

Docbyte Policies & Procedures

Docbyte Privacy Policy

V6.0

OID: 1.3.6.1.4.1.59389.2.2.6.6.0

14/01/2025

www.docbyte.com



Legal Notice

Copyright © 2025 Docbyte NV All Rights Reserved

Docbyte NV
Kortrijksesteenweg 1144B, 9051 Gent, Belgium
info@docbyte.com
www.docbyte.com



Document Version History

Version	Date	Description	Author
0.1	10/05/2019	Initial document	Tom De Cubber
0.9	14/05/2019	Approval by Docbyte DPO	Annelore Lenoir
0.91	04/05/2020	Yearly Review	Tom De Cubber
1.0	28/05/2020	Board Approval	Tom De Cubber
1.1	10/12/2020	Yearly Review, Schremms II added	Tom De Cubber
2.0	14/12/2020	Board Approval	Tom De Cubber
2.1	25/05/2021	Yearly Review	Tom De Cubber
3.0	28/05/2021	Board Approval	Tom De Cubber
3.1	14/01/2022	Yearly Review	Tom De Cubber
4.0	21/02/2022	Board Approval	Tom De Cubber
4.1	21/03/2023	Yearly Review	Tom De Cubber
4.2	24/03/2023	Content discussion with DPO	Tom De Cubber
5.0	27/03/2023	Execute Committee Approval	Tom De Cubber
5.1	26/02/2024	Yearly Review	Tom De Cubber
5.2	29/02/2024	Content discussion with DPO	Tom De Cubber
6.0	04/03/2024	Executive Committee Approval	Executive Committee
6.1	07/01/2025	Review in collaboration with DPO	Paul Henon
7.0	14/01/2025	Executive Committee Approval	Executive Committee



TABLE OF CONTENTS

1 INTRODUCTION	5
2 DOCUMENT REVIEW AND APPROVAL	6
3 SCOPE.....	7
3.1 WHAT PERSONAL DATA DOES DOCBYTE USE	8
3.2 HOW WILL DOCBYTE USE YOUR PERSONAL DATA.....	8
3.3 HOW DOES DOCBYTE STORE YOUR PERSONAL DATA	9
3.4 CHANGES TO THE DOCBYTE PRIVACY POLICY.....	9
3.5 HOW TO CONTACT DOCBYTE	10
3.6 HOW TO CONTACT THE APPROPRIATE AUTHORITIES	10
4 CLOUD PROVIDER COMPANIES OR SUB CONTRACTORS AND THEIR GDPR ALIGNMENT	11
4.1 INTRODUCTION.....	11
4.2 AMAZON WEB SERVICES	11
4.3 MICROSOFT AZURE	11
4.4 GOOGLE CLOUD	12



1 Introduction

This document is written in order to give our customers and prospects the necessary information so they can be sure Docbyte services Personal data processing is all done in alignment with the GDPR regulations.

In every solution provided, Docbyte will only work as a Processor - the originator of the data always remains Data Controller or Data Processor depending on its role in the chain of processing.

As Docbyte uses some external service providers in parts of its solution, this policy document will also contain excerpts from the GDPR documentation of these service providers which guarantee their fulfillment of the GDPR regulations.

In case of any doubt, please feel free to address your questions to your contact person at Docbyte so we can resolve the issue in the shortest possible time.

Within this document, "Controller", "Processor", "Data Subject", "Personal Data", "Processing" shall have the same meanings as in the Data Protection Legislation and "Processed" and "Process" shall be construed in accordance with the definition of "Processing".



2 Document Review and Approval

This document can only be used after review and approval by the Docbyte DPO and Docbyte management as stated in the GDPR rules¹.

The document is prepared and presented for review to the Docbyte DPO by the field experts. Only after explanation of all parts to the DPO by the field experts and approval by the DPO, this document will go to the management board for final approval. Only after final approval has been given by the management board, this document can be considered legitimate.

Approved versions will always get a new major version number together with the explicit mention of approval.

¹ <https://www.gdpreu.org/the-regulation/key-concepts/data-protection-officer/>



3 Scope

This privacy policy will explain how Docbyte uses the Personal Data that will be processed when you, as a customer, use the Docbyte/Docbyte Cloud services for your data processing applications.

This document is only intended to cover processing of Personal Data, all non-personal data processing is out of scope for this document. From this point on and further in this document, when we use the terms “Data” or “Personal Data” we consider them as a reference to “Personal Data”.

Docbyte will always act as a Data Processor in every case where data will be processed and/or stored on the Docbyte infrastructure and solutions. These data will never have Docbyte as the Data Controller.

The topics we will cover in this scope are

- What Personal Data does Docbyte use
- How will Docbyte use your Personal Data
- How does Docbyte store your Personal Data
- Changes to the Docbyte privacy policy
- How to contact Docbyte
- How to contact the appropriate authorities



3.1 What Personal Data does Docbyte use

When using the Docbyte Services, Docbyte can only use the Personal Data as delivered by the customer as part of the call to the service.

This way, the customer knows exactly what Personal Data will be transferred to Docbyte for data processing purposes.

There is no other mechanism to gather additional Personal Data outside this well-defined scope.

