

Cookies & Privacy Policy

1. Consent to use your personal data

By using this Website you consent that we use your personal data in accordance with this Cookies and Privacy Policy ("Privacy Policy"), which describes how we handle your personal information on this Website. You also acknowledge that the personal data provided are necessary for Sunrise providing you with the Website and the Software (as defined in the Terms of Use available here).

The Website is owned by Sunrise SPRL, with registered office at 5101 Erpent (Belgium), Chaussée de Marche, 569 ("Sunrise", "we" or "us").

Sunrise shall act as "data controller" when processing your personal data.

In this Privacy Policy, "personal data" and "data controller" have the meaning of the Data Protection Directive 95/46/EC, the Belgian Act of 08 December 1992 on the protection of privacy in relation to the processing of personal data and its implementing decrees, and from 25 May 2018 in its successor legislation, the General Data Protection Regulation (and any Belgian act and/or decree implementing it), together the "Applicable Law".

2. Use of Cookies

2.1. What are cookies?

Cookies are small text files which are placed on the computer or electronic device of a website user to provide the website operator with information about the use of the website. They are used to enable websites to function or to provide information to the owners of a website.

Some cookies are deleted when you close down your browser. These are known as session cookies. Others remain on your computer or electronic device until they expire or you delete them from your cache. These are known as persistent cookies and enable the website operator to remember information about you as a returning visitor.

To learn more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org. Alternatively, you can search the internet for other independent information on cookies.

2.2. Why do we use cookies?

We use cookies on our Website for the following purposes:

Analytical purposes: Analytical cookies allow us to recognise, measure and track users of our Website in anonymous form. The information collected includes the number of visitors to our Website, where visitors have come to our Website from and the pages that they have visited. This helps us to improve the way our Website works, for example, by determining whether Website visitors can find information easily, or by identifying the aspects of the Website that are of the most interest to them.

Usage preferences: Some of the cookies on our Website are activated when visitors make a choice about their usage of our Website. The Website then 'remembers' the settings preferences of the concerned user. This allows us to tailor aspects of our Website to the individual user.

Disclaimer: We use cookies on our Website to record when a Website visitor has seen a policy, such as this one, or provided his consent, such as consent to our Terms of Use. This helps

improving the user's experience on our Website – for example, it avoids a user from repeatedly being asked to consent to the same terms.

Session management: The Software that runs our Website uses cookies for technical purposes, as needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of our Website they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for our Website to work.

Functional purposes: Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

2.3. Your cookie preferences

To make full use of this Website, your computer will need to accept cookies, as this Website will not function properly without them. In addition, cookies are required in order to provide you with personalized features on this Website.

If you wish to remove cookies set by this Website from your browser in the future, you may delete them. The instructions for removing cookies from your computer or electronic device depend on the operating system and web browser you use. Please note, however, that withdrawing your agreement to the use of cookies on this Website will impair the functionality of this Website.

2.4. Third party cookies

When you visit this Website, you may receive cookies that are set by third parties. These may for example include cookies set by Google. These cookies are used for the purposes described above. We do not control the setting of these third party cookies, so we suggest to check the third party websites for more information about their use of cookies and how to manage them.

3. Use of your personal data

3.1. Personal data that we can collect about you

We may collect and process the following personal data about you in accordance with this Privacy Policy:

personal data that you provide us via our website, including but not limited to name, first name, address, phone number, profession, etc.; you acknowledge providing us with accurate, complete and updated registration information;

if you contact us, we may keep a record of that correspondence and may record telephone calls for regulatory compliance and record keeping purposes; and

details of your visits to our website and the materials and information that you access.

3.2. Purposes of the processing of your personal data

We may use data held about you for the following purposes:

to provide the Software, the access to the Website and other related services;

to support your interaction with us, including to ensure that the content of this Website is presented in the most effective manner for you and your computer or electronic device;

to provide you with information you may have requested through this Website;

to notify you about changes to this Website and to ensure the ongoing accuracy and relevance of such data;

to provide you with information on our products;

for general internal research purposes, including to identify and analyse the regularity of the use of this website and the nature of this Website's users;

to design products and services for your use; and

to inform third-party companies about (pseudonymized) data for commercial purposes.

3.3. Duration of storage of your personal data

We will store the personal data that you send to us via this Website on our databases. We will retain your personal data for as long as your account is active or as needed in order to provide you the services requested or to answer queries or resolve issues with us.

After this period, your personal data shall be deleted from our databases, except if we are required to store them by law for a longer period.

3.4. Recipients and transfer of your personal data

We may disclose your personal data to our affiliates, agents and contractors (including to parties located outside the European Economic Area – "EEA") for the purposes stated above. We will however not share your personal data to any other third parties, unless legally obliged by law, such as by court order or otherwise requested by you.

Any transfer of personal data to a country outside of the EEA will be made in accordance with Applicable Law and appropriate and suitable safeguards will be taken. You have the right to obtain a copy of the appropriate and suitable safeguards taken by contacting us as provided below.

3.5. Security of the personal data

Sunrise shall take the appropriate technical and organizational measures in order to ensure a level of security adapted to the risks and to avoid, to the largest extent possible, any unauthorized destruction, loss, alteration, communication or access to the personal data.

3.6. Your rights related to your personal data

You have the right to (i) access your personal data; (ii) require the correction of your personal data if and to the extent you can prove such data is inaccurate; (iii) request the deletion of your personal data if the conditions of the General Data Protection Regulation are met; (iv) object to the processing of your personal data on grounds relating to your personal situation and/or request its restriction; (v) object against the use of your personal data for direct marketing purposes and (vi) request a copy of your personal data in a structured, commonly used and machine-readable format ("data portability").

You also have the right to withdraw your consent for the processing of your personal data at any time provided that the conditions of the General Data Protection regulation are met. You however acknowledge that any processing carried out prior to such withdrawal will not affect the lawfulness of the processing based on your consent before the withdrawal and that you will not be able to use the Website anymore after that withdrawal.

Any request to exercise such rights must be addressed as provided below.

If you deem it necessary, you also have the right to file a complaint regarding the use of your personal data by us with the relevant supervisory authority.

Where requests are manifestly unfounded or excessive, for example because of their repetitive character, we may either (i) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or (ii) refuse to act on the request.

4. To contact us

If you have any questions about this Privacy Policy or our related practices or if you wish to exercise the above rights, please contact the Data Protection Officer (DPO) at mydata@neomalabs.com.

5. Changes to this Privacy Policy

We retain the right to update, change and erase any part of this Privacy Policy at any time. Any changes will be published here immediately and it is your responsibility to check back regularly. We will however contact you directly if we decide to use your personal data in a way that is contrary to this Privacy Policy and you will be given the choice as to whether or not to be included in its new use.