

Privacy Policy

We know how important it is for you to understand how we use your data. This Privacy Policy sets out how and why we collect, use, store, and share your personal data when you visit our website at www.connect.gustave.io.

We are Gustave Connect (“Gustave Connect” or “we”, “us”), and our registered address is Schiemond 20, 3024EE, Rotterdam, NL.

We encourage you to read this Privacy Policy carefully, and if you have any questions or concerns about how we use your Personal Data, please contact us using info@gustave.io and we will do our best to address your concerns.

WHAT IS PERSONAL DATA?

Personal Data is any information that relates to an identified or identifiable living individual. Different pieces of information, which, collected together, can lead to the identification of a particular person, also constitute Personal Data.

WHY DO WE HAVE A PRIVACY POLICY?

The Dutch GDPR Implementation Act (Uitvoeringswet Algemene Verordening gegevensbescherming) (“UAVG”) and the EU’s General Data Protection Regulation (“GDPR”) control how your Personal Data is used by us. We are also required to explain which Personal Data we collect from you via our website, what we use it for, when we delete it and how your data is protected.

OUR LEGAL BASIS FOR USING YOUR PERSONAL DATA

We only use your Personal Data when we have a legal basis for doing so. The legal basis for using your data will depend on what we need to do but includes:

- Contract: to provide our services
- Legal obligation: to comply with the law
- Legitimate Interest: where necessary for our interests or the interest of a third party, after carefully considering any effect to individual rights and freedoms
- Consent: where clear consent is given to use your data for a specific purpose.

For more information on our legal basis for sharing, please contact info@gustave.io.

WHAT PERSONAL DATA WE COLLECT

The types of information we collect about you depend on your use of our services and the ways that you interact with us.

Personal Data you provide directly to us when you:

- access our websites;
- subscribe to our services, marketing or publications;
- request a demo or marketing to be sent to you;
- give us feedback, provide a testimonial, or contact us.

Personal Data we collect from you via third-party sources, including the following:

- Analytics providers, advertising networks, and communication services providers, including email providers and social networks, when you allow access to your information available on third-party services or networks. This may include data collected through cookies, pixels, and similar tracking technologies, which help us understand your interactions with our advertisements and improve our marketing efforts;
- Auditors, regulators and supervisory bodies; and
- Public authorities and law enforcement agencies.

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The data we collect from the sources mentioned above includes:

- Contact data, identity data, first name, last name, title, job title, date of birth, gender, address, email address, telephone number, or similar identifier.
- Transaction data, details of services you have requested or purchased from us.
- Cookies and tracking information, such as internet protocol (IP) address, your login data, access times, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID, the Uniform Resource Locator (URL), and other technology on the devices you use to access this website.
- Preferences data, such as purchases or orders made by you, your interests and feedback.
- Usage data, information about how you use, interact with, and access our website, and information relating to our business. This includes system information related to your device, system, or network (IP address, hardware model, operating system version, hardware settings, system and application configuration data, and MAC address) and how your device, system, or network interacts with our website (such as statistical information, network connection indicators, system crashes, data logs, and routing).
- Marketing and communications data, your preferences in receiving marketing from us and our third parties and your communication preferences.
- Aggregated data, statistical or demographic data. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyze general trends in how users are interacting with our website to help improve the website and our service offering.

CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it as detailed above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

THIRD-PARTY SERVICES AND CONTENT

We use content or service offers of third-party providers on the basis of our legitimate interest to integrate their content and services. This always requires that the third-party providers of this content are aware of your IP address and system information related to your device, system, or network. The following provides an overview of third-party providers and their content, together with links to their privacy policies, which contain further information on the processing of data and so-called opt-out measures, if any.

- Hosting: [Hetzner](#),
- Fonts: Typekit by [Adobe](#), and
- Analytics: Google Analytics by [Google LLC](#),

COOKIES

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. As set out in the UAVG and the EU's Privacy and Electronic Communications Directive ("PECD"), we need to obtain consent for the use of non-essential cookies. The legal basis for the use of essential cookies is our legitimate interest, and the legal basis for the use of non-essential cookies is your consent. For further information on the cookies we use, please refer to our Cookie Policy.

Our website also uses a cookie consent tool to obtain your consent to the storage of cookies and to document this consent. When you enter our website, the following Personal Data is transferred to us:

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a) Your consent(s) or revocation of your consent(s); b) Your IP address; c) Information about your browser; d) Information about your device; e) Time of your visit to our website. The legal basis for processing is both your consent and our legal obligation.

DATA SHARING AND TRANSFER

In certain cases, it is necessary to transmit the processed Personal Data in the course of data processing. In this respect, there are different recipient bodies and categories of recipients.

Internal

If necessary, we transfer your Personal Data within Gustave Connect. Access to your Personal Data is only granted to authorized employees who have a genuine need to access your data.

External

Personal Data is transferred to our service providers in the following instances: a) in the context of fulfilling our contract with you; b) to use marketing services and to advertise our business; c) to communicate with you; d) to provide our website, and e) to state authorities and institutions as far as this is required or necessary.

International transfers

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements including non-disclosure agreements, data processing agreements, and standard contractual clauses regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

SECURITY OF YOUR PERSONAL DATA

We take the security of your personal data very seriously. We have implemented various strategies, controls, policies and measures to keep your data secure and keep these measures under close review. We protect your data by using encryption techniques and we use other safeguards such as firewalls and password protection. This means that your data is protected and only accessible on a need-to-know basis. We also ensure that there are strict physical controls which restricts access to your personal data to keep it safe.

RETENTION OF YOUR PERSONAL DATA

In broad terms, we will only retain your personal data for as long as is necessary for the purposes described in this Privacy policy. This means that the retention periods will vary according to the type of the data and the reason that we have the data in the first place.

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 of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Personal Data will be deleted/destroyed or anonymized at the end of the retention period.

LINKED SITES

For your convenience, there may be hyperlinks on our website that link to other websites. We are not responsible for, and this Privacy Policy does not apply to the privacy practices of any linked websites or of any companies that we do not own or control.

SOCIAL MEDIA

We are present on social media on the basis of our legitimate interest. If you contact or connect with us via social media, we and the relevant social media platform are jointly responsible for the

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processing of your data and enter into a so-called joint controller agreement. The Personal Data collected when contacting us is to handle your request, and the bases are both your consent and our legitimate interest.

YOUR RIGHTS AND PRIVILEGES

Privacy rights

You can exercise the following rights:

- *The right to access;*
- *The right to rectification;*
- *The right to erasure;*
- *The right to restrict processing;*
- *The right to object to processing; and*
- *The right to data portability;*

Updating your information and withdrawing your consent

If you believe that the information we hold about you is inaccurate or request its rectification or deletion or object to legitimate interest processing, please do so by contacting us.

Access Request

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in the Netherlands is: Autoriteit Persoonsgegevens, Bezuidenhoutseweg 30, 2594 AV DEN HAAG, The Netherlands, (<https://autoriteitpersoonsgegevens.nl/en>). We would, however, appreciate the chance to deal with your concerns before you approach the Autoriteit Persoonsgegevens.

What we do not do

- We do not request Personal Data from minors and children;
- We do not process special category data without obtaining prior specific consent;
- We do not use automated decision-making including profiling; and
- We do not sell your Personal Data.

HELP AND COMPLAINTS

If you have any questions about this policy or about data protection at Gustave Connect in general, please contact us using info@gustave.io and we will do our best to address your concerns.

CHANGES

The first version of this policy was issued on Saturday, 26th of April, 2025, and is the current version. Any prior versions are invalid, and if we make changes to this policy, we will revise the effective date.