

Faqbot – Privacy Policy

The following Privacy Policy governs the processing of Personal Data by FAQBOT SC/SA, with registered offices at 7030 Saint-Symphorien, Chaussée du roi Baudouin 153, a company listed in the Belgian Trade and Companies Register under number 0670.656.812 (hereafter “**FAQBOT**”, “**we**”, “**us**” or “**our**”).

FAQBOT provides services to website holders (“**Clients**”) in the form of an artificial intelligence steered chatbot allowing the customers of such Clients to easily receive and retrieve information usually enclosed in the frequently asked questions section of the Client’s website (“**Chatbot-Services**”).

1. General provisions

FAQBOT cares about the privacy of the users of its Services and all others whose Personal Data it may collect in the exploitation of its business (hereafter “**User**” or “**you**” or “**your**”) and will only collect and process your Personal Data in accordance with the provisions of this Privacy Policy.

The purpose of this Privacy Policy is to specify which categories of Personal Data FAQBOT collects through its business activities and its website (www.faqbot.co), subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (collectively referred to as “**Services**”). It also describes how, and for which purposes such data will be processed and, where applicable, may be disclosed to others. The Privacy Policy further sets out the different measures FAQBOT has implemented to safeguard the security and confidentiality of the Personal Data it collects.

For the purpose of this Privacy Policy, FAQBOT is to be considered the controller of the Personal Data it collects and processes. However, please note, that FAQBOT is not considered the controller of Personal Data when merely providing its Chatbot-Services to its Clients. In such circumstances, it will be the Client who will be acting as the controller and FAQBOT shall act as its processor. Please read the Client’s privacy policy to learn how your information is processed by the Client.

When processing Personal Data, either as a controller or processor, FAQBOT shall act in accordance with the provisions of all applicable data protection legislation, among which,

- (i) the Belgian Act of 30th July 2018 on the protection of individuals in relation to the processing of Personal Data,
- (ii) the Act of June 13th. 2005 on the electronic communication,
- (iii) the General Data Protection Regulation (Regulation (EU) 2016/679),

and all other data protection laws in force in the EEA member states, each as applicable, and as amended or replaced from time to time, including by administrative and judicial interpretations (“**Applicable Data Protection Legislation**”).

FAQBOT will not collect any sensitive Personal Data. This includes data such as data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation from Users. FAQBOT will, if necessary, obtain your explicit consent to collect such sensitive Personal Data.

FAQBOT does not knowingly collect Personal Data from children under the age of thirteen (13) without the proper parental consent. If you are a parent or guardian of a child under the age of thirteen (13) using our Services, please send us an e-mail to hey@faqbot.co to view the information provided by the child and require it to be deleted.

Should you have any questions about this Privacy Policy or have the feeling that your interests are not or inadequately represented, you can contact us via email: hey@faqbot.co.

2. Personal Data processed by FAQBOT

“**Personal Data**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The categories of Personal Data which can be processed while using the Services or while communicating with FAQBOT are set out hereunder.

2.1. Data relating to our business relations

When you contact us or communicate with us, we will collect whatever information you volunteer, including your name and surname, your address and email address, etc.

2.2. Personal Data from your visits and usage of our Services

When you interact with our Services, including a user area of our website, we collect the information that you choose to share with us such as a unique username, a password, your name and surname, a professional email address, a phone number, etc.

2.3. Data relating to your subscription to the Chatbot-Services

When you subscribe to a subscription plan relating to the Chatbot-Services, you will be required to provide certain information relating to the billing of such Chatbot-Services, such as your name, surname, bank account number, etc.

2.4. Behavioural information

We collect certain information relating to your behaviour when making use of our Services, such as details about how you used our services, access times, pages viewed in the Services, pages you visited before and after accessing our servers.

2.5. Technical Information

We collect technical information relating to your usage of our Services, including data we collect from and about the devices you use, such as hardware specifications and models, unique device identifiers, software specifications, operating systems, unique application identifiers, browser types, languages

We additionally receive and process information regarding your wireless and mobile network connections, including your mobile number, service provider, signal strength, and IP address.

2.6. Cookies

Like most online services, we use cookies and other technologies, such as pixels, web beacons, web storage, and unique advertising identifiers, to collect information, including the aforementioned categories of Personal Data, about your activity, browser, and device. To learn more about how we use cookies and your choices, please check out our Cookie Policy.

3. How we use your Personal Data

3.1. Client access to the Client section of the Services

We collect and process your Personal Data for the purpose of granting Clients access to our services via the Client section of the Services, allowing us to communicate service-specific notifications to our Clients, identify the Client when accessing the Client section of the services and for the purpose of allowing the Client to manage its use of the Chatbot-Services.

The processing of Personal Data for this purpose is **based on the execution of the subscription contract** concluded by the Client with us.

