

# Privacy Policy

This version of the Privacy Policy will be applicable as of **6 January 2025**.

## 1. Preamble

Greenomy SRL (“Greenomy”, “we”, “our”, “us”) considers the safeguards of Personal Data of Users of its Services of paramount importance. For this reason Greenomy complies with the EU General Data Protection Regulation 2016/679 (“GDPR”).

This Privacy Policy sets out how Greenomy will handle your Personal Data when using our Services.

## 2. Data controller

For the purpose of this Privacy Policy, Greenomy is the Data Controller of your Personal Data.

<b>Name</b>	Greenomy SRL
<b>Address</b>	Avenue Louise 54, 1050 Brussels, Belgium
<b>Email</b>	privacy@greenomy.io

## 3. Employees, service providers and Greenomy’s affiliates

We may disclose your Personal Data to some of our employees, our service providers and Greenomy’s Affiliate insofar as reasonably necessary for the purposes set out in this Privacy Policy.

Greenomy has in place written agreements with each of its service providers that are compliant with GDPR. Nevertheless, Greenomy remains responsible for the processing of Personal Data within its Services.

Except as provided in this Privacy Policy, we will not share your Personal Data to any third party.

#### 4. Cookies

To find out more about how we use cookies, please see our [Cookies Policy](#).

#### 5. Book a demo, Newsletter, Ebook and E-Brochure & Privacy

##### 5.1. Personal Data we collect

Personal Data	Source
First name and last name, email address	Submitted by User when requesting a demo of our Services via the "Book a Demo" page of our Website.
Email address	Submitted by User when subscribing to our newsletter via our Website.
First name and last name, email address	Submitted by User when requesting access to our ebooks and/or e-brochures via our Website.

##### 5.2. How we use your Personal Data and on which legal basis

###### a. Business operation

We use your Personal Data to communicate effectively with you, conduct our business and respond to your demo requests (Article 6.1.(b) and 6.1.(f) GDPR). We use your email address for the sole purpose of sending you the newsletter. The processing of the Personal Data entered into the newsletter subscription

form occurs exclusively on the basis of your consent (Art. 6.1.(a) GDPR). You may revoke this consent at any time, by clicking on the “Unsubscribe” link in the newsletter. We use your email address for the sole purpose of sending you the ebook and/or e-brochure. The processing of the Personal Data entered into the ebook form occurs exclusively on the basis of your consent (Art. 6.1.(a) GDPR).

#### b. Advertising

We may use your Personal Data to deliver targeted advertisements about Greenomy products and services on social media platforms and search engines, subject to your informed consent (Article 6.1.(a) GDPR). You may revoke this consent at any time, by sending an email to [marketing@greenomy.io](mailto:marketing@greenomy.io).

#### c. Communicating with you

We use the Personal Data we collect to communicate with you on our Services and related offers where you have shown interest in. We do this on the basis of our legitimate interests (Art. 6.1.(f) GDPR).

### **5.3. How do we share your Personal Data and with whom**

If you book a demo with Greenomy via our Website, the below Personal Data that you submit to us will be forwarded to our calendar services provider. Subject to your consent as explained above, access to your Personal Data is also granted to, social media platforms and search engines to enable targeted advertising on their platforms.

### **5.4. How long we store your Personal Data**

Your Personal Data submitted for booking a demo will be stored within our calendar services provider's database for the period defined by its privacy policy and in our internal computer systems as long as you are still interested in a Greenomy demo.

The Personal Data you submitted for the purpose of subscribing to the newsletter will be stored by Greenomy until you unsubscribe from the newsletter, following which your Personal Data will be deleted from the newsletter distribution list.

The Personal Data you submitted for the purpose of downloading our ebook and/or e-brochure will be stored by Greenomy in accordance with our legal and regulatory obligations..

In the event of advertising, your Personal Data will be stored within the social media platforms' and

search engines' databases for the period defined by their respective privacy policies and in our internal computer systems in accordance with our legal and regulatory obligations, until you remove your consent.

## **6. Platform & Privacy**

### **6.1. Personal Data we collect**

<b>Personal Data</b>	<b>Source</b>
First name and last name, professional email address	Submitted by Users when creating a User Account on our Platform.

