

# Privacy Policy – Kadolog

(last edited: January 2024)

The new European regulation regarding the protection of personal data (GDPR) has come into effect. In order to continue using our services and all of Kadolog's functions, you can approve our privacy policy here, where we try to give you as much information as possible about the protection of your data.

Our mission is to offer you a platform where you can create gift lists which your friends and family can use to spoil you, or where you can create a 'kitty'. We offer various tools for you to use to achieve this. We also offer personalised content you may be interested in, based on the information we collect.

We've compiled this policy to help you understand what information we collect, how we use it, and what choices you have about it.

## 1.1. Who does the processing?

KADOLOG bvba is responsible for processing your personal data. It has its registered office at 1410 Waterloo, 126 Rue Mattot and is registered at the CBE under the no. 0841.031.867.

## 1.2. We collect information in various ways:

### 1. When you give it to use or give us permission to obtain it from a third party

#### *For the list makers:*

When you open an account at Kadolog, identify yourself on Kadolog, or use the services, you give us certain information voluntarily. This includes your name and surname, your partner's name and surname, language preferences, a profile photo, welcoming texts and the pictures on your list. If you subscribe to the 'Premium' option, you also give us your postal address. If you want to receive monetary transfers from your friends and family, you also have to give us your IBAN and BIC. If you want to receive online payments, you have to give us your date of birth, nationality and limited mandatory documents: means of identification, proof of residence, and proof that the IBAN account belongs to you (KYC: Know Your Customer'). This is in agreement with the applicable European legislation concerning anti-fraud, money-laundering, and the financing of terrorism (anti-money laundering directive 2015/849 of 20 May 2015). If you want your gifts delivered at home, you have to give us your delivery address.

When you subscribe to the 'Premium' or 'Extra' option, we have (via our payments partner, HiPay) access to your payment details (the type of card, e.g. Mastercard or Bancontact) and certain personal details (card holder's name and surname, IP-address, and e-mail address).

If you link your Facebook account to Kadolog (via 'Facebook Connect'), we also get data from those accounts. What data we get from these services depends on your settings and the privacy policies of the third parties in question. So, be sure to check these. Kadolog only uses Facebook Connect to make registration easier; we also use no other data besides the name and surname and e-mail address you used on Facebook.

#### *For the givers:*

When you offer a gift or donation on Kadolog, you give us certain information voluntarily. This includes your name, surname, language preference, e-mail and postal addresses, and your message to the list maker. If you pay online, you share your date of birth and IP-address.

When you pay directly on Kadolog, using a card, we have access to your payment details (the type of card, e.g. Visa, MasterCard, or Bancontact) via our payments partner, LemonWay and to certain personal data (cardholder's name and surname and IP-address).

- **2. We also get technical information when you use Kadolog**

Whenever you use any website, mobile app, or other internet service, certain information gets created and saved automatically. The same is true for when you use Kadolog. Here are some of the types of information we collect:

- **Log data.** When you use Kadolog, our servers record information ('log data'), including information your browser automatically sends when you visit a website, or that your mobile app automatically sends when you use it. This log data includes your IP-address, type of browser, browser settings, the date and time of your request, how you used Kadolog, cookie data, and device details.
- **Cookies.** We also use 'cookies' (small text files sent by your computer every time you visit our website, unique to your Kadolog account or browser) or similar technologies which capture log data. When we use cookies or similar technologies, we use session cookies (that last until you close your browser) or persistent cookies (that last until you, or your browser, delete them). For example, we use cookies to store your language preferences or other settings, so you don't have to set them up each time you visit Kadolog. Some of the cookies we use are linked to your Kadolog account and contain your personal data (such as the e-mail address you gave us); others are not.
- **Device information.** In addition to log data, we also collect data about the device you use Kadolog on, including the type of device, operating system, settings, unique device numbers, and information about crashes, which we use to better understand why something's not working. The type of data we collect depends on whether you use a PC or Mac, or an iPhone or Android device. To get more information about what information your device manufacturer or software provider makes available to use, please check their policies.

