

Last updated: 21 March 2026

Data Controller

SOMOS is a Belgian corporate wellbeing initiative currently in the pre-incorporation phase (not yet registered as a BV/SRL). Until formal incorporation, the founding team is responsible for the processing of personal data described in this policy.

- **Contact email:** info@somoshealth.be
- **Website:** <https://somoshealth.be>

Once SOMOS is incorporated as a Belgian limited liability company (BV/SRL), this policy will be updated with the registered company name, address, and enterprise number.

Scope

This privacy policy applies to all personal data collected through the SOMOS website at somoshealth.be. It explains what data we collect, why we collect it, how we use it, and what rights you have under the General Data Protection Regulation (GDPR) and Belgian data protection law.

What Data We Collect

Email addresses

When you sign up via the form on our landing page, we collect your email address. This is the only personal data we ask you to provide, and you do so voluntarily.

Analytics data (non-personal)

We use Plausible Analytics, a privacy-friendly analytics tool that:

- Does not use cookies
- Does not collect personal data
- Does not track individual users
- Processes all data in aggregate

Plausible does not collect IP addresses, browser fingerprints, or any other information that could identify you. No personal data is processed through our analytics.

Admin session data

SOMOS uses Auth0 to authenticate a small number of admin users (the founding team). Auth0 may set session cookies strictly for the purpose of maintaining authenticated sessions. This does not apply to regular visitors of the website.

Purpose and Legal Basis

We process personal data for the following purposes:

Data	Purpose	Legal basis (GDPR)
Email address	To send you updates about SOMOS and gauge market interest	Consent (Art. 6(1)(a))
Admin session cookies	To authenticate admin users	Legitimate interest (Art. 6(1)(f))

You can withdraw your consent at any time by contacting us at info@somoshealth.be or by using the unsubscribe link in any email we send you.

Data Sharing and Processors

We do not sell your personal data. We use the following third-party processors to operate our service:

- **Postmark** (ActiveCampaign, LLC) – email delivery service, processes email addresses to send transactional and marketing emails on our behalf
- **Auth0** (Okta, Inc.) – authentication service, processes session data for admin users only
- **Plausible Analytics** (Plausible Insights OÜ) – privacy-friendly web analytics, does not process personal data

These processors are bound by data processing agreements and process data only on our instructions.

International Data Transfers

Some of our processors are based outside the European Economic Area (EEA). Where personal data is transferred outside the EEA, we ensure appropriate safeguards are in place, such as:

- EU Standard Contractual Clauses (SCCs)
- Adequacy decisions by the European Commission
- Other GDPR-compliant transfer mechanisms

Data Retention

- **Email addresses:** We retain your email address until you withdraw your consent (unsubscribe) or request deletion. We will also delete email addresses that are no longer needed once SOMOS's market validation phase concludes, unless you have opted in to continued communication.
- **Admin session data:** Session cookies expire automatically when the browser session ends or after the session timeout configured in Auth0.
- **Analytics data:** Plausible retains only aggregate, non-personal statistics. No personal data is stored.

Cookies

SOMOS uses minimal cookies:

- **No analytics cookies.** Plausible Analytics does not set any cookies.
- **Admin session cookies.** Auth0 sets session cookies for authenticated admin users. These are strictly necessary for admin functionality and are not used for tracking. They do not apply to regular website visitors.
- **Cookie consent.** Our cookie consent banner stores your consent preference. This cookie is used solely to remember whether you have accepted or declined cookies.

Regular visitors who do not log in as admin users will not have any tracking or functional cookies set beyond the consent preference.

Your Rights

Under the GDPR, you have the following rights regarding your personal data:

- **Right of access** (Art. 15) – You can request a copy of the personal data we hold about you.
- **Right to rectification** (Art. 16) – You can ask us to correct inaccurate personal data.
- **Right to erasure** (Art. 17) – You can ask us to delete your personal data.
- **Right to restrict processing** (Art. 18) – You can ask us to limit how we use your data.
- **Right to data portability** (Art. 20) – You can request your data in a structured, machine-readable format.
- **Right to object** (Art. 21) – You can object to our processing of your data.
- **Right to withdraw consent** (Art. 7(3)) – You can withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, contact us at info@somoshealth.be. We will respond within 30 days.

Right to Lodge a Complaint

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the Belgian Data Protection Authority:

Gegevensbeschermingsautoriteit / Autorite de protection des donnees

- **Address:** Drukpersstraat / Rue de la Presse 35, 1000 Brussels, Belgium
- **Phone:** +32 (0)2 274 48 00
- **Email:** contact@apd-gba.be
- **Website:** <https://www.gegevensbeschermingsautoriteit.be/>
<https://www.autoriteprotectiondonnees.be>

Changes to This Policy

We may update this privacy policy from time to time. When we make significant changes, we will notify you by email (if we have your email address) or by posting a notice on our website. The “Last updated” date at the top of this policy indicates when it was last revised.

Contact

For any questions about this privacy policy or our data practices, contact us at:

- **Email:** info@somoshealth.be
- **Website:** <https://somoshealth.be>