### **6.2. How we use your Personal Data and on what legal basis**

#### **a. Create and manage your account to use the Services**

By accepting to use the Services, you and your end customers are entering into a business relationship with Greenomy. We process required Personal Data to perform our contractual obligations toward you and your end customers. This includes: setting up a User Account and providing important information related to the Services (Article 6.1.(b) GDPR).

#### **b. Customer Support**

We process your Personal Data to administer our customer relationship with the company you represent, including managing your user account, providing customer support, and documenting support matters (Article 6.1.(b) GDPR).

#### **c. Prevent fraud and protect our Services.**

We have a legitimate interest in ensuring the ongoing security and proper operation of our Services and associated IT services and networks by enabling secure logins (Article 6.1.(f) GDPR).

#### **d. Send communications to you**

We have a legitimate interest in providing you with updates on our Services and related offers where you have purchased or shown interest in similar services from us (Article 6.1.(f) GDPR).

#### e. General aggregation of Personal Data

We have a legitimate interest in creating aggregate data sets for benchmarking purposes as an additional service to Users (Article 6.1.(f) GDPR). These data sets do not allow (directly or by inference) the re-identification of any data subject as the source of such data. Legitimate interestWe may process your information based on our legitimate interests in communicating with you and managing our interactions as well as performing obligations to you and your end customers regarding our Services (Article 6.1.(f) GDPR).

### 6.3. How long we store your Personal Data

We will keep your Personal Data for as long as we have a contractual relationship with you. Afterwards, we will retain your Personal Data to comply with our legal obligations and unless you request the deletion of your Personal Data.

## 7. Greenomy Academy & privacy

### 7.1. Personal Data we collect

Personal Data	Source
First name and last name, professional email address	Submitted by Users when creating a User Account on the Greenomy Academy

### 7.2. How we use your Personal Data and on what legal basis

#### a. Providing courses

We use your Personal Data to enable you to navigate the Greenomy Academy, to enrol and participate in courses and programs on the Greenomy Academy, to learn effectively in such courses and programs, to obtain products and services on the Greenomy Academy such as certificates. We offer products and services on the basis that it is necessary to fulfil our contractual obligations to you under the Terms of Use (Art. 6.1.(b) GDPR).

#### b. Communicating with you

We use information we collect to communicate with you, including answering your course and platform questions and notifying you of course and Greenomy Academy maintenance and updates. We do this on the basis of our legitimate interests in keeping learners up to date about our courses and responding to learner questions (Art. 6.1.(f) GDPR). We also use the Personal Data we collect to communicate with you on our Services and related offers where you have shown interest in (Art. 6.1.(f) GDPR).

#### c. Advertising

We may use your Personal Data to deliver targeted advertisements about Greenomy products and services on social media platforms and search engines, subject to your informed consent (Article 6.1.(a) GDPR). You may revoke this consent at any time, by sending an email to [privacy@greenomy.io](mailto:privacy@greenomy.io).

### 7.3. How do we share your Personal Data and with whom

Subject to your consent as explained above, access to your Personal Data is also granted to, social media platforms and search engines to enable targeted advertising on their platforms.

### 7.4. How long we store your Personal Data

We will retain your Personal Data for as long as your account is active or as needed for the Greenomy Academy or to comply with our legal obligations, resolve disputes, enforce our agreements, and as otherwise permitted by applicable law.

Your Personal Data submitted will be stored within our search engines and social media platform's database for the period defined by their respective privacy policies

## 8. Webinar & Privacy

### 8.1. Personal Data we collect

Personal Data	Source
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<b>First name and last name, professional email address</b>	<b>Submitted by you when registering for our Webinar.</b>
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## **8.2. Session's recording**

Greenomy may record the Webinar with a view to publish it on the Platform and the Website to allow its customers to watch the event online. If that is the case, this will be mentioned on the Webinar invitation.

We may record the Webinar solely for the purpose of making it available for invitees who would like to replay it or could not attend it. If the Webinar is recorded, we will inform you and take measures to keep the participants list anonymous. If the Webinar is recorded for further publication, we will make it clear in the invitation.