### 1.3. What kinds of data do we collect and process?

To create and use lists on our website, and in the general use of our services by list makers as well as the givers, different kinds of data need to be shared

- Identification data (name and surname, gender, age),
- Contact information (home and work address, telephone number, e-mail address, etc.)
- Financial data (bank details, VAT number, etc.)

Included in the personal data you give us, there is also personal data of third parties (spouse, partner, friends, child(ren), family member(s), etc.)

### 1.4. What do we do with the info we collect?

For the list makers:

- We use the collected data to offer our services to you. To be able to do this, we need to use your information to:
  - Identify you when you use Kadolog and to process your transactions
  - Respond to your questions and comments.
  - Help your friends and contacts find you on Kadolog based on your name and surname, if you allowed this in your settings (in the 'list settings' menu, and then the 'Privacy' tab).
  - Allow us to post your Kadolog discount card to you.
  - Allow us to share your account number with friends and family so they can do transfers in the way you chose in your list settings.
  - Allow us to give your date of birth, IP-address, and proof that the IBAN account belongs to you, to our payments partner (Lemon Way), so you can get online payments.
  - Make sure you can receive online payments of more than 2,500 euros. Our banking partner has to ask for your relevant documentation (means of identity, IBAN proof, and proof of residence)
  - Recommend products or categories you'd like according to your list on Kadolog. If, for example, you have a baby registry, we can recommend baby products we think you might be interested in or even ads that have to do with childcare.
  - Give tips about creating your lists: for example, the must-have items for your baby registry.
  - Conduct analytics on who's using Kadolog and what they're doing on the website. For example, by logging how often people use two different versions of a feature on Kadolog, we can understand which is better.
  - Conduct analytics on, and observe, the website's ergonomics and so, offer new features and improve your surfing experience.
  - Send e-mail messages (e.g. when you receive a gift or when you're at a certain gift quota) and information about Kadolog or our business partners (e.g. new partners for your discount card, products that fit in with the theme of your list, etc.) to you.
  - Send updates (new features or settings updates)
  - Help apply the law and keep Kadolog safe. We may be asked for account information from official authorities such as the police or courts.

So, we have a legitimate interest to use your personal data in these ways. It is also fundamental to the nature of the service we provide. In short, we need to do these things in order to make the service relevant, interesting, and personal to you like we promised, and it's in both our interests to do them.

We also have a legitimate interest to improve Kadolog, maintain our relationship with you, and protect our users. We both benefit when we use your information.

We have a legitimate interest to deliver ads that are relevant, interesting, and personal to you in order to generate profit (providing this service is expensive). To further these interests, we use the information we collect to decide which ads we let you see. If you have a baby register, for example, we can suggest baby goods. We customise the ad content we show by identifying your interests based on your onsite activities.

### For the givers:

We use the collected information to offer our services to you. In order to do this, we must use your data to:

- Identify when you use Kadolog and to process your transactions.
- Respond to your questions and comments.
- Let the people you have offered a gift to 1) know which gift on their list you have chosen and 2) send you their thank-you note via e-mail or post.
- Inform you whether a list's online payment has been successfully processed.
- Allow us to share your date of birth and IP-address with our payments partner (Lemon Way), so you can pay online on Kadolog.
- Conduct analytics on who's using Kadolog and what they're doing on the website. For example, by logging how often people use two different versions of a feature on Kadolog, we can understand which is better.
- Conduct analytics on, and observe, the website's ergonomics and so, offer new features and improve your surfing experience.
- Send e-mail messages (e.g. confirmation mail of a gift reservation, payment reminders) to you.
- Help apply the law and keep Kadolog safe. We may be asked for account information from official authorities such as the police or courts.

In general, we also rely on your permission where we use cookies to:

- Identify you across different browser sessions. This means if you log into Kadolog from your mobile (or another device), we'll remember that you're you and you won't need to enter your login details each time you visit Kadolog.
- Make sure the 'magic button' works right (the button you use to add items/gifts to your list from any shopping site).