3.2. Client- and lead-specific communications

We collect and store your Personal Data for the purpose of communicating with you in relation to the services you order or may have ordered from FAQBOT. These communications may contain, among others, specific information relating to our services and general communications in relation to the services ordered by you or general information you may have requested.

The communications may be sent via e-mail or by other mail services, as may be required for the successful communication of the content.

These communications will be sent **based on our legitimate interest**.

3.3. Processing of payments and subscriptions

We collect and process your Personal Data for the purpose of managing your subscription to the Chatbot-Services and the fees due in relation to such subscription.

The Personal Data is processed in this case, **based on the subscription contract** you conclude with us in order to benefit from such subscription to the Chatbot-Services.

3.4. Engagement and marketing

We collect and store your Personal Data for the purpose of communicating marketing materials relating to the Services offered by FAQBOT, specific offers for Services offered by FAQBOT, and general communications in relation to the services.

The communications may be sent via e-mail or by other mail services, as may be required for the successful communication of the content by us.

These communications will be sent to you based on **our legitimate interest** to keep you informed of our Services and related developments.

FAQBOT ensures for its marketing activities to comply with the applicable legislation and it will obtain, where required, the necessary consents before the User receives any emails or other electronic communication from FAQBOT or one of its partners. You can demand at any time to stop the sending of such information by clicking on the unsubscribe button in the received electronic communication.

3.5. Service development, updates, and security

We collect and process technical data based on **our legitimate interest** to deliver and improve our Services in relation to you. This Personal Data is additionally processed and stored for the purposes of detecting and preventing unauthorised system access and ensuring system security.

4. The User's rights

Under the Applicable Data Protection Legislation, you are entitled to exercise certain rights in relation to the Personal Data we store and process on you, free of charge.

You can exercise your rights by sending an email to hey@faqbot.co. Your request should clearly state and specify which right you wish to exercise.

The exercise of your rights is free of charge and will be executed within one (1) month of the receipt of your request to exercise your rights. This delay may be extended with an additional two (2) months for a total delay of three (3) months, should your request prove to be particularly complex. If we decide to extend the delay, for any reason, you will always be informed of this decision in due time.

4.1. [Withdrawal of consent](#)

You have the right to withdraw your consent at any time where you have previously given us your consent for such processing. Withdrawing your consent will not impact the validity of the lawful processing activities performed on your Personal Data before exercising your right of withdrawal.

4.2. [Right of access](#)

You are entitled to request a copy of the data we process and hold on you. If we process and/or hold Personal Data about you, you will receive a copy of the information in an understandable format together with an explanation of why and how we hold and use it.

Additionally, you can ask to receive information regarding the recipients or categories of recipients to whom your Personal Data has been disclosed, including any recipients from third countries, meaning countries outside the EEA. For the Personal Data sent to third countries, you will be entitled to receive information regarding the appropriate safeguards we have taken in order to ensure the secure processing of your data. For more information regarding the transfer of your Personal Data to third parties and/or third countries, we refer to the relevant sections below.

4.3. [Right to rectification](#)

You have the right to ask us to correct your Personal Data. This includes the right to have us correct spelling mistakes, change an address, email addresses, phone numbers, etc.

Additionally, you have the right to complete any incomplete information we process or hold on you in the Client section of the Services.

4.4. [Right to erasure](#)

You have the right to request the deletion of the Personal Data we process or hold on you, including your access information, necessary in order to access the User section of the Service.

We can object to the deletion if the processing of your data is on the basis of a contract or is necessary for the exercise of our freedom of expression or information, to comply with legal obligations, for reasons of public interest or for the establishment, exercise or defence of legal claims.

4.5. Right to restrict the processing

You have the right to restrict our processing of your Personal Data. Please note that in exercising this right the relevant Personal Data will remain in our possession, but we will not be able to further process it.

4.6. Right to object to the processing

In those cases where we process and collect your Personal Data based on our legitimate interest, you have the right to object to our processing of such data. Please note that if you decide to exercise your right to object to our processing of your Personal Data, we have the right to provide you with our legitimate grounds in order to continue the processing of your data. Our decision to continue the processing of your Personal Data does not preclude you from filing a complaint with the relevant supervisory authority as set out further below.

4.7. Right to data portability

You are entitled to receive the Personal Data we process or hold on you in a structured, commonly used, and machine-readable format. Furthermore, you have the right to have these Personal Data transmitted to another data controller, unless we consider this action not to be technically feasible.

5. Retention period

Your Personal Data is only processed for as long as needed to achieve the purposes which are described above in section 3. In this section, we provide you with the information you need to assess how long we will keep your Personal Data identifiable.

