

INTRODUCTION

Please find below the privacy policy that applies to the information we collect and use about you when you access or use Mentority website, mobile application or any other online or mobile service. We refer to these products and services collectively as the "Services".

The **www.mentority.app** website and its Applications and Services respect your privacy and are committed to protecting your personal information. The purpose of this Privacy Policy is to inform customers who visit **www.mentority.app** how and why your personal information is collected.

Scope of the charter:

- The Charter is intended to apply to the following media:
- Any website operated by Mentority (for any website, the "Site").

Our privacy policy also aims to inform you of your rights in this area and how the law protects you.

Please also use the glossary to understand the meaning of certain terms used in this privacy policy.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW WE COLLECT YOUR PERSONAL DATA

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURE OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR RIGHTS

10. GLOSSARY

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of our privacy policy

The purpose of this privacy policy is to inform you about how the **www.mentority.app** website collects and processes your personal data while using this website, including the data you provide to us when you subscribe to our newsletter or purchase any of our services.

The **www.mentority.app** website is not intended for children, and we therefore do not knowingly collect personal data from them.

It is important that you read this privacy policy in full and any other privacy notices or fair processing notices that we may provide on occasions when we collect or process personal data about you, so that you know how and why we use your data.

DATA CONTROLLER

The **www.mentority.app** website is the controller and responsible for your personal data (collectively referred to as "MENTORITY" in this privacy policy).

To enable us to best safeguard your rights in relation to the personal data we collect, we have appointed a Data Protection Officer (DPO) to oversee matters relating to the application of the law and our privacy policy.

The Data Protection Officer is responsible for answering any questions you may have about our privacy policy, including any requests to exercise your legal rights.

DPO DETAILS

Please find below the contact details of our Data Protection Officer:

- Full name of legal entity: VLCN Holdings
- Name or title of DPO: Data Protection Officer
- Email address: **contact@mentority.app**

OBLIGATION TO INFORM US OF CHANGES

Data protection law in Belgium was amended on 25 May 2018 with the entry into force of the General Data Protection Regulation (the "GDPR").

As part of the application of the rules relating to the application of the GDPR, it is important that the personal data we hold about you is accurate and up to date. It is therefore essential that you inform us of any changes to your personal data.

THIRD PARTY WEBSITES

Our www.mentority.app website may include links to third party websites, plug-ins, and applications. By clicking on these links or activating these connections, it is possible that third parties may collect or share data about you. We do not control these third-party websites and cannot be held responsible for their use. You are therefore advised to read the privacy policy of each website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about a person from which that person can be identified. This does not include data from which the identity has been removed (anonymous data).

We may collect, use, store and transfer different types of personal data about you, which we have grouped together:

- Identity data includes first name, last name.
- Contact data includes e-mail address.
- Contact data includes your telephone number.

- Profile data includes your name, comments, and survey responses.

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregate data may be derived from your personal data but is not considered personal data insofar as such data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect aggregated data with your personal data to identify you directly or indirectly, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal data about you (this includes details of your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information and genetic and biometric data).

We also do not collect information about criminal convictions and offences.

REFUSAL TO PROVIDE YOUR PERSONAL DATA

If we need to collect personal data in accordance with the law or under the terms of a contract we have with you and you do not provide this data on request, we may not be able to perform the contract. In this case, we may no longer be able to provide you with the selected product or service, but we will inform you if this is the case at that time.

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We use several different methods to collect data about you:

Direct interaction. You may provide us with your identity, contact details and financial information by completing forms or by contacting us by email or otherwise. This includes personal data you provide when you:

Subscribe to one of our services.

- Complete a contact form on our website.

- Automated technologies or interactions. When you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this data using cookies, server logs and similar technologies.

- Third parties or publicly available sources. We may receive personal data about you from various third parties, as indicated below:

- Usage data includes information about how you use our website, products and services.

- Marketing and communications data includes your marketing preferences with us and our third parties.

Technical data from the following parties:

- (a) Analytics providers such as Google based outside the EU.

- Contact, financial and transaction data from technical, payment and delivery service providers based outside the EU.
- Identity and contact data from publicly available sources such as the Companies Register and publicly available financial information.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data in accordance with the law. We will use your personal data in the following circumstances:

When we need to perform the contract between us, or when we are about to enter or conclude the contract with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Or we need to comply with a legal or regulatory obligation.

As a rule, we do not consider consent to be a legal basis for processing your personal data, except in relation to the sending of direct marketing communications by third parties, by e-mail or SMS.

You have the right at any time to withdraw your consent to marketing operations whose purpose is to collect your personal data.

To do so, simply send us a request for withdrawal to the following e-mail address:

contact@menturity.app

PURPOSE OF PROCESSING YOUR PERSONAL DATA

We collect your name, address, and other contact information in order to process your data in the most efficient way.

Your name, address and contact details will be passed on to our carefully selected service providers to provide you with the best possible service.

PROMOTIONAL OFFERS

We may also use your identity, contact, technical, usage and profile data to offer you new or related services that may be of interest to you. This is how we decide which services and offers may be relevant to you (we call this marketing).

As part of the application of our privacy policy, you may receive marketing communications from us if you have previously requested information from us or purchased products and services from us at www.menturity.app.

Marketing communications can only be sent if you have accepted and validated the principle. We cannot send you marketing communications if you have expressed your wish not to receive them.

NEWSLETTER

We may also use your identity, contact, technical, usage and profile data to send you a newsletter informing you of news and events relating to the www.menturity.app website.

REQUEST

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at the following address: **contact@menturity.app**

Where you opt out of receiving such marketing messages, this does not apply to personal data provided to us because of a product / service purchase, warranty registration, product / service experience or other transaction.