In short, the cookies we use on our website can be classified as:

#### ➤ Essential cookies

You need these cookies if you want to visit our website and use certain parts of it. For example, you can surf between various sections of the website, or fill in forms. If you delete these cookies in your browser, some parts of the website won't work properly.

#### ➤ Technical and functional cookies are used to:

- make sure it's easy to use the website, and that it always works.
- customise your user experience by saving your preferences (preferred language etc. )
- avoid you having to repeat your choices each time you visit the site.
- collect the data you provide via the online forms.
- compile statistics.
- know how the site is used and performs and improve how it works by conducting analytics on the number of visitors to the information pages, and doing a follow-up of the opening percentages, the clicks, and the rebound percentages at an individual level.
- conduct analytics on the site usage.

Follow-up cookies allow us to measure how well our various marketing strategies are working.

## **Use of Google Cookies and Google Advertising Cookies**

Our site uses cookies from Google to enhance user experience and to display personalized advertisements. These cookies allow us to understand the preferences of our visitors and to adjust our content accordingly. They are also used to collect information about visitor interactions with our site, which helps us optimize our online presence.

Google's advertising cookies enable us to serve targeted ads through Google's advertising network. These cookies track user behavior on our site and other sites to display relevant ads based on your interests.

You have control over the use of these cookies. You can choose to disable Google's advertising cookies through your browser settings, or by visiting Google's Ads Settings page. For more information on managing cookie preferences and how Google uses data collected through cookies, please visit Google's Privacy and Terms page at <https://policies.google.com/technologies/partner-sites>

By continuing to use our site, you consent to the use of these cookies in accordance with our privacy policy. If you have any questions or concerns about our use of cookies, please feel free to contact us.

## **Browser**

You can manage cookies on any web browser that is installed on your computer or device. You can delete or allow these cookies, and you can specify which specific sites' cookies you'll allow. Mobile device browsers generally offer fewer customisation options than those on computers.

Depending on the user's browser, you can delete cookies as follows:

- *In Internet Explorer*
  - o Click on 'Extra' and then on 'Internet options'.
  - o Click on 'Settings' in the in the General tab, in the Browser History.
  - o Click on 'View files'.
  - o Select the cookies you want to block and click on 'Remove'.
  
- *In Firefox*
  - o Click on the browser's 'Extra' icon, choose the 'Options' menu.
  - o In the next window, choose 'Privacy' and click on 'View Cookies'.
  - o Select the cookies you want to block and click on 'Remove'.
  
- *In Safari*
  - o Click on the 'Edit' icon and choose the 'Preferences' menu.
  - o Click on 'Privacy' and then on 'View Cookies'.
  - o Select the cookies you want to block and click on 'Remove'.
  
- *In Google Chrome*
  - o Click on the 'Extra' icon, choose the 'Options' menu and then click on 'Options'.
  - o Click on 'Privacy'.
  - o Click on 'View Cookies'.
  - o Select the cookies you want to block and click on 'Remove'.

Please note: When you make changes, they won't affect cookies already installed on your computer prior to these changes. You must specifically remove these if you want to disable these cookies too.

Here, we want to specifically draw your attention the use of the Inspectlet system that allows us to see your surfing behaviour on our website. This is an important tool for us because we can get surfing and behavioural data from our website users, so we can then make changes or adjustments which make it easier to use our site, and to optimise your surfing experience. Our ability to observe your surfing behaviour is, of course, strictly limited to onsite surfing and we don't have any data about your offsite surfing behaviour. For more information about this application, please visit the developer's website: <http://docs.inspectlet.com>.

## **1.5. Sharing your information:**

### List makers:

As part of a collaboration between Kadolog, the Gezinsliga, Beonweb (Baby Ultra) and N2com (Babyboom.be), list makers' personal data can be shared with these companies. This can't happen without prior consent from the list makers, who expressly choose this by clicking on the "I would like to receive free parcels with samples, discount vouchers, and information from Babyboom, the Gezinsliga, and Kadolog's partners" button.

