

Privacy policy

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This Privacy Policy explains how Confidus Comm.V – SCS ("**Boxflow**", "**we**", "**us**", or "**our**") collects, uses, stores, and protects your personal data when you visit our website (www.boxflow.be) or use our service.

1 Introduction

1.1 Data controller

The data controller for this Privacy policy is Confidus Comm.V – SCS, with registered office at Rue de la Victoire 57/1, 1060 Brussels, Belgium, registered with the Belgian Crossroads Bank of Enterprises under registration number 0839.449.975. You can contact us at hi@boxflow.be.

1.2 Scope of this policy

This policy covers:

- Visitors to our website (www.boxflow.be)
- Registered users of the Boxflow service
- Newsletter subscribers or marketing contacts
- Our general data processing as a controller

When you process personal data of third parties through Boxflow (e.g., your employees' data, your customers' contacts), Boxflow acts as a Data Processor on your behalf. Your obligations and our responsibilities in that scenario are detailed in our separate Data Processing Agreement (DPA), which you must accept before processing personal data through the service.

1.3 Our commitment to privacy

We are committed to protecting your privacy and ensuring compliance with the General Data Protection Regulation (GDPR), the Belgian Data Protection Act of July 30, 2018, and all applicable Belgian and European data protection laws.

2 Personal data we collect

2.1 Data you provide directly

When you register for an account, we collect personal information such as your full name, email address, company name, VAT number, and, optionally, your phone number, billing address, and job title. For payment purposes, your credit or debit card details are securely processed by Stripe, and we may also collect SEPA direct debit mandates, along with your billing history and invoices.

In terms of service configuration, we process your account settings and preferences, any integration credentials you provide (including API keys and OAuth tokens for external platforms you connect), as well as the configuration and workflow rules you create within the service. Additionally, we collect information related to your communications with us, such as support enquiries, feedback, and feature requests, as well as your marketing preferences and records of consent.

2.2 Data collected automatically

We automatically collect certain technical data when you use our services. This includes information such as your IP address, browser type, device details, the pages you visit, how long you spend on each page, the referring source, and session timestamps. Additionally, we gather error logs and diagnostic data to help identify and resolve technical issues.

Our use of cookies and tracking technologies supports various essential functions. Some cookies are required for session management and security purposes and cannot be disabled. We also use analytics cookies, such as those from Google Analytics, to monitor website performance. Marketing cookies, including those from HubSpot and Brevo, help us track the effectiveness of our campaigns. Preference cookies are used to remember your settings and enhance your experience.

2.3 Data from third parties

We also obtain data from third-party sources to support our services. When you connect external platforms such as eBox Enterprise, MyMinfin, or similar services, we receive the information you authorize us to access, which may include messages, documents, and associated metadata. For payment transactions, Stripe provides us with payment confirmation details as well as fraud detection data. Additionally, our marketing tools, including Google Analytics, HubSpot, and Brevo, supply us with metrics on user engagement to help us analyze and enhance our marketing efforts.

3 Legal basis for processing

We process your data under GDPR Article 6 based on:

- **Contractual necessity** (6(1)(b)): Account creation, service delivery, billing, support
- **Legitimate interest** (6(1)(f)): Security monitoring, fraud prevention, analytics, service improvement, business continuity
- **Legal obligation** (6(1)(c)): Tax compliance, accounting records, regulatory reporting
- **Your consent** (6(1)(a)): Marketing emails, non-essential cookies, case studies, public customer references

You may withdraw consent at any time without affecting prior lawful processing.

4 How we use your data

We use your data for several essential purposes. This includes creating and managing your account, delivering our Service, and providing customer support. We process payments and billing information, implement security measures for fraud prevention and monitoring, and utilize website analytics to improve our services. With your consent, we may send marketing communications. Additionally, we ensure compliance with legal obligations.

5 Who we share your data with

5.1 Subprocessors

We use third-party services that may access your data. All service providers are contractually required to maintain GDPR compliance and process data only per our instructions. Data transfers outside the EU are protected by Standard Contractual Clauses (SCCs) and/or EU-US Data Privacy Framework.

Complete details about all subprocessors, including contact information and GDPR documentation links, are provided in Appendix A of our Data Processing Agreement.



5.2 External platforms you connect

When you connect external platforms (eBox, MyMinfin, etc.) to Boxflow, these are not our subprocessors. You authorize us to retrieve data from platforms where you already store your data. You are responsible for reviewing their privacy policies.

5.3 Legal requirements

We may disclose your data when required by law (court orders, regulatory requests, law enforcement) or to protect our rights or prevent fraud.

5.4 Business transfers

In case of merger, acquisition, or asset sale, your data may transfer to the successor entity (with email notification).

5.5 No data sales

We do not sell or monetize your personal data to third parties.

6 Data retention

Boxflow retains your data according to specific periods based on legal and business requirements. While your subscription remains active, we maintain your account information, configuration settings, audit logs, and billing history. After your subscription is terminated, your account data may be deleted within 30 days, while backup copies for disaster recovery are retained for up to one year. Audit logs and security records are preserved for five years, invoices and financial records are kept for seven years in compliance with Belgian accounting laws, and tax records are stored for ten years in accordance with Belgian tax regulations. Marketing-related data is held until you unsubscribe, withdraw your consent, or after three years of inactivity.

