Privacy Policy

Version 2.5 · October 2026

This Privacy Policy applies to the Personal Data collected and processed by FlatTurtle BV, with registered office at Ikaroslaan 1, 1930 Zaventem, Belgium and with enterprise number: 0843.961.762 (hereinafter **"FlatTurtle"**, **"we"** or **"us"**).

FlatTurtle deems the protection of privacy of the utmost importance. FlatTurtle wishes to inform you about the way it Processes your Personal Data, in accordance with the applicable data protection legislation and more specifically with the General Data Protection Regulation ("**GDPR**") and its relevant national implementing legislation. All capitalized terms that are not defined in this Privacy Policy shall have the meanings as ascribed to them in the GDPR.

This Privacy Policy describes your rights for you to make informed decisions and to exercise your rights when necessary. Please read this Privacy Policy very carefully.

This Privacy Policy must be read together with our cookie policy, which can be found here.

FlatTurtle may amend this Privacy Policy from time to time. The date of the most recent version is shown in the top right-hand corner. Any significant changes to this Privacy Policy will be communicated to you in an appropriate manner. Please review this Privacy Policy periodically to stay informed of changes that may affect you.

1. Who Processes your Personal Data and how can you contact us?

FlatTurtle is responsible for the Processing of your Personal Data and shall act as a Controller in the context of the Processing activities described in this Privacy Policy.

Please note that we often act as Processor of our clients (e.g. when providing meeting room booking, Wi-Fi management or building network monitoring services). Please contact our clients directly if you would like to have more information regarding these Processing activities.

If you have any questions regarding our data processing activities, you can contact us by using the following e-mail address: legal@flatturtle.com.

2. What Personal Data are collected and processed and for which Purposes?

FlatTurtle processes the following Personal Data for the following purposes:

Purpose	Personal Data	Legal basis	Retention period
Sending out a newsletter and other e-mails	• First and last name • Email address	Consent	Until the person unsubscribes.
Contacting FlatTurtle via the contact form	• First and last name • Email address • Any other personal data communicated in your message	Consent	*We will only retain your Personal Data as long as necessary for the Purposes.*

Purpose	Personal Data	Legal basis	Retention period
Customer relationship management	• First and last name • Email address • Phone number • Organisation • Payment information • Correspondence and support requests	Legitimate interest Performance of a contract (as applicable)	*We will only retain your Personal Data as long as necessary for the Purposes.*
Invoicing and accounting	• First and last name • Organisation, address and VAT number • Email address • Invoices and payment records (payer name, bank account number)	Legal obligation (Belgian accounting and tax law)	*10 years, as required by Belgian tax law.*
Security and operation of our websites, applications and screens (logs and error reports)	• IP address • Browser and device information • Pages and resources requested, with date and time • Account details (e.g. email address) included in error reports	Legitimate interest: keeping our services secure, available and working correctly	*Logs: at most 15 days. Error reports: at most 360 days.*
Website statistics (our own analytics, without cookies)	• Pages visited and referring website • Browser, operating system, device type and screen size • Language and approximate location (country, region, city), derived from the IP address, which is not stored	Legitimate interest: understanding how our websites are used, to improve them	*Kept without a fixed end date.*
Measuring how busy the areas around our screens are, by counting nearby Bluetooth devices, and keeping an inventory of Bluetooth equipment in the building (e.g. beacons and sensors)	• Bluetooth addresses of nearby devices. Phones, watches and similar devices use addresses that change regularly; these are kept only in the screen's memory, for at most 5 minutes, to tell new arrivals from devices already present, and are never stored or sent • Per-minute counts of nearby devices (numbers only) • For devices with a fixed address (e.g. beacons, sensors, printers, locks): address, advertised name, manufacturer and sensor readings	Legitimate interest: measuring the use of the spaces where our screens are installed, without identifying anyone	*Changing addresses: at most 5 minutes, in memory only. Counts and equipment inventory: 2 years.*

Where Personal Data of a third party are disclosed to us, the person communicating the Personal Data guarantees that he or she has informed that third party and that he or she has received all necessary consents to communicate the third party's Personal Data to FlatTurtle.

Where the Processing is based on your consent, you have the right to withdraw your consent at any time. Please note that withdrawal of consent does not affect the Processing of Personal Data prior to such withdrawal.

You have the right at any time to object to the Processing of your Personal Data for direct marketing purposes, by sending an email to legal@flatturtle.com.

3. Who do we share your Personal Data with?

FlatTurtle may sometimes need to share Personal Data with third parties. Your Personal Data may be shared or transferred to the following service providers:

Service providers	Processing activities	Type of personal data	Location of processing	More information
Mailchimp	Mailing lists	Names and email addresses	US	mailchimp.com/legal/privacy/
Leaseweb	Server hosting	IP addresses, logs and error reports	EU	www.leaseweb.com/en/about-us/legal/personal-data-protection-acts
Mailgun	Sending automated emails from our applications (booking confirmations and reminders, monitoring reports, invoices)	Names, email addresses, email content and delivery events; for some emails, opens and clicks (IP address, device and browser)	EU	www.mailgun.com/gdpr
Google Workspace	E-mail hosting	Emails and other PII	US	support.google.com/a/answer/2888485?hl=en
GCP and Google APIs	APIs & web services	IP addresses	EU	support.google.com/maps/answer/10400210?hl=en
Cloudflare	DNS, network security, content delivery and hosting of our websites and applications, including their databases and file storage	IP addresses and request data; data stored in our applications (names, email addresses, bookings, support correspondence)	Global, incl. US	www.cloudflare.com/privacypolicy/
Moneybird	Invoicing and bookkeeping	Contact details (name, organisation, address, email, VAT number), invoices and payment records (payer name, bank account number)	EU	www.moneybird.nl/privacy/
Better Stack	Log management and uptime monitoring	IP addresses and log data from our servers, applications and screens	EU	betterstack.com/privacy
GitLab	Source code hosting and issue tracking	Names, email addresses and other details mentioned in support and work items	US	about.gitlab.com/privacy/
Anthropic	AI assistant (Claude) that helps us handle emails, support requests and operations	Emails and other content processed with the assistant	US	www.anthropic.com/legal/privacy
Superhuman	E-mail client	Emails and contact details	US	superhuman.com/legal/privacy-policy
Teltonika (RMS)	Remote management of our 4G routers	Router and SIM card data, IP addresses	EU	www.teltonika-iot-group.com/policies-certificates/privacy-policy

