

PRIVACY POLICY

INTRODUCTION

Our Privacy Policy explains how we collect, use and protect information in relation to <https://gvway.nl/> website. This Privacy Policy applies to all visitors and users who access the website.

This website is operated by GVWAY

GVWAY operates in its capacity of Data Controller for the purposes of applicable data protection laws and regulations, including the Regulation (EU) 2016/679 dated 27 April 2016 on the protection of natural persons regarding the processing of Personal Data ("GDPR").

1. INFORMATION WE COLLECT

Depending on the Services provided by the website and used by you, on your choices and configuration of your terminal (with respect in particular to cookies), personal data concerning you (your "Personal Data") collected and processed by us mainly includes:

- Your Identity and Contact Details such as:
 - First and last name
 - Telephone number
 - E-mail address
 - IP address
 - Information about your activities on our website
- Cookies, tracers and similar tracking technologies to:
 - optimize site performance.
- Cookies are used to collect your device identifiers and other information such as the following:
 - to ensure that the website works properly and remember your preferred settings, you can opt out of cookies by setting your internet browser so that these no longer stores cookies.
 - you can also delete all information previously stored via the settings of your browser.

For more information about our use of cookies, please visit our [Cookies Policy](#)

To the extent permitted by applicable law, we may combine the information collected. The Personal Data that is mandatory for GVWAY to fulfil the purposes that are described below is marked with an asterisk on the various pages of the website. Should you not fill in these mandatory fields, GVWAY may not be able to take care of your demands and/or to provide you the requested services. Other Personal Data is purely optional and allows us to know you better and to improve our communications and services accordingly.

2. SPECIAL AND / OR SENSITIVE PERSONAL DATA THAT WE PROCESS

Our website and / or service does not intend to collect data about website visitors under the age of 16. Unless they have permission from parents or guardian. However, we cannot check whether a visitor is older than 16. We therefore advise parents to be involved in the online activities of their children, to prevent data about children from being collected without parental consent. If you are convinced that we

have collected personal information about a minor without this permission, please contact us at help@gvway.nl, then we delete this information.

3. PURPOSES OF PROCESSING

We collect and process your Personal Data with your consent and/or as necessary to perform a contract (e.g. to provide products ordered), meet our legal obligations, or fulfil our legitimate interests (notably for marketing purposes, to prevent fraud or to protect the security of our IT systems).

We use and process Personal Data about you for purposes described below:

- Sending our newsletter and / or advertising brochure
- To be able to call or e-mail you if necessary to carry out our services
- To inform you about changes to our services and products
- To deliver goods and services to you

We will not process your Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you or collect any Personal Data that is not required for the mentioned purposes. For any new purpose of processing we will ask your separate consent. To the extent necessary, we take all reasonable steps to ensure that Personal Data is reliable for its intended use, accurate, complete, and current. We also undertake to collect only the categories of Personal Data that are strictly required for the purposes mentioned above.

4. SHARING OF PERSONAL DATA WITH THIRD PARTIES

GVWAY does not share any personal data with 3rd party providers.

5. YOUR RIGHTS

In accordance with applicable data protection laws and regulations, you have a right to request access to, rectification or erasure of your Personal Data, or restriction of processing, and to object to said processing, as well as the right to data portability to the extent applicable, subject to any overriding legitimate grounds that GVWAY might invoke to retain your Personal Data.

You may request at any time that we stop sending you information about our offers, news and events by using the opt-out link inserted in each e-mail that we send you.

If applicable, you may also give us specific instructions regarding your Personal Data after your death.

Moreover, you have the right to lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with the GDPR.

You can exercise your rights by using your account settings or by simply writing us at the following address: help@gvway.nl. Please keep in mind that in case of a vague request we may engage a

discussion to better understand the motivation for the request and require you to prove your identity (for example, by requesting an ID). This is made to ensure that no right of third parties are violated by your request.

6. DATA RECIPIENTS

GVWAY does not sell, rent or lease your Personal Data to others. Furthermore, GVWAY does not share your Personal Data to others except as described in this Privacy Policy. These Recipients are the following:

- i. our service providers, such as providers of delivery, IT and customer services;
- ii. to law enforcement agencies, public authorities or other organisations if legally required to do so.

7. TRANSFER OF PERSONAL DATA & SECURITY MEASURES

GVWAY, or service providers may transfer information that we collect about you, across borders. If you are located in the European Union, please note that we may transfer your Personal Data to a country that does not have the same data protection laws as your jurisdiction.

Most internal and external Recipients are located in the United Kingdom, France or in an Economic European Area (EEA) Member State. However, certain Personal Data are transferred to or made accessible to Affiliates and third-party companies located in a country outside the EEA which does not ensure a level of protection equivalent to that in force in the EEA. In this case, any transfer of your Personal Data outside the EEA shall only take place subject to appropriate safeguards being in place, such as standard contractual clauses and other legal safeguards. If you wish to obtain a copy of these safeguards, you can contact us by sending a request at the following address: help@gvway.nl

We use reasonable and appropriate information security safeguards to help keep the information collected through the Services secure and take reasonable steps to verify your identity before granting you access to your account. Among others, we utilize the following security measures:

- Security software, such as a virus scanner and firewall
- With the means of TLS (formerly SSL) we secure the internet connection over which you send personal data. SSL Certificate is provided for gvway.nl.
- DKIM, SPF and DMARC are three internet standards for reducing phishing, spam and viruses sent by e-mail. These three standards are used together to verify that the sender (an email address) and the sender (a computer system) of an email are indeed correct, and that the content of the message has not changed along the way.
- Extra security layer is added by CAPTCHA. CAPTCHA stands for the Completely Automated Public Turing test to tell Computers and Humans Apart. CAPTCHAs are tools you can use to differentiate between real users and automated users, such as bots.
- DNSSEC is an extra security (in addition to DNS) for converting a domain name to the associated IP address (server name); it is provided with a digital signature. This prevents visitors from being redirected to a false IP address. You can check at <http://www.internet.nl> whether gvway.nl meets this latest standard

8. DATA RETENTION

We will retain your Personal Data as long as your account is active or needed to provide you services, and only for as long as necessary in relation with purposes of processing identified in this Privacy Policy. Information we receive about you may be retained for an extended period of time when it is the subject of a legal obligation, an investigation or otherwise to prevent harm.

- Clients' data (such as contact details) will be retained by GVWAY for the duration strictly necessary for the management of the commercial relationship. However, at the end of the commercial relationship, these data may be archived during a period of 10 years, for the purposes of establishing the existence of a contract or a right. After that period, data are deleted or anonymised.

9. CONTACT US

If you have any questions about this Privacy Policy and if you wish to exercise your rights, please contact us through the email: help@gvway.nl

10. CHANGES TO OUR PRIVACY POLICY

GVWAY may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances.