Privacy Statement of mBino Services

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This is a translation. In case of differences, the Dutch text prevails.

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In this privacy statement we explain which personal data mBino Services processes, why, for how long, with whom we share it and what rights you have. It applies to mBino Services and the KEOR brand, and to our websites, such as www.mbino.com, www.keor.cloud and keorpos.cloud. It replaces the privacy statement of 15 December 2014.

1. Who we are

mBino Services
Economiestraat 12, 6135 KV Sittard, the Netherlands
Kamer van Koophandel (Chamber of Commerce) 14131139 · VAT NL001203540B09
Email: info@mbino.com · telephone +31 46 781 00 00

You can contact us at this address with questions about privacy. We do not have a data protection officer; this is not mandatory for an organisation such as ours.

2. Two roles: controller and processor

We are the controller for the data we process for ourselves: of visitors to our websites, of people who contact us, and of our customers, suppliers and their contact persons. This privacy statement applies to that data.

We are a processor when we process data on behalf of a customer. This is the case with KEOR (the hotel or restaurant decides which data of guests and employees it records), with hosting and email, with guest portals of Wi-Fi networks, with telephony and with IT management. In those cases our customer is the controller, and we follow its instructions under a data processing agreement. If you are a guest, employee or visitor of one of our customers and have a question about your data, please contact that customer first. We are happy to help them answer your question.

You can read more about the apps KEOR Guest and KEOR PMS Staff at www.keor.cloud/en/app-privacy/, and about the app KEOR POS at keorpos.cloud/privacy.

3. What data we process and why

Who	What data	For what purpose	Legal basis
Visitors to our websites	IP address, browser, pages visited and time (in server logs and at Cloudflare)	Making the websites work and securing them against misuse	Legitimate interest
People who fill in the contact or demo form or email or call us	Name, company, email address, telephone number, your message and, for KEOR, the number of rooms	Answering your question, preparing a demo or quotation	Legitimate interest, or steps taken at your request prior to entering into a contract
Customers and their contact persons	Name, company details, address, email, telephone, job title, VAT and Chamber of Commerce (KvK) number, bank details, orders, invoices and payments, correspondence	Performing the contract: supplying, installing, supporting, invoicing and collecting payment	Performance of a contract
	Invoice and payment data	Our statutory retention obligation	Legal obligation
Users we support remotely	Name, device, time and duration of the session, and what is visible on the screen during the session	Remote support and management, and being able to verify who had access when	Performance of a contract and legitimate interest
Suppliers and partners	Name, contact details, company details and correspondence	Cooperation, purchasing and administration	Performance of a contract

We occasionally send customers information about our own similar products and services, such as new features of KEOR. You can always unsubscribe from this. We do not send newsletters to non-customers without your consent.

We do not use your data for automated decisions that significantly affect you, and we do not sell it.

4. Cookies

Our websites do not use analytical cookies, advertising cookies or social media trackers. Only on the contact page do we place a functional session cookie, to protect the form against misuse. It disappears when you close the browser. No consent is required for this.

5. With whom we share data

We only share data where necessary for the purposes above, with:

- **hosting and network**: our servers, including those for the websites and for remote support, are located in Contabo data centres in Germany. Traffic to keor.cloud and keorpos.cloud is routed via Cloudflare for security. For mbino.com, Cloudflare only provides the domain name servers (DNS) and does not see any visitor traffic;
- **email**: email is sent via our own mail server;
- **our accountant**, for the accounts and tax returns;
- **suppliers and manufacturers**, where necessary for the delivery, warranty or support of a product you purchase from us;
- **government authorities**, where the law requires us to do so.

We have made arrangements on security and confidentiality with parties that process data on our behalf.

6. Data outside the European Union

We process data within the European Union as far as possible. Cloudflare is an American company. Cloudflare is certified under the EU-US Data Privacy Framework and also offers the standard contractual clauses of the European Commission. This ensures an adequate level of protection.

7. How long we keep data

Data	Retention period
Enquiries via the contact form, email or telephone that do not lead to a contract	Up to one year after the last contact
Data of customers and their contact persons	For as long as the customer relationship lasts, and thereafter up to two years for any questions or warranty

Data	Retention period
Invoices, payments and other data subject to a tax retention obligation	Seven years, as prescribed by law
Log files of our websites	Thirty days, unless the law prescribes a longer period or we need them to investigate an incident
Log files of remote support	One year (365 days), so that we can verify who had access when, unless the law prescribes a longer period or we need them to investigate an incident

8. Security

We take appropriate technical and organisational measures to protect your data. Connections are encrypted (HTTPS). Access to systems is limited to the people who need it, with two-factor authentication where possible. We store sensitive data encrypted. We store passwords only as a hashed value. If you notice anything that points to a security problem, please report it to info@mbino.com.

9. Your rights

You have the right to:

- access your data;
- have incorrect data corrected;
- have your data erased, unless we are required by law to retain it;
- have the processing restricted;
- object to processing based on our legitimate interest, and to direct marketing;
- receive your data in a common format or have it transferred;
- withdraw any consent you have given.

Send your request to info@mbino.com. We respond within one month. We may ask you to identify yourself, so that we do not give the data to the wrong person.

If the request concerns data that we process as a processor for one of our customers (see section 2), we forward your request to that customer, or help them to handle it.

If you are not satisfied with how we handle your data, you can lodge a complaint with the Autoriteit Persoonsgegevens (Dutch Data Protection Authority, autoriteitpersoonsgegevens.nl). If you live in Belgium, you can also contact the Gegevensbeschermingsautoriteit (Belgian Data Protection Authority, gegevensbeschermingsautoriteit.be).

10. Changes

We may amend this privacy statement, for example if our services change. The date at the top shows when it was last amended. We inform our customers of important changes.