

## Privacy Policy

**Effective Date:** 01-01-2026

**Last Updated:** 01-01-2026

### 1. Who We Are

Hillysoft

Dunantstraat 1293, 2713TR, Zoetermeer, The Netherlands

Email: [info@hillysoft.com](mailto:info@hillysoft.com)

KvK Number: TODO

### 2. What Data We Collect

- **Account and Organization Data:** Company name, department, address, VAT number, billing reference, account holder's name, role, email, phone, delegated contacts
- **Subdomain Allocation:** Based on email domain; discoverability risk mitigated
- **External Contact Data:** Occasionally received from external sources; processed under legitimate interest
- **Technical and Usage Data:** IP address, browser type, device info, usage patterns

### 3. Legal Basis for Processing

- Contractual necessity

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- Consent (where applicable)

### 4. How We Use Personal Data

- Account creation and management
- Access provisioning and billing
- Security and performance improvements
- Continuity outreach (max twice per year)
- No third-party advertising

### 5. Data Sharing

No sale of personal data. Shared only with processors (hosting, payments, escrow) or legal authorities when required.

### 6. International Transfers

Safeguarded via Standard Contractual Clauses or equivalent mechanisms.

### 7. Data Retention

Retained only as long as necessary or legally required.

## Privacy Policy

### 8. Your Rights

- Access, rectification, erasure
- Restriction, objection, portability
- Withdraw consent

Contact: [privacy@hillysoft.com](mailto:privacy@hillysoft.com)

### 9. Security Measures

- Encrypted backups
- Role-based access controls
- Rate limiting and anomaly detection
- Subdomain obfuscation

### 10. Changes to This Policy

We may update this Privacy Policy. Significant changes will be communicated via email or in-app notification.