All Personal Data we collect through our interactions with you via the Services, the User area of the Services, phone, e-mail, and other digital communication channels, we keep for as long as required to communicate with you, but also to keep a historical archive of our communications. This allows us to revert back to earlier communications if you return to us with new questions, requests, remarks, or other input.

As a general rule, we will de-identify or delete your Personal Data when they are no longer necessary for the purposes outlined above or when the retention period as explained in this section has expired. Unless explicitly named in this section 6, when determining the relevant retention periods, we will consider the following factors, including:

- (i) our contractual obligations and rights in relation to the information involved;
- (ii) legal obligations under the applicable law to retain data for a certain period of time;

- (iii) statute of limitations under applicable law(s); our legitimate interest, where we have carried out a balancing test; and
- (iv) any relevant guidelines provided by the relevant data protection authorities.

With a maximum of ten (10) years.

Processing activity	Retention period
Client access to the Client section of the Services	For as long as you do not delete your account from our Services and maximum ten (10) years after your last activity after not being subscribed to the Chatbot-Services.
Client- and lead-specific communications	For as long as you remain subscribed to our Chatbot-Services and maximum ten (10) years thereafter.
Processing of payments and subscriptions	For as long as you remain subscribed to our services and maximum seven (7) years thereafter.
Engagement and marketing	For as long as you do not unsubscribe from our Services and maximum two (2) years from your last access to our Service.
Service development, updates and security	For a duration of maximum ten (10) years.

6. Disclosure of Personal Data to third parties

Although FAQBOT may transfer minimal, and only such Personal Data as may be necessary for the fulfilment of the specific service to service providers, acting as processors who process data in its name, FAQBOT will not sell or share data with third parties for secondary or unrelated purposes unless otherwise expressly stated when collecting the particular Personal Data.

To receive an updated list of our processors and other third parties, including the agreements we have in place with them for the safe transfer of your Personal Data, please contact us by sending us an e-mail to hey@faqbot.co.

If FAQBOT gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of our business to another company, we may share your information with that company before and after the transaction closes.

Where appropriate or required, FAQBOT will be entitled to transmit Personal Data to law enforcement authorities, regulatory or other government agencies, or third parties where

necessary or desirable to comply with legal or regulatory obligations or in the context of the above-mentioned purposes.

7. Third-Party links and websites

Please note that the Services may contain links to other websites digital platforms or Internet resources which may collect Personal Data voluntarily, via cookies or similar technologies. FAQBOT bears no responsibility, liability for, or control over those other websites or internet resources or their collection, use and disclosure of your Personal Data. FAQBOT recommends you review the privacy policies of those other websites and internet resources to understand how they collect and use your Personal Data.

8. International data transfers

FAQBOT will not transfer any Personal Data to countries which do not have data protection laws equivalent to those in force in the European Economic Area.

For the processing of your Personal Data, FAQBOT engages the services of the Swiss based entity called [Infomaniak](#) with which the necessary agreements have been concluded in order to safeguard the secure transfer, storing and management of your Personal Data including by guaranteeing the necessary technical and organizational measures.

Infomaniak acts as the processor of the Personal Data shared to it by FAQBOT and assures the necessary compliance of its data processing in regard to the Applicable Data Protection Legislation. We furthermore wish to point out that Switzerland has been subject to an adequacy decision from the European Commission.

To receive an updated list of our processors and other third parties, including the agreements we have in place with them for the safe transfer of your Personal Data, please contact us by sending us an e-mail to hey@faqbot.co.

9. Security of data

FAQBOT takes all reasonable and appropriate technical and organisational measures to protect the security, confidentiality and integrity of your Personal Data. In particular, FAQBOT will take appropriate measures to prevent any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data.

These measures are under constant revision and will be updated regularly in order to provide the necessary guarantees.

10. Complaints

The Applicable Data Protection Legislation allows you to file a complaint with your local supervisory authority (depending on your place of residence, your place of employment or

the place of infringement on the Applicable Data Protection Law) or with the lead Supervisory Authority; in this case being the Belgian Data Protection Authority.

To contact the Belgian Data Protection Authority you can send them a letter or an e-mail using the following addresses: Rue de la Presse 35, 1000 Brussels - email: contact@apd-gba.be.

However, we would appreciate it if, prior to filing any complaint, you contact us in order for us to assist you however possible with your requests or concerns.

11. Changes and Amendments

We may update this Privacy Policy from time to time. But when we do, we'll let you know one way or another. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available on our Websites or through our applications or other tools. Other times, we may provide you with additional notice (such as adding a statement to our Website's homepage or providing you with an email notification). Modified versions will have an immediate effect unless stated otherwise.

12. Competent Court and Applicable Law

This Privacy Policy shall be governed by - and construed in accordance with - the Belgian legislation.

The competent courts for disputes regarding this Privacy Policy will be the courts of Mons, unless otherwise imposed by mandatory statutory provisions.