If you wish to have your personal data deleted, you may submit a request by emailing hi@boxflow.be. We will respond to such data subject deletion requests within 30 days, unless legal retention obligations require us to retain certain information for a specified period.

7 Your rights under GDPR

You have several rights under the GDPR regarding your personal data. These include the right to access your data, correct any inaccuracies, delete your information (the right to be forgotten), restrict the processing of your data, and receive your data in a structured, portable format. You also have the right to object to certain types of processing and to lodge a complaint with the Belgian Data Protection Authority. To exercise any of these rights, you can email hi@boxflow.be with the subject line "Data Subject Rights Request." We will respond within one month, although this period may be extended to three months for complex requests. For more detailed procedures, please refer to Section 5 of our Data Processing Agreement.

8 Confidentiality & security

8.1 Personnel obligations

Boxflow ensures that persons authorized to process Personal Data have committed themselves to confidentiality or are under an appropriate legal obligation of confidentiality. All employees and contractors with access to Personal Data are required to execute written confidentiality agreements, receive data protection training, comply with this DPA and applicable data protection laws and ensure data is only accessed when necessary for service delivery.

8.2 Technical and organizational security measures

Boxflow implements and maintains appropriate technical and organizational security measures to ensure a level of security appropriate to the risk, including:

- **Encryption:** TLS/HTTPS (min. 256-bit) for data in transit; AES-256 encryption for data at rest; encrypted connections to external platforms.
- **Access controls:** role-based access control limiting access to authorized personnel only; multi-factor authentication for administrative access; unique identification and authentication for each user; regular access reviews and revocation of unnecessary permissions.
- **Monitoring & detection:** audit logging of access to Personal Data; security monitoring and alerting; regular vulnerability scanning; regular penetration testing.
- **Infrastructure security:** firewall protection and network segmentation; DDoS mitigation and intrusion detection systems; regular security patches and dependency updates; physical access control to data centers under cloud provider responsibility.

8.3 Measures for Data Subjects' rights

Boxflow, considering the nature of processing, will support the Controller in meeting its obligations to address data subject rights requests by implementing suitable technical and organizational measures. This assistance covers requests for access to personal data (Article 15 GDPR), rectification of inaccurate data (Article 16 GDPR), erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR), data portability (Article 20 GDPR), and objections to processing (Article 21 GDPR).

Boxflow will respond to reasonable requests for data subject assistance within 10 business days, or sooner if the Controller requires it to meet GDPR response deadlines.

9 Cookies

9.1 What are cookies?

Cookies are small text files stored on your device when you visit our website. They help us provide, protect, and improve our service.

9.2 Types of cookies we use

Boxflow uses these types of cookies.

Essential cookies are always active and are required for the proper functioning of the service. These cookies handle key tasks such as session management, user authentication, security protection (including CSRF prevention) and maintaining account access and login status. The use of essential cookies is based on contractual necessity as outlined in Article 6(1)(b) of the GDPR, and they cannot be disabled.

Preference cookies are used to remember your individual choices and settings, such as language and timezone selections, user interface preferences, and your cookie consent decisions. The legal basis for processing preference cookies is either Boxflow's legitimate interest, for providing you with the most optimal service.

Analytics cookies are employed to help Boxflow understand how visitors interact with the website. For this purpose, Google Analytics collects information on pages visited, navigation patterns, device and browser details, geographic location at the country or city level, and traffic sources or referrals. These analytics cookies are only used with your explicit consent, as required under Article 6(1)(a) of the GDPR.

Marketing cookies support personalized marketing efforts and the tracking of campaign effectiveness.



10 Children's privacy

Boxflow is a B2B service not intended for individuals under 16. We don't knowingly collect data from children.

11 Marketing communications

Boxflow communicates with users through both transactional and marketing emails. Transactional emails, including account creation notifications, password resets, invoices, service updates, and support responses, are sent automatically and do not require your prior consent. In contrast, marketing emails such as newsletters, promotions, feature announcements, webinars, and case studies are only delivered if you have provided explicit consent.

If you wish to stop receiving marketing communications, you can easily unsubscribe by clicking the "unsubscribe" link included in any marketing email, adjusting your account preferences, or directly emailing hi@boxflow.be.

12 International data transfers

Primary storage for Boxflow is in EU data centers only. Some subprocessors transfer data to the US (Stripe, HubSpot, Google Analytics, Make.com, LinkedIn, Microsoft Entra ID). All transfers are protected by EU Standard Contractual Clauses (SCCs), EU-US Data Privacy Framework, encryption in transit and at rest, and regular compliance reviews.

13 Supervisory authority

If you have concerns regarding your data privacy, you may contact the Belgian Data Protection Authority at Rue de la Presse 35, 1000 Brussels, by phone at +32 (0)2 274 48 00, or via email at contact@apd-geb.be. Additional information is available on their website <https://www.dataprotectionauthority.be>. You have the right to lodge a complaint with the authority at any time without needing to contact us first.

14 Contact information

If you have any questions about privacy, you can contact us by email at hi@boxflow.be, by phone at +32 (0)2 315 30 20, or by mail at Confidus Comm.V – SCS, Rue de la Victoire 57/1, 1060 Brussels, Belgium. For requests related to data subject rights, please email hi@boxflow.be with the subject line "Data Subject Rights Request."

15 Changes to this policy

We may update this policy to reflect changes in our practices, new features, or legal requirements. We'll notify you of material changes via email and display a notice on our website.