SALVIMINDA

Privacy Notice

How Sabisu Consulting BV, trading as Salviminda, handles personal data

Sabisu Consulting BV, trading as Salviminda · Leuvensesteenweg 280, 3200 Aarschot, Belgium · BE 1003.537.848

Version 2.4 — in force since 5 November 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.

It applies to (a) contacts who interact with us directly — prospects, clients, users of the S-Link portal and visitors to this 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 own organisation's privacy notice, and address requests about that data to them.

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
Privacy contact	privacy@salviminda.com
General contact	sales@salviminda.com
Data Protection Officer	Not appointed. Salviminda is not required to appoint a DPO under Art. 37 GDPR. Data protection matters are handled by the Managing Director.

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:

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). When processing business documents on behalf of our clients, we handle personal data contained in those documents — typically names and business contact details, and for

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 by our access-point partner. We process this data solely on our clients' documented instructions and under the Data Processing Agreement concluded with each of them.

3.3 User account data. When individuals register to use the S-Link portal we collect a username, business email address, hashed password, assigned role, and activity logs recording actions taken in the portal. This is used solely to provide, secure and support access to the service, and to investigate incidents.

3.4 Cookies. This website uses only cookies 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 producing legal effects concerning you or similarly significantly affecting you, within the meaning of Art. 22 GDPR.

Category	Examples	Purpose	Legal basis
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, withdrawable at any time
Billing data	Invoice address, VAT number, payment references	Billing, accounting and statutory record-keeping	Art. 6(1)(b); (c) legal obligation

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;

— Base44 (United States) — the platform on which our internal applications are built and currently hosted: TicketHub, our support-ticket application, in which ticket text and attachments submitted by client users may contain personal data; and First Flow, our CRM, which holds business contact details. We are redeploying both to our own Microsoft Azure environment in the European Union by 31 January 2027 (see section 5);

— B2Brouter Global SL (Spain) — Peppol access point and French accredited platform services, document conversion and archiving;

— Avalara — Peppol access point and national platform services, where a client holds its own contract with Avalara. In that case Avalara acts as that client's own processor and not on our behalf; we transmit to it on the client's instruction. Processing takes place within the European Union;

— 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;

— A successor entity — in the event of a merger, acquisition or restructuring, under equivalent data protection obligations.

Each recipient processing data on our behalf is bound by a data processing agreement. We do not sell, rent or trade personal data. The current list is published at salviminda.com/legal/sub-processors.

5. International transfers

S-Link Hub and the business documents it holds are hosted on Microsoft Azure in the West Europe region (the Netherlands), and those documents are not replicated at rest outside the EU. Personal data submitted by client users in support tickets is at present held in TicketHub, our internal support-ticket application, which is hosted in the United States; that data is therefore processed outside the EU. We are redeploying TicketHub and our First Flow CRM to our own Microsoft Azure environment in the European Union by 31 January 2027, after which this processing outside the EU ceases. Avalara Europe Ltd, the contracting entity for the Avalara platform where a client contracts it directly, is incorporated in the United Kingdom, but the processing takes place within the European Union and Avalara personnel do not access the content of documents exchanged through the Service; there is accordingly no transfer of personal data to the United Kingdom. Two categories of recipient are located outside the EU:

— The United States — Base44, the platform on which our internal TicketHub and First Flow applications are built and currently hosted. A data processing agreement incorporating the European Commission's Standard Contractual Clauses (Implementing Decision (EU) 2021/914), or reliance on the EU–US Data Privacy Framework where the provider is certified, is being concluded, and a transfer impact assessment documented. Client personal data is being withdrawn from the applications in the meantime. Salviminda is redeploying both applications to its own Microsoft Azure environment in the European Union, by 31 January 2027. In the redeployed environment the data is reachable only through the applications themselves, and administrative access to the environment is restricted to system administrators located in the European Union. On completion no personal data is held on the platform provider's infrastructure and the provider ceases to act as a sub-processor. We will confirm completion in this Notice.

— 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, role-based access control, logging of access, and a prohibition on storing data locally or in personal accounts. Per-company restriction of access, removal of standing administrative access, just-in-time elevation for production support, and the use of synthetic data for development work are being implemented; the current position is described in section 6 of our Technical and Organisational Measures.

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
System and security logs	12 months
Support records	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 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 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;

— Right to withdraw consent — where processing is based on consent, at any time, without affecting the lawfulness of processing before withdrawal.

To exercise any of these rights, contact privacy@salviminda.com. We 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 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 donnéesDrukpersstraat 35 / Rue de la Presse 35, 1000 Brussels, BelgiumTel: +32 2 274 48 00 · Email: contact@apd-gba.be · 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 this website or by direct notification. The current version is always available on this page.