

Privacy Policy goSettle B.V.

Last updated: May 17, 2025

1. Introduction

goSettle B.V. ("goSettle", "we", "us", or "our") is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, share, and protect your personal data when you visit our website gosettle.com (the "Website") and interact with us. We process your data in accordance with the General Data Protection Regulation (GDPR).

This policy outlines the types of personal data we may collect, the purposes for which we use it, the legal bases for processing, and your rights regarding your personal data.

2. Contact Details

goSettle B.V. (trading as goSettle)

Nassaukade 5

3071 JL Rotterdam

Netherlands

Email: contact@gosettle.com

Phone: +31 10 360 29 25

Website: gosettle.com

For any questions regarding this Privacy Policy or your data protection rights, please contact us using the details above.

3. What Personal Data Do We Process?

We may collect and process the following categories of personal data, depending on your interaction with our Website and services:

- **Identity and Contact Data:** Such as your first and last name, email address, telephone number, company name, and job title if you provide these to us (e.g., by filling out a contact form or corresponding with us).
- **Technical Data:** Such as your Internet Protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website. This data is typically collected automatically.
- **Usage Data:** Information about how you use our Website, products, and services.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Other Information:** Any other personal data you voluntarily provide to us, for example, in email correspondence or through feedback forms.

We do not intend to collect sensitive personal data through the Website unless legally required or with your explicit consent.

4. Purposes and Legal Basis for Processing Personal Data

We use your personal data for the following purposes and based on the following legal grounds:

- **To operate and maintain our Website:** Ensuring the Website is functional, secure, and provides a good user experience.
 - *Legal Basis:* Legitimate interests (to effectively offer and maintain our online presence).
- **To respond to your inquiries and provide support:** Addressing your questions, requests for information (e.g., about our services or partnerships), or support needs.
 - *Legal Basis:* Legitimate interests (to respond to you and operate our business); Performance of a contract (if your inquiry relates to an existing or potential contract).
- **To manage our relationship with you:** This includes notifying you about changes to our terms or privacy policy, or asking you to leave a review or take a survey.
 - *Legal Basis:* Performance of a contract; Legitimate interests (to keep our records updated and to study how customers use our products/services).
- **For marketing and business development:** To send you information about our services, news, events, and other updates that may be of interest to you, where you have consented or where we have a legitimate interest (e.g., existing business relationship), always offering an opt-out option.
 - *Legal Basis:* Consent; Legitimate interests (to develop our products/services and grow our business).
- **To improve our Website, services, marketing, and customer relationships:** Using data analytics to understand how our Website is used and to enhance user experience.
 - *Legal Basis:* Legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy).
- **To comply with legal and regulatory obligations:** Fulfilling our legal, regulatory, and compliance requirements.
 - *Legal Basis:* Legal obligation.
- **For security and fraud prevention:** To protect our business, our Website, and our IT infrastructure.
 - *Legal Basis:* Legitimate interests (to protect our assets and prevent fraud).

5. Sharing Personal Data with Third Parties

We do not sell your personal data. We may share your personal data with third parties only in the following circumstances and for the purposes described in this policy:

- **Service Providers (Processors):** We may share data with companies that provide services on our behalf, such as IT and system administration services, website hosting, analytics providers, or marketing automation platforms. These processors are contractually bound to protect your data and may only use it in accordance with our instructions.

- **Professional Advisors:** Including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services, where necessary for our legitimate business operations.
- **Legal or Regulatory Authorities:** If required by law, regulation, legal process, or governmental request, we may disclose your personal data to competent authorities.
- **Business Transfers:** In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company, your personal data may be transferred as part of the transaction, subject to standard confidentiality arrangements.

We ensure that any third party with whom we share personal data provides adequate protection for such data, in line with GDPR requirements. We do not mention specific internal settlement structures or specific settlement infrastructure partners in this public-facing policy. Settlement activities core to our service are facilitated through a network of licensed and regulated payment partners.

6. Security of Your Data

We have implemented appropriate technical and organizational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These measures include, but are not limited to, secure connections (e.g., SSL/TLS), access controls, and data encryption where appropriate. We regularly review our security policies and procedures to ensure our systems are secure and protected.

7. Data Retention Periods

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, and whether we can achieve those purposes through other means, as well as applicable legal requirements.

8. Cookies and Similar Technologies

Our Website uses cookies and similar technologies to enhance your Browse experience, analyze site traffic, and for other purposes. For detailed information on the cookies we use, the purposes for which we use them, and how you can manage your cookie preferences, please see our Cookie Policy.

9. Your Rights Under GDPR

Under the GDPR, you have several rights concerning your personal data. These include:

- **Right of access:** You can request a copy of the personal data we hold about you.
- **Right to rectification:** You can ask us to correct inaccurate or incomplete personal data.

- **Right to erasure ('right to be forgotten'):** You can ask us to delete your personal data under certain conditions.
- **Right to restriction of processing:** You can ask us to restrict the processing of your personal data under certain conditions.
- **Right to object to processing:** You can object to our processing of your personal data if it is based on our legitimate interests or for direct marketing.
- **Right to data portability:** You can request that we transfer the personal data you provided to us to another organization, or to you, in a structured, commonly used, and machine-readable format, under certain conditions.
- **Right to withdraw consent:** If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.²⁰

To exercise any of these rights, please contact us at contact@gosettle.com. We will respond to your request within one month, though this period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We will inform you of any such extension.²²

10. Withdrawing Consent

Where our processing of your personal data is based on your consent, you have the right to withdraw this consent at any time. You can do this by contacting us or using any opt-out mechanisms provided in our communications (e.g., an "unsubscribe" link in emails).

11. Complaints

We are committed to resolving any complaints about our collection or use of your personal data. If you have any concerns, please contact us first at contact@gosettle.com. You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement. The Dutch Data Protection Authority (Autoriteit Persoonsgegevens) is the relevant supervisory authority for goSettle in the Netherlands.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or services. We will post any changes on this page and update the "Last updated" date at the top of this policy. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your data.

Contact

For any questions, comments, or complaints regarding this Privacy Policy or our data processing practices, please contact us at:

Email: contact@gosettle.com

Phone: +31 10 360 29 25