3.2 How will Docbyte use your Personal Data

The Personal Data Docbyte receives will only be used as input for the processing service you, as a customer, mention in your API call. Personal Data will remain inside the processes used and may be exchanged between the micro services of which the composed service/process exists. Once the processing has been done, the Personal Data is returned to the originator and only if there is an explicit step in the agreed upon process, Docbyte will store the Personal Data in a secure way. If no such agreement exists, all Personal Data will be securely removed from the Docbyte processing chain once the processed data have been returned to the originator.

Personal Data will not be exchanged with (parts of) other processes if these are not defined as part of the primary process where the Personal Data has been sent to.

Moreover, Docbyte will never process the Personal Data or disclose or permit the disclosure of the Personal Data to any Third Party other than:

- in accordance with Customer's documented instructions.
- where required by clear, unambiguous provisions or arrangements in EU or Member State Law to which Docbyte is subject, in which case Docbyte shall inform customer of that legal requirement before Processing that Personal Data, unless that Law prohibits such information being provided on important grounds of public interest.



3.3 How does Docbyte store your Personal Data

Only in case there is an absolute need to store Personal Data (be it temporarily or on the longer term), the Data will be stored on an encrypted disk where only Docbyte administrators and processes can define (administrators) and use (processes) the encryption keys (cfr Cryptography Policy for more details).

As Docbyte uses European regions to process and, where appropriate, store Personal Data, we can guarantee that Data will only be kept inside the European Economic Area. If for any reason Personal Data needs to be moved outside the European Economic Area, all of our suppliers (sub processors) have signed EU Model Contract Clauses², which is at this moment considered OK to comply with the Schremms II judgement³.

In case we have an exchange of Personal Data between customer and Docbyte, we can enable enlisted Docbyte people (as agreed upon with customer) access to the Personal Data.

3.4 Changes to the Docbyte privacy policy

In case there is a need to update the Docbyte privacy policy, the changes will be discussed and entered into this document by Docbyte field experts after which explanation to the DPO and explicit approval has to be done as explained in Section 2.

² https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/new-standard-contractual-clauses-questions-and-answers-overview_en

³ https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/new-standard-contractual-clauses-questions-and-answers-overview_en - Local law and governments access – 40. Are any specific steps needed to comply with the Schremms II judgment when using the new SCCs? Is it still necessary to take into account the guidance of the EDPB?



3.5 How to contact Docbyte

If you have any questions about Docbyte's privacy policy, the Personal Data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

- Write us at:

Annelore Lenoir - Docbyte DPO
Docbyte NV
Kortrijksesteenweg 1144
BE - 9051 Gent
Belgium

- Call us at:

+32 9 242 87 30

- Mail us at:

gdpr@docbyte.com

3.6 How to contact the appropriate authorities

Should you wish to report a complaint or if you feel that Docbyte has not addressed your concern in a satisfactory manner, you may contact the Data Protection Authority via the website <https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen> (Dutch) or <https://www.autoriteprotectiondonnees.be/introduire-une-requete-une-plainte> (French)



4 Cloud Provider companies or Sub contractors and their GDPR alignment

4.1 Introduction

All of the Cloud provider companies discussed in this chapter are considered as Data Processor for Docbyte and Docbyte Cloud.

All of the Cloud provider companies Docbyte works with all have been certified with

- ISO27001 for Information Security Management
- ISO27017 for Cloud Security
- ISO27018 for Cloud Privacy
- ISO27701 as data privacy extension to ISO27701

4.2 Amazon Web Services

All AWS services are GDPR ready⁴ as stated by the Cloud provider on its GDPR center.

Furthermore, there is a formal part in the terms of use between Docbyte and AWS that Personal Data are only stored within the region chosen⁵ by Docbyte. There will be no Personal Data movement outside the region except if Docbyte itself takes the initiative (which will of course not be the case except for possible replication inside Europe). This way Docbyte can guarantee Personal Data processed via AWS remains in Europe.

4.3 Microsoft Azure

Microsoft Azure is fully aligned with the GDPR rules as explained in its Trust Center⁶.

Concerning Personal Data storage, Microsoft Azure provides documentation⁷ that explains how data are replicated across regions inside the EU Data Boundary,

⁴ <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>

⁵ <https://aws.amazon.com/compliance/data-privacy-faq/> - Storage bullet point

⁶ <https://www.microsoft.com/en-us/trust-center/privacy/gdpr-overview>

⁷ <https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-learn>



explaining how data stored in Europe always remain in Europe as they are only copied between data centers in Europe.

This way Docbyte can guarantee Personal Data processed via Azure remains in Europe.

4.4 Google Cloud

Google Cloud is GDPR compliant as explained in its GDPR statement on its site⁸.

Concerning Personal Data location, there is no explicit mention by Google that all Personal Data always remain in Europe if you start processing them on a European location. However, in alignment with the GDPR general rules, Google complies with all international regulations for secure and correct international Personal Data transfer as also confirmed by the European Data Protection Authorities (screenshots taken from the referenced web page earlier in this Google Cloud paragraph).