## **8.3. How we use your Personal Data and on what legal basis**

### **a. Participation in to Webinars**

We use your Personal Data to manage the attendance to our Webinar and keep you updated about them. This includes sending you notifications before the Webinars take place so that you can participate in them (Article 6.1.(b) GDPR).

### **b. Communication**

We use the Personal Data we collect to communicate with you on our Services and related offers where you have shown interest in. We do this on the basis of our legitimate interests (Art. 6.1.(f) GDPR). In addition, when applicable, we use your Personal Data to communicate the name of participants to Greenomy's partner co-hosting the webinar. The legal basis for this processing is our legitimate interest in effectively organizing and managing the event in collaboration with our partner (Article 6(1)(f) GDPR).

### **c. Promotion**

We may use your Personal Data to inform you of similar future Webinars or to send surveys about Webinars (Article 6.1.(f) GDPR).

### **d. Advertising**

We may use your Personal Data to deliver targeted advertisements about Greenomy products and

services on social media platforms and search engines, subject to your informed consent (Article 6.1.(a) GDPR). You may revoke this consent at any time, by sending an email to [privacy@greenomy.io](mailto:privacy@greenomy.io).

#### **8.4. How do we share your Personal Data and with whom**

Your Personal Data submitted for attending our webinar will be stored within our webinar hosting provider's database for the period defined by its privacy policy and in our internal computer in accordance with our legal and regulatory obligations.

Subject to your consent as explained above, access to your Personal Data is also granted to, social media platforms and search engines to enable targeted advertising on their platforms. As mentioned above, your Personal Data may also be shared with Greenomy's partner co-hosting the webinar, if applicable.

#### **8.5. How long we store your Personal Data**

Your Personal Data submitted for attending our webinar will be stored within our webinar hosting provider's and search engines and social media platform's database for the period defined by their respective privacy policies and in our internal computer in accordance with our legal and regulatory obligations.

### **9. Potential Partner & Privacy**

#### **9.1. Personal Data we collect**

Personal Data	Source
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First name, last name,  
email address

Submitted by you when submitting a partner request via the  
"Partners" page of our Website.

#### **9.2. How we use your Personal Data and on which legal basis**



We use your Personal Data to communicate effectively with you, conduct our business and respond to your partnership requests (Article 6.1.(b) and 6.1.(f) GDPR).

### **9.3. How long we store your Personal Data**

Your Personal Data submitted for a partnership request will be stored within our internal computer systems as long as you are still interested in a Greenomy demo.

## **10. Careers & Privacy**

In order to see which Personal Data we collect in our recruitment process, how we use your Personal Data, on what legal basis, and for how long we store your Personal Data, please visit:

<https://careers.greenomy.io/privacy-policy>.

## **11. Your Rights Over Your Personal Data**

### **11.1. Your rights**

You have the following rights regarding your Personal Data:

- a. To know how we are processing your Personal Data and to access to your Personal Data held by Greenomy (DSAR-01);
- b. To request the rectification of inaccurate or incomplete Personal Data (DSAR-02);
- c. To request the erasure of your Personal Data when, among others, such data is no longer necessary for the initial purposes for which it was initially collected, in accordance with applicable law (DSAR-03);
- d. To restrict our processing of your Personal Data, under certain circumstances (in which case we will only retain the Personal Data for the exercise and/or defence of Greenomy's rights) (DSAR-04);
- e. To request the portability of your Personal Data, which will allow you to obtain and reuse the personal data in a usable electronic format for your own purposes and across different services without hindrance to usability, including its transmission to another third party (DSAR-05);

To withdraw the consent you may have granted to a specific processing, at any time DSAR-06).

### **11.2. How to exercise your rights**

**In order to exercise any of these rights, please send your Data Subject Access Request by email to [privacy@greenomy.io](mailto:privacy@greenomy.io) specifying the code of your specific request.**

### **11.3. Right to lodge a complaint with supervisory authority**

In accordance with Article 77 GDPR you have the right to lodge a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that Greenomy's processing of your Personal Data infringes the GDPR.