This shared data is strictly limited to your identity, contact information, and your preferences, which can be derived from the lists you created.

When it comes to personal data processed outside of the European Union, we make sure, by means of a contract or in another way, that this information is as safe as it would be in the European Union under European laws.

### Givers:

Givers' personal data collected on Kadolog will never be used for marketing or commercial purposes and will never be shared with third parties.

## 1.6. What choices do you have when it comes to your information?

- Our goal is to give you simple, useful options for your personal data. If you have a Kadolog account, many of the choices are an integral part of Kadolog or your settings. So, for example, you can:
  - Still change your profile data
  - Make your list accessible, or not, in Google, Bing, etc. search engines. You can change this via your list settings ('privacy'-tab). The 'Do not appear in search engines' option has been standard for all our lists since 2017. Since this system isn't fool proof, we recommend you check this on the search engines and contact us via our help and support desk if you do, indeed, find that it's been linked.
  - Link a password to your registry. Only friends and family with the password will have access to your list.
  - Hide your list by using the list settings ('privacy'-tab) and, so, not make it public.
  - Only make your list accessible via its URL.
  - Link your Kadolog account to other services (Facebook Connect).
  - Close your account at any time. When you close your account, we deactivate it and remove your lists and data from Kadolog.

## 1.7. How and when we share information:

### For the list makers:

- A registry on Kadolog is public by default: by going to Kadolog, everyone gets access to your gift list by searching for your list based on your name and surname, unless it's set up differently (for example, by making your list invisible by using a password and only making it accessible via the URL). On your registry, visitors have access to your name and surname, your welcoming message, and your wish list of items/gifts you'd like to receive/purchase. Your IBAN (if you want to receive a bank transfer) is shared when the giver enters their personal data and, if you prefer, your IBAN account will only be sent by e-mail. Visitors to the Kadolog site have no access to your e-mail address, postal address (unless this is needed for international transfers or home deliveries), or date of birth. They only have access to the information needed to give a donation/gift.
- To improve your experience with Kadolog and to make sure we make our personalisation more effective, and in compliance with the relevant laws. We share your personal information:
  - to anonymously monitor and improve how well our website works or how well our page content is, by using Google Analytics.
  - With external companies or third parties whom we ask to process information on our behalf (e.g. Lemon Way, our banking partner, whom we work with, so you can receive online payments, will verify your identity ('KYC 1 and KYC2'), as per the applicable anti-fraud and money laundering laws and their privacy policy) They can collect information from third parties to verify your identity.
  - With law enforcement and governmental agencies. We only share data if we think it is reasonably needed to comply with a law, regulation or lawful request to protect a public domain, a person, or Kadolog's rights and products, or to detect, prevent and deal with fraud or security or technical problems.

### For the givers:

- When you give a gift or donation on Kadolog, we share your name and surname, e-mail address, postal address (not compulsory) with, and your message to, the person for whom the gift is intended.
- To improve your experience on Kadolog and to make sure we make our personalisation works more effectively, and complies with the relevant laws, we share your personal information:
  - to anonymously monitor and improve how well our website works or how well our page content is, by using Google Analytics.
  - With external companies or third parties whom we ask to process information on our behalf (e.g. Lemon Way, our banking partner, whom we work with, so you can make online payments). They can collect information from third parties to verify your identity.
  - With law enforcement and governmental agencies. We only share data if we think it is reasonably needed to comply with a law, regulation or lawful request to protect a public domain, a person, or Kadolog's rights and products, or to detect, prevent and deal with fraud or security or technical problems.

## 2. Unsubscribing from marketing communications

If you don't want to receive marketing communication in any form, you can always object, without prejudice, to the use of your personal data for direct marketing purposes. Please contact us about this.

You can also use the unsubscribe option in the e-mail itself. To make our e-mail campaigns more effective, we use software to see if you open our e-mails and on which links you've clicked.

