

Salviminda

Sabisu Consulting BV · S-Link

Privacy Notice

Sabisu Consulting BV — Salviminda / S-Link

v2.0 · In force · 30 September 2026

1. Introduction

Sabisu Consulting BV (trading as Salviminda), registered in Belgium ("we", "us", "our"), is committed to protecting your Personal Data. This Privacy Notice explains how we collect, use and protect personal information in the context of our S-Link Peppol e-invoicing service and our general business activities.

This Notice applies to: (a) contacts who interact with us directly — prospects, clients, users of the S-Link portal and visitors to our website; and (b) individuals whose personal data appears in invoices and other business documents processed and stored through the S-Link service. For individuals in category (b), our clients act as Data Controllers and we act as their Data Processor — please refer to your organisation's own privacy notice, and address requests about that data to them.

This Notice is supported by our Information Security Policy and our Intellectual Property & Data Protection Policy, both of which are available to clients and prospects on request.

2. Who We Are

Item	Detail
Company	Sabisu Consulting BV
Trading name	Salviminda
Products	S-Link connector for Microsoft Dynamics 365 Business Central / NAV / Finance & Operations; S-Link Hub
Address	Leuvensesteenweg 280, 3200 Aarschot, Belgium
Company number	1003.537.848
VAT number	BE 1003.537.848
Website	www.salviminda.com
Privacy contact	privacy@salviminda.com
General contact	sales@salviminda.com
Data Protection Officer	Not appointed. Salviminda is not required to appoint a Data Protection Officer under Art. 37 GDPR. Data protection matters are handled by the Managing Director and can be raised at privacy@salviminda.com .

For all data protection queries and requests, please write to privacy@salviminda.com.

3. Personal Data We Collect and Why

3.1 Contact and Prospect Data (Salviminda as Controller)

When you contact us, request a demo, subscribe to communications or enter into a commercial relationship with us, we collect:

Category	Examples	Purpose	Legal Basis (GDPR Art. 6)
Identity data	Name, job title	Responding to enquiries; providing and supporting the service	Art. 6(1)(b) contract; (f) our legitimate interest in managing the client relationship
Contact data	Business email, phone, company name	Communications; quoting; service delivery and support	Art. 6(1)(b); (f) as above
Marketing data	Business email, subscription preferences	Sending product and service updates you have asked to receive	Art. 6(1)(a) consent, which you may withdraw at any time
Billing data	Invoice address, VAT number, payment references	Billing, accounting and statutory record-keeping	Art. 6(1)(b); (c) legal obligation

We collect this data from you directly. We do not purchase or rent contact lists, and we do not enrich your data from third-party sources or build profiles about you.

3.2 E-invoice Data (Salviminda as Processor on behalf of Clients)

When processing business documents on behalf of our clients, we handle personal data contained in those documents — typically names and business contact details, and in the case of sole traders, name, address, bank account details and VAT or registration number.

These documents are transmitted through the S-Link connector, stored in S-Link Hub — which we operate on Microsoft Azure in the West Europe region — and, where applicable, transmitted onward through the Peppol network or a national e-invoicing platform by our access-point partner. We process this data solely on our clients' documented instructions and in accordance with the Data Processing Agreement we conclude with each of them.

3.3 User Account Data

When individuals register to use the S-Link portal, we collect a username, a business email address, a hashed password, the role assigned to the account, and activity logs recording actions taken in the

portal. This data is used solely to provide, secure and support access to the Service, and to investigate incidents.

3.4 Cookies and Website Tracking

Our website uses only cookies that are strictly necessary for the site to function. We do not use analytics, advertising, social-media or other tracking cookies, we do not embed third-party tracking pixels, and we therefore do not ask for cookie consent. If this changes, we will update this Notice and seek consent before setting any non-essential cookie.

3.5 Automated Decision-Making

We do not carry out automated decision-making or profiling that produces legal effects concerning you or similarly significantly affects you, within the meaning of Art. 22 GDPR.

4. Data Sharing

We share Personal Data only as follows:

- **Microsoft Ireland Operations Ltd** — hosting of S-Link Hub on Microsoft Azure (West Europe) and our internal Microsoft 365 environment;
- **B2BRouter (Invinet Sistemas S.L., Spain)** — Peppol access point and French Plateforme Agréée services, document conversion and archiving;
- **Avalara Europe Ltd (United Kingdom)** — optional secondary access point, used only where a client has contracted for it;
- **Freelance professionals engaged by Salviminda in the Philippines** — development and support work, which involves access to client environments and the data in them (see section 5);
- **Our professional advisers** — accountants, auditors and lawyers, bound by professional confidentiality;
- **Competent authorities** — where required by law, for example tax authorities and courts;
- **A successor entity** — in the event of a merger, acquisition or restructuring, under equivalent data protection obligations.