Please visit the website of your relevant supervisory authority for more information on how to submit such a complaint.

## **12. Security of Your Personal Data**

Security is in our DNA and embedded in our people, processes, and technologies. We take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your Personal Data. We have implemented several management systems that attest to our security maturity:

- ISO 27001 Certified - Information Security Management System (ISMS)
- ISO 27701 Certified - Privacy Information Management System (PIMS)
- SOC 2 Type 1 - Attestation of controls designed and implemented.

For more information, feel free to reach out to [support@greenomy.io](mailto:support@greenomy.io).

## **13. Third-party Websites**

The Website and the Greenomy Academy may contain links to third party websites. Greenomy is not responsible for the privacy policies or practices of third party websites, so you should pay attention anytime you are redirected to a third-party website and be sure to review its privacy policy.

## **14. Subprocessors**

Greenomy leverages certain third-party service providers to assist us in delivering and maintaining our Services. These Subprocessors are carefully evaluated, selected and bound by contractual obligations that match our own stringent data security and privacy standards, available on the Trust Portal.

We employ commercially reasonable measures to ensure Subprocessors only process your Personal Data for the specific purposes outlined in this Privacy Policy and solely in accordance with our documented instructions.

We implement Data Processing Agreements (DPAs) as well as Standard Contractual Clauses (SCCs) in accordance with Article 46(2)(c) of the GDPR where applicable with the Sub-processors that require them to:

- Implement and maintain robust technical and organisational safeguards to protect the confidentiality and integrity of your Personal Data.
- Process your Personal Data exclusively in accordance with our instructions and all applicable laws and regulations.
- Refrain from disclosing your Personal Data to any unauthorised third party.
- Upon the termination of our agreement with the Subprocessor, delete or return your Personal Data at our direction.

Additional information about the Sub-processors Greenomy uses to support delivery of our Services is set forth in our [list of Subprocessors](#).

## 15. Contact

**If you have any questions about this Privacy Policy or our treatment of your Personal Data, please write to our Data Protection Officer (“DPO”) by email or by post to the following address:**

**Data Protection Officer**

**Greenomy SRL**

**Avenue Louise 54 - 1050 Brussels, Belgium**

**[privacy@greenomy.io](mailto:privacy@greenomy.io)**

## 16. Modification of the Privacy Policy

**We may update this Privacy Policy from time-to-time by posting a new version on our Website. All changes are effective immediately upon communication. We encourage you to occasionally check this page to ensure you are happy with any changes to the Privacy Policy.**

**Material modifications will be subject to notification by Greenomy by Website notice, email or any other form of communication.**

#### 17. Definitions

**Any capitalised term used herein will have the meaning ascribed to it under this Section.**

Term	Definition
<b>Greenomy's Affiliate</b>	Any person, corporation, or other entity which, directly or indirectly, controls, is controlled by or is under common Control with Greenomy at any point in time.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

<b>Greenomy</b>	Greenomy SRL, a limited liability company, incorporated under the laws of Belgium, having its registered office and principal place of business at Avenue Louise 54, 1050 Brussels, Belgium.
<b>Greenomy Academy</b>	Greenomy educational platform: <a href="https://academy.greenomy.io">https://academy.greenomy.io</a>
<b>Greenomy Career</b>	Greenomy recruitment portal: <a href="https://careers.greenomy.io">https://careers.greenomy.io</a> .
<b>Personal data</b>	Information relating to an identified or identifiable natural person pursuant to the GDPR.
<b>Platform</b>	All-inclusive reference to the software developed by Greenomy, including: the Portals, APIs and any integration or add-on functionalities.
<b>Services</b>	An all-inclusive reference to the Services provided by Greenomy, including: Website, Greenomy Academy, Platform, Webinar, etc.

<b>Trust Portal</b>	Greenomy trust platform: <a href="https://trustportal.greenomy.io">https://trustportal.greenomy.io</a> .
<b>User</b>	The individual using our Services. The User corresponds to the subject of Personal Data.
<b>Website</b>	Greenomy website: <a href="https://greenomy.io">https://greenomy.io</a> .
<b>Webinar</b>	Greenomy webinars.