

E-LIA PRIVACY POLICY

May 26, 2025

At E-lia, we value your privacy. We process personal data exclusively in accordance with the General Data Protection Regulation (GDPR). This privacy policy explains what data we process, for what purpose, how we protect it, and what rights you have.

This policy applies to the use of the Web Application of E-lia B.V., located at Tommaso Albinonistraat 7, 1083 HM Amsterdam, registered with the Dutch Chamber of Commerce under number 84016833 ("E-lia").

By using our Web Application, you agree to this privacy policy.

1. What personal data do we process?

To provide our services through the Web Application effectively, we process personal data of both end users and administrators.

For end users, we process:

- First and last name
- Email address or phone number

These details are either entered by the administrator or automatically synced via an integration. Processing occurs only on a valid legal basis, such as consent or legitimate interest.

For administrators, we process:

- First and last name
- Email address
- Phone number

2. Purpose of processing

We process personal data solely to:

Grant end users access to modules and content within E-lia

- Register user progress
- Provide administrators with access to the dashboard
- Enable and improve the technical delivery of our services

Without this data, we cannot provide our services properly.

3. Data storage and processing

All personal data is encrypted and stored in our database on secure servers located in the Netherlands. Data is processed exclusively within the European Economic Area (EEA).

We never share personal data with third parties for commercial purposes. Data is only shared with parties essential to the technical functioning of the service, under GDPR-compliant conditions.

E-lia enters into a data processing agreement with each customer. Customers can choose between E-lia's standard agreement or their own version, provided it meets applicable requirements. E-lia guarantees compliance in both cases.

4. Security and hosting

The Web Application is hosted, managed, and secured by LICO Innovations B.V., an external partner certified under ISO 27001.

All personal data is encrypted and stored in a secure Dutch data center. Only authorized staff with a user account have access to this data.

5. Use of WhatsApp

E-lia uses the WhatsApp Messaging API to communicate with end users.

Messages sent via WhatsApp are end-to-end encrypted, meaning only the sender and recipient — i.e., E-lia and the respective user — can read them. WhatsApp (Meta) itself cannot access this content.

When a WhatsApp chat is initiated via the platform with a user registered by phone number. Since the user is already active on WhatsApp, the number is already known to Meta. E-lia does not share any new or additional data with WhatsApp.

The technical process is as follows: E-lia uses the WhatsApp Messaging API to send a message. WhatsApp sends back "callbacks" to confirm delivery or read status. These are linked to phone numbers, not names. E-lia then links the number to a user in its database and records the activity.

If a user opts for communication via email instead of WhatsApp, only the email address is used, and no information is shared with third parties.

More information on WhatsApp's privacy policy is available via the links below:

- WhatsApp Privacy Policy
- EU User Updates

6. Information security and business data protection

E-lia provides a working environment that complies with current privacy and security standards, including the GDPR. Only registered administrators have access to platform data.

Although WhatsApp communication is secure, it remains essential for organizations to set internal guidelines for handling confidential information. Staff are individually responsible and usually bound by confidentiality obligations.

Note: Content from e-learning modules can still be recorded or shared via alternative means. Internal awareness and careful user behavior remain essential.

7. Automated decision-making

E-lia does not use automated decision-making that affects users without human involvement.

8. Data retention

End user personal data is deleted no later than 30 days after discontinuing use of E-lia. Administrator data is deleted once the account is deactivated, unless a statutory retention period applies.

Billing data is retained in accordance with legal tax requirements (typically 7 years).

9. Data subject rights

As a data subject, you have the following rights:

- Access to your personal data
- Explanation of how and why we use your data
- Correction of inaccurate data
- Deletion of outdated or unlawfully processed data
- Data portability
- Withdrawal of consent
- Objection to certain types of processing
- To exercise your rights, please contact us using the details below. Always provide enough information so we can verify your identity.

10. Complaints

If you have a complaint about how we handle your personal data, please contact us first. If we cannot resolve it together, you have the right to lodge a complaint with the supervisory authority:

Autoriteit Persoonsgegevens - www.autoriteitpersoonsgegevens.nl

11. Changes to this privacy policy

We reserve the right to amend this privacy policy. The most recent version is always available on our website. If changes significantly affect your data, we will notify you, for example by email or through the Web Application.

12. Contact

E-lia B.V.

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