

TWINTEC GROUP PRIVACY POLICY

1. Data Controller and Data Protection Officer

1.1. In this privacy statement, TWINTEC GROUP below: " TWINTEC " (or "we") explains how it manages your personal data as "controller". This privacy statement applies to the processing of personal data of customers, potential customers (prospects) and individuals who contract with TWINTEC in any other way as buyer or supplier. TWINTEC has a registered office which you can contact at the coordinates mentioned in point 7.4.

The operating offices of TWINTEC GROUP are mentioned on our website:

<https://www.twintecgroup.com/contact-us>

1.2. All information concerning an identified or identifiable natural person is personal data. This is information that can reasonably be linked to an individual.

1.3. The data protection officer is THEMIS-SECURITY.

He can be reached at the following coordinates:

Rue de l'Abbaye n ° 5 at 4040 Herstal

Phone : +32 4 378 32 30

Mail : info@themis-security.be

2. Personal Data that we process as a Data Controller

2.1. TWINTEC may collect your personal data in several ways. We process the personal data that you communicate to us when you participate in an action or use our services and that you communicate data to us directly or indirectly or allow us to save data on your interests, behaviour and preferences (cookies).

Information you provide to us

2.2. If you submit a request to TWINTEC, for example via the website, we need the following personal information:

- a) Name, address, postal code, country;
- b) E-mail address and telephone;
- c) Possibly other information that is relevant to your request, such as for example, your activity or other additional options.

2.3. If you conclude a contract with TWINTEC, we need, depending on the type of contract, product or service, the following personal information:

- a) Name, address, postal code;
- b) Number telephone and address email;
- c) Business number;
- d) Financial data (bank account).

This personal data must be communicated to us directly. If you do not provide us with the "mandatory" information (which differs depending on the type of contract), we may not be able to provide you with the requested service and conclude the contract.

Information about your use of our services and / or products

- 2.4. If you make use of the services offered by TWINTEC or conclude a contract with us, we process data such as:
- a) data relating to your machine, for example a MAC address, an IP address or another number;
 - b) your preferences and communication parameters;
 - c) the data that we link to certain profiles that we draw up of you according to your consumption behavior (for example, the frequency with which you visit our site, make a purchase or request a service);
 - d) browsing behaviour, determined based on our own observations or cookies (see also article 6 of this privacy statement);
 - e) the results of customer satisfaction surveys;
 - f) data concerning your use of the services we offer.

3. Foundations and Legitimate Interests

We are committed to protecting the privacy and rights of individuals in accordance with the General Data Protection Regulation (GDPR). Where we process personal data of individuals located in the European Economic Area (EEA) or the United Kingdom, we do so lawfully, fairly, and transparently. We collect and use personal data only for specified, explicit, and legitimate purposes, and we ensure it is adequate, relevant, and limited to what is necessary.

We process personal data on the following legal grounds:

- a) Consent;
- b) Execution of a contract concluded with you or of pre-contractual measures;
- c) Legal obligation;
- d) Execution of a public interest mission;
- e) Legitimate interest of TWINTEC or a third party.

We process personal data in a legitimate interest when we use your data to provide services and content, related products and services, to communicate with you and for advertising or marketing purposes in connection with products or services that you have bought in the past. Our legitimate interests include, for example: marketing and advertising related products or services that you have purchased in the past, communication, management and information security, research and analysis of our products or services, business management, affairs legal, internal management and sharing with our affiliates.

