



## Privacy Policy

*Last updated: May 2025*

### 1. Overview

This Privacy Policy explains how Swyp BV ("Swyp", "we", "us", "our") collects, uses, shares, and protects your personal data when you use our website and platform ("Services"). Swyp is committed to safeguarding your privacy and complying with the General Data Protection Regulation (GDPR).

By using Swyp, you acknowledge and agree to the practices described in this Privacy Policy.

### 2. Who We Are

Swyp BV is a company registered in Belgium, offering a platform that enables dental practices to easily purchase dental supplies from multiple vendors.

Swyp acts as a **data controller** when handling your personal data to provide our Services. In some cases, we may act as a **data processor**, such as when retrieving and managing supplier data on your behalf.

### 3. What Data We Collect

We collect and process the following types of data:

#### a) Information You Provide

- Account details (e.g. name, email address, clinic name, location)
- Communication preferences
- Connected third-party supplier accounts (e.g. encrypted login tokens)

#### b) Activity and Usage Data

- Search queries, cart actions, and product views
- Purchase history from authorized third-party suppliers
- Interaction logs (e.g. time of actions, frequency of features used)

#### c) Device and Connection Data

- Browser type, IP address, device information
- Time zone and approximate geolocation (via IP or optional GPS, WiFi)

### 4. Why We Process Your Data

We use your personal data for the following purposes:

- **To provide and personalize our Services**

- **To retrieve product information and submit actions to supplier platforms on your behalf**
- **To communicate with you**, including support and account updates
- **To improve and develop our platform**
- **To ensure security, prevent fraud, and detect abuse**
- **To comply with legal obligations**

Where legally required, we will obtain your **explicit consent** (e.g. for marketing communications or non-essential cookies).

## 5. Legal Bases for Processing

Under the GDPR, we rely on the following legal bases:

- **Contractual necessity:** to provide and manage your Swyp account
- **Consent:** for optional features like marketing emails
- **Legitimate interests:** for analytics, platform improvement, and fraud prevention
- **Legal obligation:** for compliance with applicable laws

## 6. How We Share Your Data

We may share your data in the following ways:

- **With third-party supplier platforms** you explicitly authorize us to connect with (e.g. cart updates, price lookups)
- **With service providers** who help us run our platform (e.g. cloud hosting, analytics, customer support)—under strict data protection agreements
- **With new representatives of your clinic** if authorized and required for continuity
- **In the event of a business transfer**, such as a merger or acquisition

We **do not sell** your personal data. Any data shared with third parties for analytics or research will be **aggregated or anonymized**.

## 7. Data Transfers

Swyp is based in the European Union. If we transfer your data outside the EEA, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) approved by the European Commission.

## 8. Data Retention

We retain personal data only for as long as necessary to:

- Provide our Services
- Comply with legal obligations
- Resolve disputes and enforce agreements

You may delete your account at any time by contacting us at [support@swyp.be](mailto:support@swyp.be). Upon deletion, your personal data will be erased unless retention is required by law.

## **9. Your Rights**

Under the GDPR, you have the right to:

- Access the personal data we hold about you
- Request correction or deletion of your data
- Object to or restrict certain processing activities
- Data portability (receive your data in a usable format)
- Withdraw consent at any time (where processing is based on consent)
- Lodge a complaint with a supervisory authority (e.g. Gegevensbeschermingsautoriteit in Belgium)

## **10. Cookies and Tracking**

Swyp uses cookies and similar technologies to provide essential functionality, analyze usage, and improve our Services. Where required, we will ask for your consent for non-essential cookies.

You can manage your cookie preferences through your browser settings or our cookie banner.

## **11. Security**

We implement appropriate technical and organizational measures to protect your data against loss, misuse, unauthorized access, and alteration. While we strive to protect your information, no method of transmission over the Internet is 100% secure.

In the event of a data breach, we will notify affected users and regulators in accordance with legal requirements.

## **12. Legal Requests**

We may disclose your data if required to do so by law, court order, or governmental request. We review all such requests carefully to ensure they comply with applicable laws and respect your rights.

### **13. Third-Party Links**

Swyp may contain links to third-party websites. This Privacy Policy does not apply to those sites. We are not responsible for the privacy practices or content of third-party websites.

### **14. Changes to This Policy**

We may update this Privacy Policy from time to time. When we do, we'll notify you via our website or other communication methods.

Please review this policy periodically for updates.

### **15. Contact**

For any questions, concerns, or requests regarding your data or this policy, you can contact us:

**Email:** [team@swyp.be](mailto:team@swyp.be)