

The purpose of this policy is to describe to you the information we may hold about you, explain what we use it for and explain your rights in relation to it. At Partrim BV, doing business with the trade name **Dutch Export Solutions** ('Dutch Export Solutions', 'we', 'us', 'our'), we are committed to protecting your personal information and your right to privacy. By visiting our website <https://www.dexss.com> (the 'Website'), you are accepting the practices described in this Privacy & Cookie Policy notice ('PCP'). If there are any terms in this PCP that you do not agree with, *please discontinue use of our Website immediately*.

When you visit our Website and/or use our mobile application (the 'App') and more generally use any of our services (the 'Services', which include the Website and App), we appreciate that you are trusting us with your personal and business information.

This PCP applies to all information collected through our Services (which, as described above, includes our Website and App), as well, any related services, sales, marketing or events. Please read this document carefully as it will help you understand what we do with the information that we collect. A copy of this policy is posted on our website and may also be obtained by sending a request to [marketing@dexss.com](mailto:marketing@dexss.com).

## **1. What information do we collect?**

### ***Personal information you disclose to us***

We collect personal information that *you voluntarily provide to us* when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Service or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect may include the following: names, phone number, email addresses, job titles, contact preferences and other similar information. All personal information that you provide to us must be true, complete and accurate, and you must notify us any changes to such personal information.

### ***Information automatically collected through our Services***

We automatically could collect certain information when you visit, use or navigate the Services. This information *does not reveal your specific identity* (like your name or contact information), but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URL's, device name, country, location, information about how and when you use our Services and other strictly technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also could collect information through cookies and similar technologies. This includes:

- **Log and usage data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically could collect when you access or use our Service and which could be recorded in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- **Device Data.** We could collect device data such as information about your computer, mobile phone, tablet or other device you use to access the Services. Depending on the device used, this device data may include information such as you IP address (or proxy server), device and application identification numbers, location, browser type, hardware model and manufacturer, Internet service provider and/or mobile carrier, operating system, system configuration information and information about features of our Services you accessed.

- **Facebook permissions.** We by default could access your Facebook basic account information, including your name, email, gender, birthday, current city and profile picture URL, as well as other *information that you choose to make public*. For more regarding Facebook permissions, see Facebook's Permissions Reference information.

All automatically collected information is primarily needed to maintain the security and operation of our Services, for troubleshooting and for our internal analytics and reporting purposes.

### ***Information collected from other sources***

In order to enhance our ability to provide relevant marketing, offers and services to you and update our record, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, social media URL's and custom profiles, for purposes of targeted advertising and event promotion.

## **2. How do we use your information?**

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To post testimonials.** We post testimonials on our Services that may contain personal information. *Prior to posting a testimonial, we will obtain your consent to use your name* and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us using the contact details provided in the section below titled '14. How can you contact us about this notice?'
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Services.
- **To enable user-to-user communications.** We use your information in order to enable user-to-user communications with each user's consent.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes.** This is to comply with legal and regulatory requirements or in connection with our contract.
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, *only if this is in accordance with your marketing preferences*. For example, when expressing an interest in obtaining information about us or our Services, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out our marketing emails at any time (see '9. What are your privacy rights' below).

- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. *We will not use identifiable personal information without your consent.*

If you choose not to provide relevant personal information, we may not be able to provide you with the services you require. To remove your details at any time, please contact [marketing@dexss.com](mailto:marketing@dexss.com) with your request.

### **3. Will your information be shared with anyone?**

We may process or share your data that we hold based on the following legal basis:

- **Legal obligations:** we may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Consent.** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate interests.** We may process your data when it is reasonable necessary to achieve our legitimate business interests.
- **Performance of a contract.** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Vital interests.** We may disclose your information where we believe it is necessary to investigate, prevent or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities or as evidence in litigation in which we are involved.

More specially, we may need to process your data or share your personal information in the following situations:

- **Business transfers.** We may share or transfer your information in connection with/during negotiations of any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.
- **Vendors, consultants and other third-party service providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features and better understand online activity. If you do not agree with this, *please stop use of our Services immediately.*
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor our PCP. Affiliates include our parent company and any subsidiaries, joint ventures or other companies that we control or that are under common control with us.

### **4. Who will your information be shared with?**

We only share and disclose your information with the following third parties that are active in:

- Cloud computing services;
- Functionality and infrastructure optimization;
- Data backup and security;
- Content optimization;
- Web and mobile analytics;
- Website hosting.