4. The purposes for which we process personal data

4.1. TWINTEC processes personal data for the purposes (goals, objectives) mentioned below:

- a) maintain customer relations (including maintaining a direct relationship between TWINTEC, members of the TWINTEC network, service partners including for the performance of a contract and the pursuit of legitimate interests);
- b) process and administer orders (including invoicing) to respond to your request and / or prepare or execute a contract;
- c) provide customer service, fulfill warranty obligations and those of members of the approved network or service partners, deal with complaints and requests, respond to your requests and execute contracts, or for legitimate interests;
- d) proactively contact customers in the event of a defect or to schedule service appointments, perform a contract or for legitimate interests;
- e) carry out or coordinate any recall actions, due to legitimate interests or legal obligations;
- f) carry out market research to improve our operations, our brands, our services and our products, and identify the wishes of customers, due to legitimate interests;
- g) the sending of informative and commercial messages by electronic mail, post or other communication channels. For direct marketing, you always have the possibility to unsubscribe by opposing the processing, or by withdrawing your consent if you have given it;
- h) advertising and marketing, including targeted advertising (“interest-based ads”, for example via Facebook and Google) to connect devices and analyze the impact of advertising and marketing activities due to our legitimate interests;
- i) respect legal obligations, settle disputes and enforce our rights;
- j) improve the quality of the data by means of the address and the postal code control, because of our legitimate interests;
- k) link and analyze cookies from our websites to customer data that we know. We do this to adapt the content of our communication as much as possible to your personal preferences, for the pursuit of our legitimate interests.

5. GDPR Compliance and Organisational Responsibilities

We ensure that all employees, contractors, and authorised third parties understand and fulfil their responsibilities for protecting sensitive materials and personal data. This includes complying with

applicable laws, contractual obligations, and our internal policies. Access to sensitive information is restricted to those who require it for legitimate business purposes, with access rights granted, monitored, and revoked in line with defined procedures. Personnel must handle sensitive materials with care, maintain confidentiality, and promptly report any actual or suspected security incidents. We provide regular training, guidance, and oversight to uphold these responsibilities and ensure secure, lawful processing that respects individual rights.

We process personal data only when we have a valid lawful basis under the GDPR. Depending on the context, this may include:

Processing Activity	Lawful Basis	Example Scenarios
Providing our products and services	Performance of a contract (Art. 6(1)(b))	Creating user accounts, fulfilling orders, managing customer relationships
Communicating with individuals and responding to enquiries	Legitimate interests (Art. 6(1)(f))	Addressing support requests, notifying about service updates, maintaining business relationships
Marketing and promotional communications (where required)	Consent (Art. 6(1)(a))	Email newsletters, event invitations, product updates (with the option to withdraw at any time)
Compliance with legal obligations	Legal obligation (Art. 6(1)(c))	Record keeping, reporting to regulatory authorities, tax compliance
Security, fraud prevention, and risk management	Legitimate interests (Art. 6(1)(f))	Monitoring system access, detecting misuse, preventing unauthorised transactions
Processing special category data (if applicable)	Explicit consent (Art. 9(2)(a)) or employment/social protection law (Art. 9(2)(b))	Health and safety requirements, workplace accommodations

We balance our legitimate interests against the rights and freedoms of individuals and, where necessary, implement safeguards to protect personal data. Where consent is the basis, individuals can withdraw it at any time using the contact details in this policy.

We ensure that employees and relevant contractors are made aware of their obligations regarding data protection, privacy, and information security. Guidance on the secure handling of personal data and

sensitive materials is provided through our internal policies, procedures, and communications. Staff are expected to familiarise themselves with these requirements, follow best practices for safeguarding information, and seek advice where clarification is needed.

6. Third Parties Involved in the Processing

6.1. In some cases, TWINTEC shares personal data with third parties, who are independent "controllers". We explain below when this is the case and why. TWINTEC may share data with:

- a) service partners of the TWINTEC distribution network, for the performance of a contract or for the pursuit of legitimate interests;
- b) third parties to whom we are legally obliged or authorized to provide data;
- c) third parties, if we suspect a violation of the rights of third parties, criminal offenses or abuse, if they have a legitimate interest or if they are public authorities. They may also be authorities such as the police, the public prosecutor;
- d) the parties who assist TWINTEC in its services and are not subcontractors of personal data for the pursuit of its legitimate interests;
- e) the parties who assist TWINTEC in the development of (direct) marketing activities in the pursuit of its legitimate interests.

6.2. The communication of personal data to the third parties referred to above will only take place if this is authorized based on applicable laws and regulations.