COOKIES

You can configure your browser to refuse all or some of the browser's cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this site may become inaccessible or may not function properly.

For more information on the cookies we use, please consult our cookies policy.

CHANGE OF PURPOSE OF PROCESSING

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will inform you and explain the legal basis for doing so.

Please note that we may process your personal data without your knowledge or consent, in accordance with the above rules, where this is required or permitted by law.

5. DISCLOSURE OF YOUR PERSONAL DATA

We may need to share your personal data with the third parties listed below:

- External third parties as defined in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire or merge with other businesses. If there is a change in our business, the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not authorize our third party service providers to use your personal data for their own purposes and we authorize them to process your personal data only for specific purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized manner, modified or disclosed. In addition, we restrict access to your personal data to our employees, subcontractors and any other third parties in the context of their duties and in accordance with the law.

They will only be able to process your personal data on our instructions and are subject to a duty of confidentiality involving the non-disclosure of your personal data.

To guarantee that your personal data will not be disclosed to unauthorized third parties, we have put in place procedures to deal with any breach of your personal data.

In the event of a breach of your personal data in our possession, we may be required to notify you in accordance with the relevant legal obligations.

8. RETENTION OF DATA

RETENTION PERIOD FOR PERSONAL DATA

We will only retain your personal data for as long as is necessary to fulfil the purposes for which we collected it, including to meet legal, accounting or reporting requirements.

In determining the appropriate retention period for personal data, we take into account the amount, nature and sensitivity of the personal data, the potential risk of harm arising from the unauthorized use or disclosure of your personal data, and the purposes for which we process your personal data.

We may achieve these purposes by other means, and applicable legal requirements.

By law, we must retain basic information about our customers (including contact and identity details) for six years after they cease to be customers.

In some cases, you may ask us to delete your data: see [Request for deletion] below for more information.

In certain circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws relating to your personal data.

- Request access to your personal data;
- Request correction of your personal data;
- Request the deletion of your personal data;
- Object to the processing of your personal data;
- Request restriction of the processing of your personal data;
- Request the transfer of your personal data;
- Right to withdraw consent.

If you wish to exercise any of the above rights, please contact us.

FREE ACCESS TO YOUR DATA

You will not be charged a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive.

We may also refuse to respond to your request if it is manifestly unfounded.

REQUEST FOR SPECIFIC INFORMATION

We may need to ask you for specific information to help us confirm your identity and secure your rights to access your personal data (or to exercise one of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone who does not have a right to receive it. We may also contact you to request further information about your request to speed up our response.

RESPONSE TIME

We try to respond to all legitimate requests within one month. Sometimes it may take longer than a month if your request is particularly complex or if you have made several requests. In this case, we will inform you and keep you informed.

10. GLOSSARY

LEGAL BASIS

Legitimate interest means our business interest in conducting and managing our business to enable us to offer you the best service / product and the best and safest experience. We ensure that we consider and balance any potential impact on you (positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are outweighed by the impact on you (unless we have your consent or are otherwise required or permitted by law).

You can get more information about how we assess our legitimate interests against any potential impact on you in relation to specific activities by contacting us.

Contract performance means processing your data where this is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering such a contract.

Compliance with a legal or regulatory obligation means processing your personal data where this is necessary to comply with a legal or regulatory obligation to which we are subject.

EXTERNAL THIRD PARTIES

Service providers acting as subcontractors based in Belgium and providing IT and system administration services.

Professional advisers acting as sub-contractors or joint controllers, including lawyers, bankers, auditors, and insurers based in Belgium, who provide advisory, banking, legal, insurance and accounting services.

Tax authorities, regulators and other authorities acting as controllers based in Belgium, who require the declaration of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This allows you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

Request a correction to the personal data we hold about you. This allows you to correct any incomplete or inaccurate data we hold about you, although we must check the accuracy of the new data you provide.

Request the deletion of your personal data. This allows you to ask us to delete personal data where we have no good reason to continue processing it. You also have the right to ask us to delete your personal data if you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to delete your personal data to comply with the law.

Please note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, where appropriate, at the time of your request.

Purpose of processing your personal data. In the context of the application of our privacy policy, you have the right to object to the processing of your data on the grounds that you have a legitimate interest (or those of a third party) and that said data processing has a real impact on the application of your rights and fundamental freedoms.

You also have the right to object to the processing of your personal data when it is used for direct marketing purposes. However, we may process your data for marketing purposes where we can demonstrate compelling legitimate grounds.

Request to restrict the processing of your personal data. This allows you to ask us to suspend the processing of your personal data in the following scenarios:

1. If you want us to establish the accuracy of the data;
2. Where our use of your data is unlawful, but you do not want us to delete it;
3. Where you need us to retain all your data even if we are no longer legally obliged to do so in the event that you need it to establish, exercise or defend your interests in legal proceedings; or

(d) You have asked us to stop using your data, but we cannot always comply with your request where there are compelling reasons to do so.

Request the transfer of your personal data to you or to a third party. As part of the application of our confidentiality policy, you may ask us to transfer your data to you or to a third party that you have chosen.

It will therefore be our responsibility to provide you with your personal data in a structured, commonly used, and machine-readable format (this possibility is offered to you on condition that the information initially provided was in such a format).

Withdrawal of consent at any time. As part of the application of our privacy policy, you may withdraw your consent to our processing of your personal data.

However, this in no way affects the lawfulness of the processing carried out prior to the withdrawal of your consent.

Without your consent to the processing of your data, we will no longer be able to provide you with some of our services. However, you will be informed of this at the time your consent is withdrawn.