Privacy Policy

Last updated: November 13, 2026

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1. Introduction

CoBoo ("we", "our" or "us") is committed to protecting your privacy. CoBoo (KvK 99516551, based in Hoogeveen) is the data controller. Lumyo is a product of CoBoo. This privacy policy applies to our websites coboo.nl and lumyo-awareness.com and to the Lumyo products. It explains how we collect, use and protect your personal information.

2. Information we collect

2.1 Information you provide

When you contact us via email or through one of our forms (see section 12), we collect the information you voluntarily provide, such as:

- Name
- Email address
- Company name
- Message content

2.2 Automatically collected information

We use Google Analytics to collect anonymous information about your visit, including:

- Pages visited
- Time spent on pages
- Referring website
- Browser type and version
- Device type
- Approximate location (country level)

2.3 Web server access log

Our web server keeps an access log of every visit, also without consent for cookies. It contains your IP address, the time, the requested page, the referring page, the country (as passed on by Cloudflare) and your browser. We use this log for security, to detect misuse and to fix problems. The legal basis is our legitimate interest (Art. 6(1)(f) GDPR): keeping the websites secure and tracking down misuse and problems. Old log files are deleted automatically after 30 days. We do not share this log with third parties.

3. How we use your information

We use the collected information to:

- Respond to your questions and requests
- Improve our websites and services
- Analyse website traffic and user behaviour
- Ensure security and prevent fraud

4. Cookies

We use two types of cookies:

4.1 Necessary cookies

These cookies are essential for the website to function. They remember your cookie preferences and cannot be disabled.

4.2 Analytics cookies (Google Analytics)

With your consent, we use Google Analytics (via Google Tag Manager) to collect usage statistics. Google Analytics records information such as pages visited, session duration and device type. We use Google Consent Mode v2: analytics are only activated after you give consent via our cookie notice. You can withdraw your consent at any time via "Manage cookies" in the footer.

If you send a form after giving consent, an event "generate_lead" is sent to Google Analytics with only the name of the form and the website. Your name, email address and other input are not sent to Google.

5. Data sharing

We do not sell, rent or share your personal information with third parties, except:

- Cloudflare (hosting and CDN), see their privacy policy
- Google (Google Analytics via Google Tag Manager), see their privacy policy
- Proton (email hosting, Switzerland), for email you send us and for requests sent through our forms. See their privacy policy

- When required by law or to protect our rights

6. Data security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure or destruction. This includes:

- HTTPS encryption for all communication
- Regular security updates
- Limited access to personal data
- Secure storage systems

7. Your rights (GDPR)

Under the General Data Protection Regulation (GDPR), you have the following rights:

- **Right of access:** You can ask which personal data we hold about you
- **Right to rectification:** You can ask us to correct inaccurate data
- **Right to erasure:** You can ask us to delete your data
- **Right to restriction:** You can restrict the processing of your data
- **Right to data portability:** You can receive your data in a structured format
- **Right to object:** You can object to the processing of your data

To exercise these rights, contact us at: contact@coboo.nl

8. Data retention

We do not keep your personal data longer than necessary for the purposes for which it was collected:

- Email correspondence: 2 years after last contact
- Record of cookie consent: 1 year
- Analytics data: 6 months (anonymised)
- Web server access log: 30 days, then deleted automatically

9. International data transfer

Your data may be processed on servers located outside the European Economic Area (EEA). Where that is the case, we ensure appropriate safeguards are in place to protect your data in accordance with the GDPR.

10. Children's privacy

Our websites are not intended for children under 16. We do not knowingly collect personal information from children under 16. If you are a parent or guardian and believe your child has provided us with personal information, please contact us.

11. Changes to this privacy policy

We may update this privacy policy from time to time. We will notify you of any changes by posting the new privacy policy on this page and updating the "Last updated" date.

