

# Privacy Policy

## DSTNY, UPDATED JUNE 2022

### Contents

Introduction.....	2
Dstny as data controller .....	2
Nature of the personal data and the purposes for which it is used by Dstny .....	2
Rights of the Data Subject (users) .....	2
Dstny as data processor .....	2
Approved (sub)processors.....	3
Cookies.....	4
How long is the personal data stored.....	5
Where is the personal data stored.....	5
Review and rectification of personal data and right to object .....	5

## Introduction

In this privacy statement you can read how we handle privacy on <https://www.dstny.com/>, operated by Destilink B.V (Dstny). We consider it important for personal data to remain personal and we therefore pay considerable attention to protecting your privacy as a data subject. The term 'data subject' refers to any living individual whose personal data is collected, held or processed by an organisation. To explain more about how this works, we have broken down our privacy policy for you in this statement.

## Dstny as data controller

As data controller, Dstny processes the (standard) personal data of the customer, to the extent necessary for the execution of the agreement between Dstny and its Customers, in order to comply with its legal obligations and, insofar as necessary to serve its legitimate interests.

## Rights of the Data Subjects (users)

Dstny respects the fundamental privacy rights of the data subjects: right of access and rectification or erasure, the right to request restriction of the processing of the data concerning the data subject, the right to oppose the processing and the right to data portability.

## Dstny as data processor

In the event that, in the course of providing service(s) or product(s), Dstny processes personal data for the customer or for a third party designated by the customer, then Dstny acts in the capacity of data processor and the Customer in the capacity of Data Controller, or, in turn, as processor for a third-party Data Controller. In that case, Dstny only processes the personal data on behalf of and strictly for the benefit of the Customer in accordance with their instructions and under their responsibility, unless otherwise required by law. Where appropriate, Dstny will establish a processing agreement with the Customer concerning the terms for the processing of the personal data with the Customer as data controller.

### Approved (sub)processors

Dstny works with (sub)processors listed below. Sub-processors sign a mandatory processor agreement with Dstny ensuring the appropriate processing of the data provided.

(sub)Processor	Purpose	Data that is shared	Processing inside the European Economic Area	More information
Piwik	Website analytics and cookie consent management	Please view: <a href="https://help.piwik.pro/support/privacy/what-data-does-piwik-pro-collect/">https://help.piwik.pro/support/privacy/what-data-does-piwik-pro-collect/</a>	Yes	<a href="https://help.piwik.pro/support/privacy/what-data-does-piwik-pro-collect/">https://help.piwik.pro/support/privacy/what-data-does-piwik-pro-collect/</a>  <a href="https://help.piwik.pro/support/privacy/cookies-created-by-piwik-pro/">https://help.piwik.pro/support/privacy/cookies-created-by-piwik-pro/</a>
Faqbot	Automated chat agent	IP address, Location data from IP address	Yes	<a href="https://faqbot.co">https://faqbot.co</a>

## Cookies

Cookies are small text files that can be stored on your computer or other device when you visit the website of Dstny.

There are essential and functional cookies that ensure that the website functions properly. These cookies are not used to identify the user.

There are also non-functional cookies. These are cookies that can be added for statistical, social, targeted or commercial purposes. They have nothing to do with the strictly technical support of the website.

Cookies can be installed by the server of the website that you visit or by partners with whom you work. In other words, there are First party cookies that Dstny installed and manages, and there are Third party cookies, that a third party installs and manages. They ensure that certain information is sent to third parties as a result of your visit.

Cookies can have different purposes: there are technical cookies (for example, for keeping track of language settings), session cookies (temporary cookies that expire after one session) and tracking cookies (cookies that monitor and track your behaviour on the Internet, in order to be able to offer you a more optimal user experience).

## PURPOSE AND VALUE OF COOKIES

Dstny aims to inform every visitor to the website as thoroughly as possible about which cookies Dstny uses.

Dstny requests the explicit consent of the user for the use of non-functional or non-essential cookies that (may) relate to personal data. The user has the option to withdraw this consent at any time or to choose which cookies he or she accepts or declines.

## TYPES OF COOKIES USED BY DSTNY

We distinguish the following types of cookies, according to their purposes:

### **Essential / necessary cookies:**

These cookies are necessary to enable the website to function and cannot be disabled in our systems. They are usually only enabled in response to actions you have taken, such as setting your privacy preferences or filling in forms. They are necessary for smooth communication and facilitate navigation (for example, returning to a previous page, etc.).

### **Functional cookies:**

These cookies allow the website to offer enhanced functionality and personalisation. They can be enabled by us or by external providers whose services we have added to our pages.

### **Analytical cookies:**

These cookies allow us to track visits and traffic so that we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and how visitors navigate through the website.

### **Targeting / advertising cookies:**

These cookies can be installed by our advertising partners via our website. They can be used by those companies to create a profile of your interests and show you relevant ads on other sites. We use our own cookies, on one hand, plus cookies from carefully selected partners with whom we collaborate and who advertise their services on our website, on the other.

Technical details about which type of cookies and storage periods per type can be requested via [privacy@dstny.com](mailto:privacy@dstny.com).

## How long is personal data stored

Data about visitors to our website is retained for 12 months year.

## How is personal data stored

With regard to the personal data in question, Dstny takes appropriate technical and organisational measures to enable adequate security to be provided and to ensure that this personal data cannot be subject to unauthorised or unlawful processing. Our focus on security includes hardware, software, physical security, policy rules, awareness raising and settings in hardware and software. To this end, Dstny uses advanced techniques (such as firewalls, spam filters and virus scanners, two-way factor authentication and device management applications) to protect against security breaches, viruses, spam and malware.

## Where is personal data stored

All data will be processed and stored within the European Economical Area.  
Sidsbrytning

## Review and rectification of personal data and right to object

Would you like to review the personal data that we, as data controller, process about you? Do you have an objection to the processing? Would you like to submit a request for rectification or deletion of your personal data or would you like to exercise your right to data portability? You can contact us via

[privacy@dstny.com](mailto:privacy@dstny.com)

Or

Dstny  
Privacy department  
Excelsiorlaan 89  
1930 Zaventem  
Belgium

If you have a complaint about the way in which we process personal data, you can also submit your complaint to the aforementioned e-mail or postal address. We will then reply to you within the legally stipulated deadline, after valid identification. If you are not satisfied with the handling of your complaint, then you may submit a written complaint to the Data Protection Authority (Gegevenbeschermingsautoriteit):

Data Protection Authority  
Drukpersstraat 35, 1000 Brussel, Belgium  
+32 (0)2 274 48 00  
[contact@apd-gba.be](mailto:contact@apd-gba.be)  
<https://www.dataprotectionauthority.be/citizen>

Dstny reserves the right to modify this privacy policy at any time. The privacy policy on <https://www.dstny.com> is the most recent version and replaces any previous privacy policies.