Please note: The fact that you no longer wish to get business communications from us doesn't affect our right to contact you, electronically, in the context of executing your contract or if we're legally obliged to do so.

### **3. How long do we keep your information?**

- We keep your information only for as long as we need it, for you to use Kadolog, and to fulfil the purposes described in this policy. This is also the case for anyone that we share your personal information with, and who carry out services on our behalf. When we don't need your data anymore, and we don't need to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or make it anonymous, so that we can't identify you.
- The list makers can store the data collected by means of their registers, including the givers' personal information, in their profile. This data storing option is a service offered by our website. It is clear that, in this case, we don't have the means to delete this data on our own initiative since the list makers decide on how their lists are managed and how long they are kept.

### **4. Our policy on children's information:**

- Children and people under 18 are not allowed to use Kadolog.

### **5. Your options:**

- You have options when it comes to the information that we have about you:
  - You can access the information we have about you. We'll share this information with you within 30 days of your request.
  - You can have your data corrected or deleted. You can update the information in your settings. If you have problems updating your details or if you'd like us to delete it, please contact us on our site's support service in the 'help' menu.
  - You can object to us processing your data. You can ask us to stop using your information, including if we use this to send you marketing e-mails. You can find this option at the bottom of the e-mails we send you.

### **6. How do we protect your details?**

- We do everything in our power to protect your privacy and personal data.
- Our employees are trained to deal with confidential data correctly. With every project, we first evaluate the security and protection of your information, when it comes to processing personal details, and protecting your interests is first and foremost.
- We use various technical measures to protect your personal data against unauthorised use and access and theft or loss, in particular: password protection, hard disk encryption software, firewalls, antivirus software, intrusion detection and irregularities, as well as access controls for our employees. In the case of a data breach with negative consequences, you, the client, are personally kept up to date with the lawful circumstances.
- The data control and storage software are continually being updated.
- There are a limited number of carefully selected employees with access to your information. They only have access to the personal details they need to be able to do their jobs properly.
- Your personal data is stored on computer servers in France.

#### **6.1. Automated decision-making**

We don't take automated decisions - whether or not based on profiling - that may have legal or far-reaching consequences for you.

#### **6.2. Security measures for subcontractors**

When processing has to be done on our behalf, we only use contractors who can adequately guarantee that they use the correct technical and organisational rules so that the processing meets this policy's demands and there is no doubt that your rights are being protected.

The contractor can't employ another subcontractor without our prior, specific or general, written permission. In the case of a general letter of consent, the contractor will tell us of all planned changes when it comes to adding or replacing other subcontractors, which gives us the chance to object.

Processing done by a contractor is laid out in an agreement, or other legal document, under EU or a member state's law, which binds the contractor to us and sets out the reason for the processing, how long it will take, its nature and purpose, the kind of personal information processed, and our rights and obligations.

This agreement, or other legal document, specifies, in particular, that the contractor:

- a) only processes your personal data solely on our written instruction; this includes the transfer of data to a third party or international organisation, unless they are lawfully obligated to do so under EU law or the law of a member country; in this case the contractor will tell us of this before starting with processing, unless the law in question prohibits this due to important matters of public interest;
- b) makes sure the people allowed to process these personal details commit themselves to respect confidentiality, or are subject to an applicable legal confidentiality agreement;
- c) makes all efforts needed to make sure the processing is secure;
- d) meets the conditions of the previous points for assigning a subcontractor;
- e) take into account the kind of processing, as set out by us, as much as possible, by using the proper technical and organisational measures to be able to respond to demands made by the affected people who want to exercise their rights.
- f) helps us make sure we comply with anticipated obligations, taking into account the type of processing and the details available to the contractor;
- g) deletes all personal data, at our discretion, or returns it to the party responsible for the processing at the end of the processing service, and destroys copied files, unless EU law or the law of a member state says the information must be kept; and
- h) gives us all the information we need to show that we comply with the obligations covered in this article and so that we, or an auditor we appoint, can do audits, including inspections, and contribute to these.

