

PRIVACY POLICY

We are CtrlChain (formerly known as ChainCargo). We respect your privacy and private life, but sometimes we need your Personal Data. We consider Personal Data to be any information relating to an identified or identifiable person, in conformity with the General Data Protection Regulation (the GDPR).

This policy explains which Personal Data we use and why (the Privacy Policy). Furthermore, you will read how we store, protect and process this Personal Data.

This Privacy Policy applies to our Website www.ctrlchain.com (the Website), our online application (the App) and the services or products we provide (the Services). We process your Personal Data in accordance with the GDPR and all other relevant legislation and regulations in the field of protection of Personal Data, like Dutch Telecommunications Act (Telecommunicatiewet) regarding the use of cookies (the Relevant Legislation).

Are you under the age of 16?

If you are younger than 16 years old, you need permission from your parents or legal guardian to use our Website, App and Services.

Processing of Personal Data

In order to provide you with our Website, App and Services, we process your Personal Data.

Who is the controller of your Personal Data?

We are the controller of your Personal Data within the meaning of the Relevant Legislation. At the end of this Policy, you can find our contact details.

What Personal Data do we process, on which legal basis and for which specified purpose(s)

We need some of your Personal Data in order for you to use our Website, Apps and Services.

We are allowed to process your Personal Data, because we comply with the Relevant Legislation. We lawfully process your Personal Data because:

Processing Personal Data is necessary in order to perform our contract;

We have to comply with a legal obligation;

We have legitimate interests to process your Personal Data, where we have considered these are not overridden by your rights;

You have given us consent;

Processing is necessary in order to protect the vital interests of you or another person, or

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

We make sure that the processing of your Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose for which the Data is processed.

In the table below you will read (1) which Personal Data we process (2) for which purpose(s) and (3) on which legal basis.

We shall only use your Personal Data for the following purposes or for compatible purposes. By doing so, we will not use your Personal Data in an unexpected manner.

(PERSONAL) DATA

Contact Data:

- Company name
- First and/or last name
- Email address
- Address
- Phone number
- Chamber of Commerce number
- VAT number

PURPOSE(S)

We use these Data:

- To contact you
- To correspond with you
- For the delivery or performance of our Services to you

LEGAL BASIS

We process these Data on the basis of:

- A necessity to perform the contract
- Consent
- Legitimate interests

PAYMENT DATA:

- Name of account holder
- IBAN number
- BIC number
- Invoices
- An overview of the purchases of our Services

We use these Data:

- To send invoices
- To update our financial administration

We process these Data on the basis of:

- A necessity to perform the contract
- Consent
- Legitimate interests

PARTNER AND/OR SUPPLIER DATA:

- Company name
- First and/or last name
- Email address
- Address
- Phone number
- Chamber of Commerce number
- VAT number
- Payment Data
- Invoices
- Purchases from suppliers or partner

We use these Data:

- To contact you
- To correspond with you
- To purchase a Service or product
- To update our financial administration

We process these Data on the basis of:

- A necessity to perform the contract
- Consent
- Legitimate interests

OTHER DATA:

- Location Data of our affiliated couriers

We use these Data:

- To select the right courier for a specific transport and to provide live track & trace during active orders

We process these Data on the basis of:

- A necessity to perform the contract
- Consent (via a signed agreement)

CONTENT DATA

- Correspondence with you via the live chat
- Correspondence with you via the contact form on our website.

We use these Data:

- To receive feedback from you
- To improve our services.

We process these Data on the basis of:

- A necessity to perform the contract
- Consent
- Legitimate interests.

HOW DO WE RECEIVE YOUR PERSONAL DATA?

Personal data we receive from you:

We receive personal data directly from you when you log in via our website, and/or when you sign up to our service.

Are you obliged to share your Personal Data with us?

In some cases, the processing of your Personal Data is necessary. This is relevant, for example, when we have to process your Personal Data in order to oblige to a contract with you or to provide a service to you. Without your Personal Data, we cannot provide our Service to you.

