

PRIVACY POLICY

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PREPARED AND IMPLEMENTED BY:	WILLEM DE WAARD MANAGING DIRECTOR
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SUMMARY OF CHANGES

REVISION	DATE	DESCRIPTION OF CHANGES
1	13-May-20	FIRST ISSUE
2		
3		



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DEFINITIONS

“Third Parties” refers to any person or entity that is independent from Global-X-Change Network BV, suppliers, contractors, vendors or sub-contractors and other parties engaged by or on behalf of Global-X-Change Network BV; and

“Global-X-Change” refers to Global-X-Change Network BV and its subsidiaries.



This privacy statement applies to the processing of personal data by Global-X-Change Network BV (Dutch Chamber of Commerce No. 77894006), hereinafter to be referred to as GLOBAL-X-CHANGE.

1 PROCESSING OF PERSONAL DATA

The protection of personal data is of utmost importance to GLOBAL-X-CHANGE. GLOBAL-X-CHANGE respects your privacy and ensures that your personal data is always treated confidentially and in accordance with applicable Dutch privacy legislation.

2 PURPOSES AND LEGAL BASIS FOR PROCESSING

Your personal data will be processed by GLOBAL-X-CHANGE for the following purposes and on the basis of the following legal basis.

Purposes of processing	Legal Basis					
	Consent	Contractual	Legal obligation	Vital interests	Public task	Legitimate interest
1 the performance of the contract(s) to which you (as the data subject) are party;		X				
2 the conducting of the administration, as well as other tasks of internal management;		X	X			X
3 the calculation, recording and collecting of amounts due, including handing over claims to third parties;		X	X			X
4 to be able to contact you and respond to questions asked by you;						X
5 to inform you about new products and/or services of and offers from GLOBAL-X-CHANGE;						X
6 to send digital newsletters which are sent to you via e-mail;	X					X
7 to operate and improve the website and service(s) of GLOBAL-X-CHANGE;						X
8 to comply with legal obligations, such as the documentation and retention obligations;			X			
9 to handle disputes and have audits carried out.			X			X



The relevant legal basis for processing has been ticked behind each purpose of processing. The legal basis as listed in the table are abbreviated as follows:

- **Consent:**
The consent given by you (Article 6 paragraph 1 sub a GDPR);
- **(pre)Contractual:**
The taking of pre-contractual measures at your request and/or the performance of the contract(s) to which you are party (Article 6 paragraph 1 sub b GDPR);
- **Legal obligation:**
Compliance with legal obligations (Article 6 paragraph 1 sub c GDPR);
- **Vital interests:**
The protection of the vital interests of yourself or others (Article 6 paragraph 1 sub d GDPR);
- **Public task:**
The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 paragraph 1 sub e GDPR);
- **Legitimate interest:**
The pursuance of legitimate interests by GLOBAL-X-CHANGE or a third party (Article 6 paragraph 1 sub f GDPR);

Where the basis for 'legitimate interest' has been ticked in the table above, the interest pursued is the following: offering you an online platform to advertise assets and services to other B2B users and enable them to communicate with you, marketing interest of the organisation, providing updates and new or improved features of the Global-X-Change website.

You can object to the processing of personal data for 'legitimate interests' purposes with the right to object. You have the right to withdraw the given consent for the processing of personal data on the basis of consent at any time. More information about those rights can be found later in this privacy statement.

3 MANDATORY PROVISION OF PERSONAL DATA

In each case where we ask you to provide personal data on a mandatory basis (e.g. as required by law), we will state the reason. GLOBAL-X-CHANGE will not process more personal data than necessary for the purposes described above.



4 COLLECTING OF PERSONAL DATA THROUGH WEBSITE

4.1 Voluntary provision of personal data

GLOBAL-X-CHANGE collects the personal data voluntarily provided when you use the website:

Registration form

Your name, phone number, company e-mail address, organisation you work for, country of origin of organisation you work for, website URL of organisation you work for, main business activity of the organisation you work for. We use the personal data provided to us via the registration form on the website to:

- 1) to verify that the country of origin of the organisation you work for is permitted by our bank to receive financial transactions from. From certain countries we are unable to receive financial transaction from. These include: Cuba, Iran, North Korea, Sudan, Syria, Venezuela and Yemen. As sanctions and banking restrictions are lifted, we will update this list and accept registrations accordingly;
- 2) to verify that the business activity of the organisation you work for matches the sub-categories we currently have available to maximise the effectiveness of your experience and that of other users;
- 3) to enable you using the Global-X-Change website and its functionalities (incl. in-site purchases).
- 4) To communicate with you during the time you are a registered user of the Global-X-Change website.

Contact form

Your name, phone number and e-mail address and any additional information you provide as a remark. We use the personal data and additional information provided to us via the contact form on the website only to understand the matter at hand and to respond to your request and contact you for further interaction or clarifications.