6.3. TWINTEC also uses third-party services that act as "subcontractors" (for example, hosting service providers, certain software providers, mobility service providers or parties who organize or carry out actions or surveys for TWINTEC). With these providers, TWINTEC is obliged to conclude a subcontracting agreement which stipulates that they only process personal data in accordance with the instructions and under the control of TWINTEC.

6.4. Currently, we do not store personal data outside the European Union. If personal data were to be deliberately communicated outside the European Union, we will take additional guarantees such as, for example, the conclusion of a standard contract of the European Union.

6.5. Our websites may contain references and / or hyperlinks to one or more third party websites. TWINTEC is not responsible for the way in which these third parties process personal data. We recommend that you read the privacy statement of these websites to know and control how they process your personal data.

6.6. As part of our activities (accommodation, back up, website), we process the personal data that you provide to us as a subcontractor about article 8 of the RGPD regulations. This processing is governed by our "GDPR agreement", transmitted when our contracts are signed.

7. Marketing, Profiling and Cookies

7.1. Additionally, we and third parties automatically collect certain information about the history of your activities on our website internet and third-party applications using automated means, such as cookies, according to the preferences you provided. Via certain cookies and similar technologies, unique cookie IDs or other identifiers are assigned or collected. In this way, data can be collected while you are using the website or applications or when these are running in the background on your machine. We may

combine them with other information about you or your machine, such as an IP address. If we need permission for this, we will ask for it before we process it.

7. 2. We invite you to read our cookie statement for more information on cookies and similar technologies used and on the configuration of your preferences.

8. Your Rights, Including your Right to Object

8.1. You have the right to know what personal data we have stored about you and to whom we have communicated your personal data.

8.2. In addition, you have the right to ask us, in compliance with applicable law, to correct, update, delete your personal data, limit the processing of your personal data or to provide your personal data in a structured format, commonly used and machine-readable for transmission to another company.

8.3. We are required to draw your attention to your absolute right to object to direct marketing and to your rights to object to any processing, including profiling, carried out for the pursuit of the legitimate interests of TWINTEC or a third party and to submit a complaint to a data protection authority https://edpb.europa.eu/about-edpb/board/members_en

8.4. The rights of access, rectification, limitation of processing, erasure, or portability of your data, as well as a withdrawal of agreement, can be exercised free of charge by e-mail, form, telephone or letter to following addresses or numbers:

Email: DPO@twintecgroup.com

Post: 19 Rue Aldringen, L-1118 Luxembourg

Phone: +352 621 595628

Website: www.twintecgroup.com

9. Security

9.1. We have taken appropriate technical and organizational measures to protect your personal data from unauthorized or unlawful processing.

9.2. If you have the impression that your data is not correctly secured or if you have evidence of improper or irregular use of your personal data, please contact our customer service at the address mentioned in point 7.4 above.

9.3 We maintain robust technical and organisational measures to protect all personal data and sensitive materials against unauthorised access, alteration, disclosure, or destruction. Our IT infrastructure is safeguarded by enterprise-grade firewalls, up-to-date anti-virus and anti-malware protection, and secure network configurations. All company laptops, mobile devices, and systems are password-protected, encrypted where appropriate, and configured to automatically lock after periods of inactivity. Access to systems and data is restricted to authorised personnel based on role requirements,

10. Shelf Life

We only keep personal data for as long as necessary for the purposes for which it was obtained, unless we are legally obliged to keep personal data for a longer period or if this appears necessary for the management of a possible dispute.

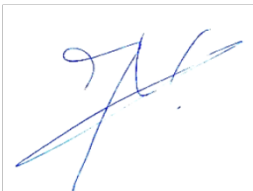
11. Modification

11.1. We reserve the right to unilaterally modify or supplement this privacy statement. We will inform you as far as possible of any changes. We recommend that you periodically review our privacy statement.

11.2. This privacy statement was last updated on August 06, 2025 and will be reviewed annually.

12. Contact / Questions

12.1. For questions or comments concerning this privacy statement and / or the processing of personal data, you can contact us at the addresses or numbers mentioned in point 8.4 above.



Signed

Julien Lazzari

CEO – Twintec Group