If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled '14. How can you contact us about this notice?'

### **5. Do we use cookies and other tracking technologies, how is it dealt with?**

Like most websites we use some form of cookies so that your browsing is more optimized and streamlined. This section allows you to better understand how cookies work and how to use existing tools to set them up.

#### ***What are (the components of) cookies?***

The term of 'cookies' is to be taken broadly and covers all the tracers registered and/or read, for example, when viewing a website or a mobile application during the consultation of a website. A cookie is information placed on your hard drive by the server site or a mobile application you visit. It contains several data such as the name of the server that was filed, a unique alpha-numerical identifier and possibly an expiration date. This information is often stored on your computer or smartphone in a simple text file which a server accesses to read and record information. Cookies have particular aims to collect information about your browsing on sites. In your computer cookies are managed by your web browser.

#### ***Use of cookies and other tracking technologies***

We may use cookies and similar tracking technologies (like web beacons, bugs, pixel tags and for web storage) to access or store information. We use cookies to enhance your experience on the Website. While using the Services cookies could be placed on your computer, your mobile or tablet.

#### ***Retention of data***

Google Analytics is being used to track your user experience with the Website. This data is used to enhance your experience and ensure we are providing the best user experience possible. Data will be held indefinitely unless otherwise instructed and you have the right to delete this information. If a user wishes, they may request to delete their information being tracked by contacting us using the contact details provided in section 14. below titled 'How can you contact us about this notice?' or by looking up cookie preferences on your web browser (see below in this section).

#### ***Required and analytical cookies used on our site***

Required cookies are used on our Website and are needed for your use of our site, necessary to the operation and allow you to use the main features of our site. Without these cookies, you would not be able to use the website normally. Analytical cookies allow us to know the use and performance of our site and to improve the overall function of the site and its content (for example: most often viewed pages, how long a session is and what links an anonymous user has clicked).

#### ***Cookie preferences and how to reject cookies***

You can always choose to disable cookies by changing the settings in your browser. Most browsers allow you to manage cookies. You can set your browser to refuse cookies or delete some. Generally, you can also manage similar technology in the same way, using your preferred browser.

The following links show you how to set your cookie preferences based on your browser, such as:

- Internet Explorer: 'Delete and Manage Cookies'
- Firefox: 'Cookies – Information that websites store on your computer'
- Safari: 'Manage cookies and website data'
- Google Chrome: 'Clear, enable and manage cookies in Chrome'

### **6. How long do we keep your personal information?**

We will only keep your personal information for as long as it is necessary for the purpose set out in this PCP, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes. We will destroy or remove any identifying features held about you within a reasonable time after the information is no longer required.



When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **7. How do we keep your information safe?**

We have implemented appropriate technical and organizational security measures designed to protect the security of personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet of information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

#### **8. Do we collect information from minors?**

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us using the contact details provided in the section below titled '14. How can you contact us about this notice?'

#### **9. What are your privacy rights?**

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information; (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If you are a resident in the EEA and you believe we are unlawfully processing your personal information, you also have the right to complain to your local protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are a resident in Switzerland, the contact details for the data protection authorities are at: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

#### **10. Do California residents have specific privacy rights?**

Californian Civil Code Section 1798.83 permits our users who are Californian residents to request and obtain from us, once a year and free of charge, information about the names and addresses of all third parties (if any) with which we shared personal information in the immediately preceding calendar year. If you are a Californian resident and would like to make such a request, please submit your request in writing to us using the contact information in section 14. provided below.

If you are under 18 years of age, reside in California and have used our Service, you have the right to request removal of unwanted data that you voluntarily send to us. To request removal of such data, please contact us using the contact information provided in section 14. and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not deliberately displayed using the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

#### **11. Controls for Do-Not-Track features**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored or collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this PCP.

#### **12. Do we make updates to this notice?**

We may update this PCP from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this PCP, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this PCP frequently to be informed of how we are protecting your information.

#### **13. How can you review, update, or delete the data we collect from you?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information or delete it in some circumstances. To request to review, update or delete your personal information, please contact us using the contact details provided in the section below titled '14. How can you contact us about this notice?' We will respond to your request within 30 days.

#### **14. How can you contact us about this notice?**

If you have questions or comments about our PCP or concerns about our practices with regards to your personal information, you may contact us at [marketing@dexss.com](mailto:marketing@dexss.com).