Confidentiality

The Global-X-Change website in its bare essence is currently an advertising website. You can see the assets and services for sale or for lease from other users, and they can see the assets and services you are offering. In order to attract attention for the assets and services you are offering from other users, it may be beneficial to disclose your contact details and/or photograph (i.e. personal information), so that an user interested in your assets or services may know who they are dealing with.

However, as we respect confidentiality and privacy very highly, we have provided for the option, at your choice, to make all of the personal data and/or photograph you are providing to the Global-X-Change website, confidential. In this case, other users will not see the personal data and/or photograph you have selected not to disclose. A user can still send you a response to a particular asset or service you are offering through the Global-X-Change website, whereby he will not know to which e-mail address the response is being sent to. You may change these settings in your account file at any time to the level of confidentiality you are comfortable with exposing them towards other users (or as may be required for your offering).

In the event you are not offering any assets or services on the Global-X-Change website and are only viewing advertisements from other users, all of your personal information and/or photograph is kept confidential.



However, all of your personal information can be accessed by the management of GLOBAL-X-CHANGE Network BV (except passwords) and its webdeveloper Omines Internetbureau BV. The management of GLOBAL-X-CHANGE may use this information to communicate with you regarding matters pertaining your registration and your use of the platform.

4.2 Cookies

GLOBAL-X-CHANGE makes use of functional and analytical cookies in order to evaluate and improve the use of its website and global marketing efforts. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone upon the first visit to GLOBAL-X-CHANGE's website. This will help us improve the functionality of the website.

The cookies we use do not collect any personal data. Most internet browsers do offer the possibility to (partially) prevent cookies being placed on your device or at least being notified when such is being the case.

The only cookies used by GLOBAL-X-CHANGE at this time are:

- (1) a functional session cookie. Please refer to <https://www.allaboutcookies.org/cookies/session-cookies-used-for.html> for further background information.
- (2) those cookies that come as part of the "Google Analytics" service. Please refer to the documents [Google Analytics Cookie Usage on Websites \(9-Aug-2018\)](#) and [Google Privacy Policy \(22-Jan-2019\)](#) for further cookie and privacy related details.

In any case, the information collected by Google is made anonymous and specifically does not include providing your IP address to GLOBAL-X-CHANGE.

The information collected by Google may be saved and stored on servers in the United States of America. Google may be required to disclose the information collected to third parties under law or in situations where the information is processed by third parties on behalf of Google. GLOBAL-X-CHANGE does not have any influence on these disclosures.

4.3 Younger than 16 years of age

GLOBAL-X-CHANGE does not have the intention to collect any personal data of minors visiting our website. We strongly recommend parents to being actively involved in the online activities of their children in order to prevent that their personal data is shared with GLOBAL-X-CHANGE.

In the event you have a strong reason to believe that we have collected personal information about a minor without your parental consent, please contact us and we will delete this information.



5 PROCESSING OF PERSONAL DATA THROUGH 3RD PARTIES

Any personal data you provide to us through our website, is processed by the servers of our hosting provider (with whom we have entered into a processing agreement), the respective wifi and/or telecom providers and their respective subcontractors.

Any personal data you provide to us through e-mail or web-based communication tools, is processed by the servers of the respective wifi and/or telecom providers and their respective subcontractors.

The concerned parties process the personal data in accordance with their own privacy policies and their legal obligations.

6 DISCLOSURE OF PERSONAL DATA TO 3RD PARTIES

Your personal data will be disclosed by GLOBAL-X-CHANGE to the following third parties and for the following reasons:

- Government agencies: to comply with audits regarding legal obligations, such as maintaining an administration, documentation and retention obligations;
- Accountant: to comply with legal obligations regarding maintaining a financial administration, retention obligations and audits;

The concerned parties process the personal data in accordance with their own privacy policies and their legal obligations.

GLOBAL-X-CHANGE does not disclose personal data to third parties who will use the data for their own purposes. The foregoing is only different in case:

- you have given your prior consent to the concerned disclosure of data; or
- GLOBAL-X-CHANGE is statutorily required to disclose the data.

As described in Article 4.1 above, the Global-X-Change website allows you to choose whether you want to share your personal data (or parts thereof) and/or photograph with other users for the potential benefit of achieving an earlier successful transaction or enabling to take communication outside of the Global-X-Change website.



7 STORAGE PERIOD

Your personal data will be stored during the following period:

- if the legal basis concerns consent: as long as you want to receive digital newsletters;
- if the legal basis concerns a (pre)contractual relation: as long as it is necessary to undertake pre-contractual activities, during the term(s) of the agreement(s) concluded with you and/or as long as the mandatory retention period;
- if the legal basis concerns a legal obligation: as long as the mandatory retention period;
- if the legal basis concerns the legitimate interest: as long as the processing is necessary in accordance with Article 6 paragraph 1 sub f GDPR.

8 SECURITY OF PERSONAL DATA

GLOBAL-X-CHANGE shall implement appropriate technical and organisational measures to secure personal data against loss or against any other form of unlawful processing. Various measures have been taken in that context, including treating the data as confidential.

9 YOUR RIGHTS

The GDPR provides you with various rights. We have listed these rights below.

