proposals for renovation plans. Setle invokes its legitimate interest in this case.

Rights of data subjects

Users may exercise certain rights in relation to their Data processed by Setle.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw their consent if they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. More information can be found in the specific article below.
- Accessing their Data. Users have the right to know whether Setle carries out Data processing, to know about certain aspects of the processing and to obtain a copy of the Data being processed.
- To verify and request rectification. Users have the right to check the accuracy of their Data and request its updating or rectification.
- To restrict the processing of their Data. Users have the right to restrict the processing of their Data under certain circumstances.
- To have their Personal Data erased or otherwise deleted. Users have the right to have their Data erased under certain circumstances.
- To file a claim. Users have the right to file a claim with their competent data protection authority.

More information on the right to object to processing

Where Personal Data are processed for the purpose of pursuing Setle's legitimate interests, the User may object to such processing by providing a reason related to his or her specific situation. Setle will then cease processing the personal data unless it can invoke compelling legitimate grounds or establish a connection with the establishment, exercise or substantiation of a legal claim.



Users should be aware, however, that if their Personal Data is processed for direct marketing purposes, they may object to such processing at any time without giving any reasons.

How to exercise these rights

Requests to exercise data subjects' rights may be addressed to Setle using the following contact details:

privacy@setle.app

Setle BV

Corda Campus

Kempische Steenweg 303/200

3500 Hasselt

These requests are free of charge and will be dealt with by Setle as soon as possible and always within one month. When we receive a request, we may ask for identification. For this purpose, we request data to ensure that it is the person to whom the personal data belongs.

Moreover, you can always contact the Data Protection Authority, Drukpersstraat 35, 1000 Brussels, by e-mail addressed to or [via the DPA website](#).

Adjustments to the privacy statement

As we constantly seek to improve our website, the Setle Platform and our services, we occasionally update this privacy notice to ensure that it is in line with legislation, our business needs and the needs of our users, visitors and service providers.

We always publish updated versions of this privacy notice on the website and the Setle Platform. These new versions will be time-stamped so that you can check which version of the privacy notice is the most recent. Important changes will always be communicated to you.