This way Docbyte can guarantee Personal Data processed via Google remains in Europe or if any transfer outside Europe is done this is done via a process that has been approved by the European Data Protection Authorities

INTERNATIONAL DATA TRANSFERS

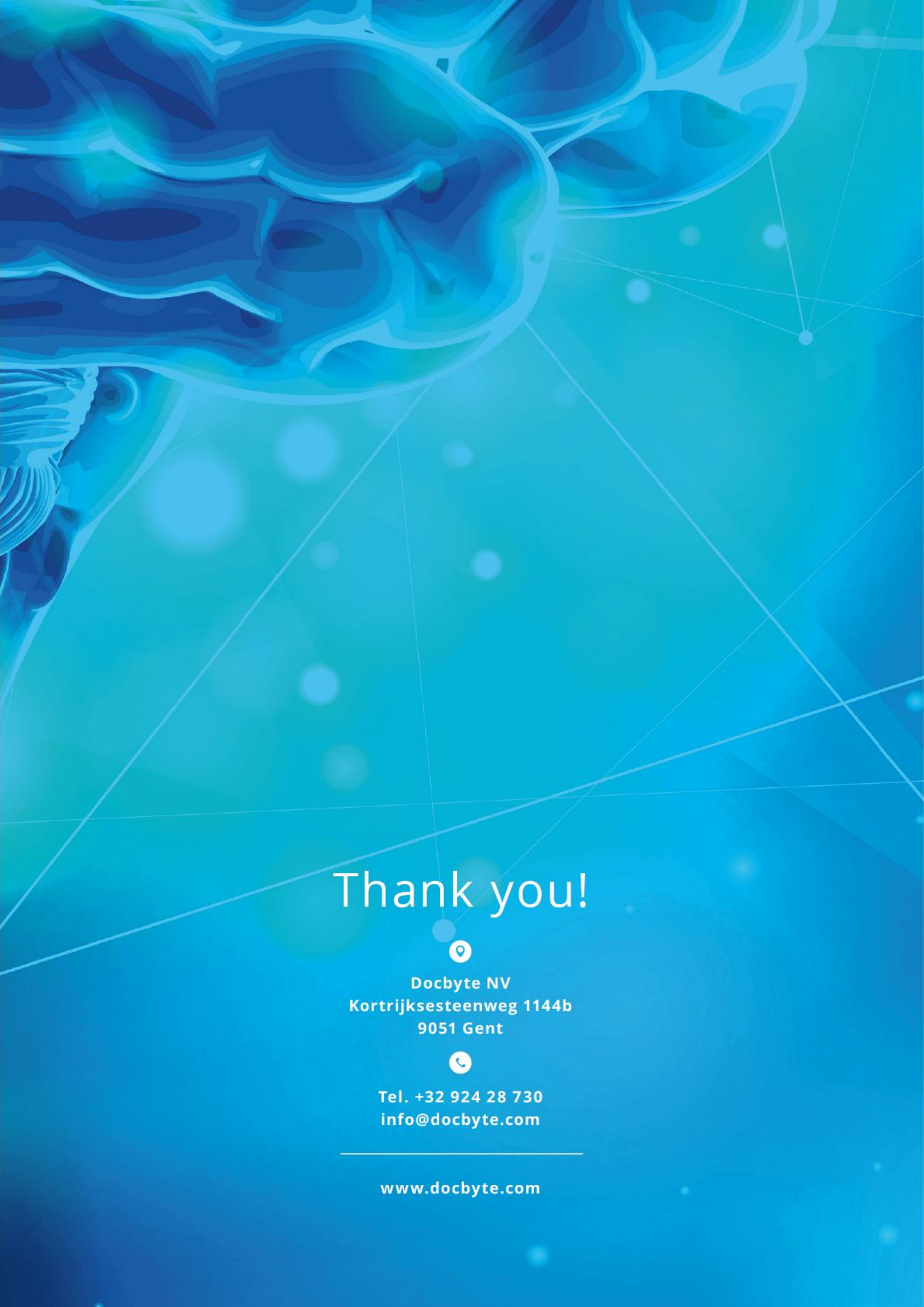


The GDPR provides for several mechanisms to facilitate transfers of personal data outside of the EU. These mechanisms are aimed at confirming an adequate level of protection or ensuring the implementation of appropriate safeguards when personal data is transferred to a third country.

An adequate level of protection can be confirmed by adequacy decisions such as the ones that support the Japanese Act on the Protection of Personal Information (APPI) and the Swiss Data Protection Act.

Where personal data will be transferred outside of the EU to third countries not covered by adequacy decisions, we commit under our data processing agreements to maintain a mechanism that will facilitate these transfers as required by the GDPR. In 2017, we gained confirmation of compliance from European Data Protection Authorities for our standard contract clauses, affirming that our contractual commitments for Google Workspace and Google Cloud met the requirements to legally frame transfers of personal data from the EU to the third countries that do not provide adequate protection.

⁸ <https://cloud.google.com/privacy/gdpr>



Thank you!



Docbyte NV
Kortrijksesteenweg 1144b
9051 Gent



Tel. +32 924 28 730
info@docbyte.com

www.docbyte.com