9.1 Right of access

You have the right to access the personal data processed by GLOBAL-X-CHANGE.

9.2 Right to alteration and erasure

You have the right to alter or even erase personal data in case the data are no longer correct or in case the processing is no longer legitimate.

9.3 Right to object

The right to object means that you can object to certain processing of personal data because of your specific situation. You can object to all processing of personal data that is not based on (1) your consent, (2) the taking of precontractual measures at your request and/or the performance of the contract(s) to which you are party, (3) compliance with legal obligations, or (4) the protection of the vital interests of yourself or others.

In case you object to the use of your personal data with the aim to inform you about activities of GLOBAL-X-CHANGE and similar (“direct marketing”) processing of personal data, we will always honour such an objection. Your personal data will thereafter no longer be used for any direct marketing purposes.



In case you object to any other form(s) of processing of your personal data, we will assess whether we can meet your objection. It is then up to GLOBAL-X-CHANGE to demonstrate that continuing to process (your) personal data is in favour of our legitimate interests – despite your objection to this processing. If the weighing of interests favours your interests, we will stop the processing of personal data and subsequently you will be no longer be able to use the Global-X-Change website.

9.4 Right to restriction of processing

Under certain circumstances you also have the right to restrict the processing of your personal data. In short, this means that GLOBAL-X-CHANGE will temporarily “freeze” the processing of personal data. You can invoke this right in four situations: (1) while awaiting the assessment of an alteration request, (2) in case personal data should actually be deleted, but you do not wish for erasure of this personal data, (3) in case GLOBAL-X-CHANGE no longer needs the personal data, while you do still need the personal data for (the preparation of) legal proceedings, and (4) while awaiting the assessment of an objection.

9.5 Right to data portability

You have the right to receive the personal data that you provided to GLOBAL-X-CHANGE in a commonly used file format. This right only applies to personal data that we process on the basis of your consent or for the performance of (a) contract(s) to which you are party. This right furthermore only applies to personal data that we process in digital form (and thus not in analogue format). You are free to transfer this personal data to a third party.

Should there exist a link between our systems and the systems of the third party to which you would like to transfer the data or have the data be transferred, it might be possible for us to transfer the data on your behalf. Inquire about the possibilities.

9.6 Withdrawal of consent

For certain processing we rely on the legal ground of consent (see above). You have the right to withdraw previously given consent at all times. In case you withdraw your consent, we shall immediately stop the processing of personal data.

The withdrawal of consent does not have retroactive effect. All previous processing remains lawful.

9.7 Exercise of rights

Exercising your rights is free of charge, except for misuse of those rights and except for any charges levied on us by third parties (e.g. Google) to process your request(s), in whole or in part. For every request where charges will levied on us by third parties, you agree to pay those charges prior to us giving the third party the instruction(s) to process your request(s). You can exercise your rights by contacting us via the contact details provided below.



9.8 Response period

We will answer your question/request within one month wherever possible. In the unlikely event that it takes more time to respond to your question/request, we will inform you about this within one month. It may be that due to the complexity of the requests and/or the number of requests the total response period runs up to three months.

9.9 Identification

For all questions/requests we can ask for further proof of your identity. We do this to prevent us from providing personal data to the wrong party or making incorrect changes to the processing of personal data. To ensure that your request is processed as smoothly as possible, we kindly request you to send a copy of your proof of identity in advance.

9.10 Individual consideration for every request

We would like to point out that the rights described above are not absolute rights. There may be circumstances that prevent us from responding to a specific request. We will always assess each request on its own merits. If we are unable to respond to a specific request, we will make this known to you with motivation. In that case you can then possibly go to court.

The right to object to the use of data for direct marketing purposes is absolute. Cancellations for our commercial expressions will therefore be honoured in any case.

10 SUPERVISORY AUTHORITY

You are always free to submit a complaint to the supervisory authority. The authority entrusted with the supervision of compliance with privacy legislation (in the Netherlands) is the Autoriteit Persoonsgegevens (the Dutch Data Protection Authority, Dutch DPA). You can find the contact details of the Autoriteit Persoonsgegevens via the website www.autoriteitpersoonsgegevens.nl.

11 QUESTIONS

Furthermore, you are also free to ask questions about the personal data that is processed by us. For questions about privacy, you can contact us via the contact details provided below.

12 CHANGES

GLOBAL-X-CHANGE may update its privacy statement from time to time. These changes will be posted on the website of Global-X-Change.



GLOBAL-X-CHANGE can process your personal data for new purposes that have not yet been stated in this privacy statement. In such a case we will contact you before we use your personal data for these new purposes, to notify you of the changes to our rules for the protection of personal data and to offer you the opportunity to refuse participation in such processing of data.

13 CONTACT DETAILS

If you have any questions about this privacy statement or our privacy policy, or if you would like to invoke one of your legal rights, you can contact us via:

Global-X-Change Network BV

p/a Managing Director

Paardenmarkt 1

2611 PA Delft

The Netherlands

E: info@global-x-change.com