12. Contact forms

Both websites have an introduction form, among others on the contact page of coboo.nl and of lumyo-awareness.com. coboo.nl also has the partner form (partners). The forms send your request through our own service on our web server. That service checks the input and emails the request via Proton (smtp.protonmail.ch):

- Forms on coboo.nl: from noreply@coboo.nl to contact@coboo.nl.
- Form on lumyo-awareness.com: from noreply@lumyo-awareness.com to contact@lumyo-awareness.com.

You then receive a confirmation email at the address you entered.

We process the fields you fill in:

- Introduction form: name, email address, company name and number of employees (on coboo.nl only if you fill it in), and if you fill them in, phone number and preferred time or short question.
- Partner form: name, email address and company name, and if you fill them in, phone number, website, preferred type of partnership and details.
- For every form, the language of the page (Dutch or English).

- The service does not store the form data; it is only in the email to us and in the confirmation email to you.
- To limit abuse, the service briefly uses your IP address and email address in memory to cap the number of requests. This is not stored and is gone within a day at most.
- We use this information solely to respond to the request.

- The legal basis is our legitimate interest (Art. 6(1)(f) GDPR): answering your request and preventing misuse of the forms.
- You may request deletion of your data at any time via contact@coboo.nl.
- A hidden field in the form detects automated spam bots. This field collects no personal data and is never stored or processed.
- The forms use Cloudflare Turnstile to keep out spam. Cloudflare processes your IP address and browser data for this; no tracking cookies are set.

13. Google Workspace integration

Administrators at our customers can connect their Google Workspace to Lumyo Portal. For this, Portal only requests read access to the user list (scope admin.directory.user.readonly). For each employee we store only their name, email address, department, language and whether the account is active. We do not write anything back to Google. We use this data solely to pass employees on to the Lumyo products Training and Phishing Simulation. We do not share it with third parties and do not use it for advertising. The administrator can disconnect the integration at any time in Portal or via the Google account settings, after which retrieval stops.

Security: the connection with Google is encrypted (HTTPS). Access tokens are stored encrypted and used only to retrieve the user list. Only authorized Lumyo staff have access to this data.

Retention and deletion: we keep data from Google Workspace for as long as the customer uses Lumyo. If the administrator disconnects the integration, retrieval stops immediately and we delete the access token. A customer can request deletion of all data via dev@lumyo-awareness.com. We do this within 30 days.

Use for AI: Google Workspace API data is not used to develop, improve or train generalized (non-personalized) AI or ML models.

Lumyo's use and transfer to any other app of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements.

14. Integration via SCIM (for example Microsoft Entra ID) or CSV

Administrators at our customers can send employees to Lumyo Portal via SCIM 2.0 from their own identity management (for example Microsoft Entra ID), or upload a CSV file. For each employee sent via SCIM we store only their name, email address, department, whether the account is active and the reference numbers from the customer's system (externalId and userName). For a CSV file we store only name, email address and department. Via SCIM we only accept email addresses within the email domains set for the customer; for a CSV file this applies as soon as email domains have been entered. We do not call any Microsoft API and do not write anything back to the customer's system. We use this data solely to pass employees on to the Lumyo products Training and Phishing Simulation. We do not share it with third parties and do not use it for advertising.

Security: each customer receives its own access token for SCIM. We store this token only as a hash, and the administrator can revoke it at any time in Portal. The connection is encrypted (HTTPS).

Retention and deletion: we keep this data for as long as the customer uses Lumyo. If an employee is deactivated or deleted via SCIM, we also remove that employee from Training and Phishing Simulation. If the customer is removed from Lumyo Portal, we delete all of this data for that customer. A

customer can request deletion of all data via dev@lumyo-awareness.com. We do this within 30 days.

15. Contact

If you have any questions about this privacy policy, please contact us:

Data controller: CoBoo, based in Hoogeveen

Email: contact@coboo.nl

KvK (Dutch Chamber of Commerce): 99516551

> **Dutch Data Protection Authority:** If you believe we have not processed your personal data correctly, you have the right to lodge a complaint with the Autoriteit Persoonsgegevens (AP), the Dutch supervisory authority for data protection. More information: autoriteitpersoonsgegevens.nl