The contractor will also let us know right away if they think an instruction contradicts this policy or other provisions of EU law or the member states about data protection.

When one of our contractors enlists another subcontractor to do specific processing work, they have to comply with the same data protection obligations as those included in the contract, or other lawful document between the controller and the contractor, in an agreement or other legal document under EU or member state law, more specifically, giving enough guarantees to use the correct technical or organisational measures so that the processing complies with this policy.

If the subcontractor doesn't meet their data protection obligations, the original contractor remains entirely responsible.

### **6.3. What are your rights**

#### **➤ You're allowed access**

At all times, you have the right to ask if we process your personal data and, if we do, to see this information and get additional information, such as:

- why we process it;
- the categories of the details concerned;
- recipients or kinds of recipients (including third-party recipients);
- if possible, how long it is kept, and if this is not possible, how we decide on this period;
- the existence of your privacy rights;
- the right to complain to the relevant authority;
- the information we have about the source of the data if we get it from a third party; and
- the existence of an automated decision-making process.

You also have the right to a free copy of the processed data in an understandable format. We may charge a reasonable fee for the administrative costs for each additional copy you ask for.

#### **➤ You're allowed to correct your personal data**



You have the right to immediately correct personal information that is incomplete, incorrect, insufficient, or out-of-date.

In any case, to keep your details up-to-date, we'd like you to tell us of any changes, such as changing your home or e-mail address, or changes to your form of identity.

- [You're allowed to have your data deleted \(the 'right to be forgotten'\)](#)

You have the right to have your personal details deleted when:

- we don't need your information for the purposes we collected or otherwise processed it for, anymore;
- you no longer allow us to process it, and there is no other legal basis for us to continue processing your personal data;
- you object to your information being processed, and there's no lawful basis for us to keep doing so;
- your personal details are being processed unlawfully;
- your information must be removed to comply with a legal obligation;

please keep in mind that we can't always delete the requested personal data, for example, when we need to process it to create, apply, and defend legal rights or because we're legally obliged to do so. We'll give you more information about this in our response to your request.

- [You're allowed to limit processing](#)

You have the right to limit the processing of your personal data if:

- you don't agree with the information's accuracy: its use is limited during the time it takes us to check whether it is accurate;
- the processing of your personal data is illegal: instead of asking to have it deleted, you ask that your details' use be restricted;
- We don't need your information for the original goal of processing it, but we do need it to create, apply, and defend legal rights: instead of asking for your personal data to be deleted, it is only used to create, apply, and defend lawful rights.
- there is no decision about you exerting your right to object to the processing yet, and you can ask that your information be used in a restricted way.

- [You're allowed to take your personal data along](#)

You have the right to have your information 'returned', for example to make it easier to change providers. This can only be done for personal details you gave us yourself, if our website or the services it provides, allows this. In all other cases, you can't do this (for example, when the processing of your personal data is being done on the basis of a legal obligation).

There are two aspects to this:

- you can ask us to return the information in question in a structured, generally-used, machine-readable way; and
- you can ask for the details to be forwarded directly to another processing controller. In this case, you must personally make sure the (e-mail) address you give us for the transfer is correct and safe. We can refuse your request if the transfer is technically impossible.

- [You're allowed to object to the processing of your personal data](#)

You have the right to object to the processing of your information, based on your specific situation, if such processing is in our legitimate or general interest. We'll then stop processing your details unless we can show that there are legal, compelling reasons that outrank the reasons you've given, or if the processing of your personal data is connected to creating, applying, and defending lawful rights (for example submitting a request to a court).

#### **6.4. How we make changes to this policy:**

- We may need to change this policy. If we do, we'll post these changes on this page. If you continue to use Kadolog after these changes are in effect, you agree to the new policy. If the changes are significant, we may give you a more prominent notice or get your permission, as required by law.

Please contact us via our support service (on Kadolog, in the 'help' menu).