Automated individual decision-making

By using your Personal Data we can make certain decisions automatically, for example selecting the right courier for a specific shipment. We do this based on the current location and the at CtrlChain known company address of the user. It is important that we can make these decisions, because by automating the selection of the correct courier based on the data of the individual person we create a better matching strategy between shipper and courier, which allows us to process shipments in a more efficient way. If an automated individual decision has important consequences for you, you can ask for a reassessment by one of our employees.

How do we secure your Personal Data?

We do our utmost to protect your Personal Data from being lost, destroyed, abused, altered or spread by unauthorized parties. For this reason, persons who have nothing to do with your Personal Data, do not have access to them. We ensure this by taking the following measures:

- Encryption (encoding) of digital files containing Personal Data;
- Secure network connections with Secure Socket Layer (SSL), or a comparable technology;

The access to the Personal Data is strictly limited to the employees on a 'need to know' basis;

A CRM (Customer Relation Management) system that requires double verification before accessing Personal Data.

How long do we store your Personal Data?

We shall not store your Personal Data longer than the period in which we need them for the aforementioned purposes. We delete the Personal Data after we no longer need them for the purpose we process them for.

With whom do we share your Personal Data?

We may share your Personal Data with data 'processors' within the meaning of the Relevant Legislation. We conclude a Data Processing Agreement with these parties, which entails that they shall process your Data carefully and that they shall only receive the Personal Data they need to provide their service. These parties shall only use your Personal Data in accordance with our instructions and not for their own purposes. We share your Personal Data with certain [logistic planners]. These processors enable us to [process shipments in the most effective way]. We also share your Personal data with a [business software company] that helps us to [maintain our bookkeeping].

If we have a legal obligation to share your Personal Data, we will do so. This is the case, for example, if a public authority legally requires us to share your Personal Data.

Transfer

We shall only process your Personal Data within the European Union. We shall only process your data outside the European Union if that country offers an appropriate level of protection for your Personal Data.

We shall never transfer your Personal Data to other countries or to other parties than those mentioned above.

Links

Our website and our App may contain links to other websites. We are not responsible for the content or the privacy protection on these

websites. Therefore, we advise you to always read the Privacy Policy of those websites.

Cookies

A cookie is a small text file that can be sent via the server of a website to the browser. The browser saves this file to your computer. Your computer is tagged with a unique number, which enables our site to recognize that computer in the future.

We use cookies to improve the user experience on our Website. Moreover, cookies ensure that the Website works faster, that you can visit our Website safely and that we can track and solve errors on our Website.

You can always delete or disable cookies yourself via the browser settings. No more cookies will be stored when you visit our Website. However, please note that without cookies, our Website may not function as well as it should. For more information you can read our cookie statement: www.ctrlchain.com/cookiestatement.

Modifications to the Privacy Policy

We may modify this Privacy Policy. If we substantially modify the Privacy Policy, we shall place a notification on our Website and in our App together with the new Privacy Policy. We shall notify registered users in case of a substantial modification. If you are not a registered user, we advise you to consult the Website and this Policy regularly.

Your rights

You have the following rights:

- You can request access to your Personal Data;
- You can request us to correct, limit or delete your Personal Data. In the event of fraud, non- payment or other wrongful acts, we can store some of your Personal Data in a register or on a blacklist;
- You can request a copy of your Personal Data. We can provide this copy to third parties at your request, so you do not have to do so yourself;
- You can object to the processing of your Personal Data;
- You can file a complaint at the Dutch

- Data Protection Authority (Autoriteit Persoonsgegevens) if you are of the opinion that we wrongfully process your data;
- You can always withdraw your permission to process your Personal Data. From the moment of your withdrawal, we cannot process your Personal Data anymore.

Contact

In the event that you wish to exercise these rights, or in the event of other questions or remarks regarding our Privacy Policy, you can contact us via the following contact details.

CtrlChain

Schimmelt 22, 5611 ZX Eindhoven
+31 (0) 85 00 13 700
info@ctrlchain.com