Each of the recipients who processes data on our behalf is bound by a data processing agreement. We do not sell, rent or trade Personal Data. A current list of our sub-processors is available at privacy@salviminda.com, and clients are notified of any change at least 30 days in advance, with the right to object as set out in their Data Processing Agreement.

5. International Transfers

Personal Data is stored within the European Union. S-Link Hub and the documents it holds are hosted on Microsoft Azure in the West Europe region (the Netherlands), and we do not replicate data at rest outside the EU. Two categories of recipient are located outside the EU:

- **United Kingdom** — Avalara Europe Ltd is established in the United Kingdom. The European Commission renewed its adequacy decisions for the United Kingdom on 19 December 2025, valid until 27 December 2031, so no additional transfer safeguard is required.

— **The Philippines** — freelance professionals engaged directly by Salviminda form part of our delivery team and access our EU-hosted systems and client environments remotely. The Philippines is not covered by an adequacy decision, so these transfers are made under the European Commission's Standard Contractual Clauses (Implementing Decision (EU) 2021/914), supported by a documented transfer impact assessment reviewed annually and by technical and organisational measures including named individual accounts, multi-factor authentication, least-privilege and time-limited access, logging of access, and a prohibition on storing data locally or in personal accounts.

You may obtain a copy of the applicable Standard Contractual Clauses, with commercially confidential terms redacted, by writing to privacy@salviminda.com.

6. Data Retention

We retain Personal Data for no longer than is necessary for the purpose for which it was collected. Where we act as processor, retention is set by our client as controller. In summary:

Category	Retention period
Business documents in S-Link Hub	As instructed by our client, by default aligned with the applicable statutory archiving period — 10 years in Belgium (Art. 60 VAT Code, as amended in 2022) and 10 years in France
Business documents on the access-point platform	As configured by the client, under the access-point provider's own retention regime
User account data	Duration of the service contract + 12 months
Prospect and contact data	3 years from last interaction, or until you unsubscribe or object
Billing and accounting records	10 years for VAT records; 7 years for accounting books and supporting documents (Belgian law)
System and security logs	12 months
Support records (ticket correspondence)	3 years from ticket closure
Diagnostic exports containing client data	12 months from ticket closure
On termination of a client agreement	Client data returned in a standard format on request, then deleted from our systems within 90 days unless a legal retention obligation applies

7. Your Rights

Under the GDPR, you have the following rights regarding your Personal Data:

— **Right of access (Art. 15):** to obtain a copy of your Personal Data and information about how it is processed;

- **Right to rectification (Art. 16):** to have inaccurate Personal Data corrected;
- **Right to erasure (Art. 17):** to request deletion of your Personal Data in certain circumstances;
- **Right to restriction (Art. 18):** to request restriction of processing in certain circumstances;
- **Right to data portability (Art. 20):** to receive data you provided to us in a machine-readable format;
- **Right to object (Art. 21):** to object to processing based on our legitimate interests. Where you object to direct marketing, we will stop without exception (Art. 21(2));
- **Right to withdraw consent:** where processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, please contact privacy@salviminda.com. We will respond within one month, extendable by two further months for complex or numerous requests, in which case we will tell you within the first month. Exercising these rights is free of charge.

Where your data appears in a business document processed through S-Link, our client is the controller. We will forward your request to them without undue delay and assist them in responding.

8. Complaints

If you believe your data protection rights have been infringed, we would like the chance to put it right — please contact us first at privacy@salviminda.com. You also have the right to lodge a complaint with the Belgian Data Protection Authority, and to an effective judicial remedy:

Gegevensbeschermingsautoriteit / Autorité de protection des données

Drukpersstraat 35 / Rue de la Presse 35, 1000 Brussels, Belgium

Tel: +32 2 274 48 00 · Email: contact@apd-gba.be · Website: www.dataprotectionauthority.be

If you are resident in another EU Member State, you may also complain to the supervisory authority there.

9. Updates to This Notice

We may update this Privacy Notice from time to time — for example if we add or change a sub-processor, a processing location or a purpose. Material changes will be communicated via our website or by direct notification. The current version is always available at www.salviminda.com.

Last updated: 30 September 2026 · Version 2.0, in force, superseding the v1.0, v1.1 and v1.2 drafts.