This listing may evolve and shall be updated from time to time.

Processors of FlatTurtle always act under the responsibility of FlatTurtle in accordance with a Data Processing Agreement that meets the requirements of the GDPR. We guarantee that all external parties have been selected with due care.

If you are directed to another application, platform or website through our website, other terms and conditions and other privacy and cookie policies may apply. You should take into account any such terms and conditions and privacy and cookie policies of such applications, platforms and websites. We encourage you to read these terms and conditions and privacy and cookie policies of the other applications, platforms and websites you visit.

4. Transfer of Personal Data outside the European Economic Area (EEA)

The European Economic Area ("EEA") includes the countries of the European Union, as well as Norway, Liechtenstein and Iceland.

Some of our third-party service providers may Process your Personal Data in countries outside the EEA. These transfers outside the EEA will only occur in accordance with applicable law (such as chapter V of the GDPR) (e.g. model contract clauses, binding corporate rules, code of conduct, adequacy decisions, etc.)

5. How are my Personal Data safeguarded?

FlatTurtle has developed appropriate technical and organizational measures, safeguards and assurances to Process your Personal Data in accordance with applicable Belgian and European regulations, in particular to protect your Personal Data against loss, misuse, or unauthorized alteration or destruction.

The measures taken by FlatTurtle, include:

- Restricting the access to systems containing Personal Data;
- Storing only the Personal Data strictly necessary to make the systems function (e.g., email addresses, name, hashed passwords).

FlatTurtle makes thus all reasonable and appropriate efforts to protect the confidentiality of your Personal Data. Within FlatTurtle access to your Personal Data will only be granted on a need-to-know basis.

Despite the above measures taken by FlatTurtle, you should be aware that there are always risks associated with sending Personal Data over the Internet. The security and protection of your Personal Data can never be fully guaranteed.

6. What rights do I have?

If and in as far as provided for in the applicable Belgian and European legislation, you have the right:

a) to receive confirmation as to whether FlatTurtle Processes your Personal Data and, where this is the case, to access the Personal Data that FlatTurtle Processes;

b) to corrections by FlatTurtle, without undue delay, of any inaccurate or incomplete Personal Data;

c) to have your Personal Data deleted by FlatTurtle;

d) to obtain your Personal Data and to transfer them to another controller or processor;

e) to obtain a limitation of the Processing of your Personal Data from FlatTurtle, to the extent possible subject to applicable Belgian and European regulations;

f) to receive your Personal Data in a structured, common and machine-readable format;

g) to object to the Processing of your Personal Data and the use of your Personal Data for direct marketing purposes.

You may exercise these rights by contacting us via legal@flatturtle.com.

FlatTurtle does not make decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you.

If and to the extent provided for in the applicable Belgian and European legislation, you have the right to file a complaint with the competent supervisory authority should the Processing of your Personal Data violate the applicable regulations. In Belgium, this is the Data Protection Authority ("*Gegevensbeschermingsautoriteit*"):

> Drukpersstraat 35, 1000 Brussel
> +32 (0)2 274 48 00 / +32 (0)2 274 48 35
> contact@apd-gba.be
> https://www.dataprotectionauthority.be

7. Disclosure required by law

You acknowledge that we may disclose your Personal Data if this is required by law, or if FlatTurtle determines in good faith that such disclosure is required in order:

a) to comply with any pending judicial inquiry, judicial order or litigation;

b) to respond to claims against FlatTurtle regarding Personal Data that violate any rights of third parties;

c) to safeguard the rights, property and safety of FlatTurtle, its employees, users, and the general public.

FlatTurtle may disclose your Personal Data to competent police or judicial authorities or other official government authorities if FlatTurtle deems this useful or necessary, in its sole discretion, for the investigation of fraud, intellectual property infringement or any other harmful activity, or if FlatTurtle reasonably suspects that such activity may expose FlatTurtle or you to any liability.

8. Liability

If FlatTurtle has legitimately transmitted your Personal Data to a third party (not being a Processor or subprocessor), FlatTurtle shall not be liable for any unlawful Processing or unlawful use by that third party.

9. Applicable law and competence clause

This Privacy Policy shall be governed, interpreted, and implemented in accordance with Belgian law, which applies exclusively in the event of any dispute.

The Belgian courts and more specifically, the Dutch-speaking courts of Brussels are exclusively competent to decide on any dispute that may arise from the interpretation or implementation of this Privacy Policy, without prejudice to the consumer's right to present a dispute before the competent court on the basis of a mandatory statutory provision, including your right under Article 79(2) GDPR to bring proceedings before the courts of the EU Member State where you habitually reside.