

Privacy Statement – European Seller Solutions B.V.

This privacy statement explains how European Seller Solutions B.V. handles your personal data, why we process it and what rights you have.

1. Responsible party

European Seller Solutions BV
Kieftsbeklaan 1, 7607 TA Almelo, The Netherlands
service@esscompliance.com
+31 546 241225
Trade register number: 85142557 Version 1 rev.2 (March 2024).

2. Principles and purposes of processing

We process personal data exclusively:
to be able to provide our services;
when required by law (e.g. tax regulations, EPR registrations);
based on your explicit consent, such as when using the contact form.
You are not obliged to provide personal data, but without that data we may sometimes be unable to process a request or order.

3. Contact form

You can use our contact form to ask questions or request information. When you submit this form, we process the data you enter for the purpose of handling your request. The basis for this is your consent (Art. 6(1)(a) GDPR), valid until you withdraw it. Without this data, we simply cannot process your message.

4. Recipients of data

We never disclose personal data to third parties, unless this is necessary for the performance of our services or when required by law. Recipients may include:
European tax authorities (EU Member States, Norway, UK);
Environmental organisations/producer organisations (PROs) for EPR registrations;
Partner administrative offices in Spain, Italy, the Czech Republic, Poland and Lithuania;
Software suppliers: Microsoft 365, E-Boekhouden, HubSpot, Formstack;
IT administrators for technical maintenance and security.
Copies of identity documents are stored exclusively on a secure hard drive and are only shared when strictly necessary for the performance of our services.

5. International transfer

Personal data is only processed within the EEA, with the exception of transfers to the UK.

6. Retention periods

Personal data is retained for as long as required by law, for example on the basis of tax retention obligations or the GDPR.

7. Cookies and profiling

We do not use cookies and no automated decision-making or profiling takes place.

8. Rights of data subjects

You have the right to:

- access your personal data;
- correct incorrect data;
- erase data;
- restriction of processing;
- transferability of your data;
- objection to processing based on legitimate interest;
- objection to processing for direct marketing.

9. Right to object

If we process your data on the basis of a legitimate interest, you can object to this. We will then stop processing, unless we have compelling legitimate reasons to continue. If you object to the use of your data for direct marketing, we will always stop processing immediately.

10. Withdrawal of consent

You can withdraw your consent at any time, for example via the privacy settings or via the unsubscribe link in our emails. Withdrawal does not affect the lawfulness of processing that took place before the moment of withdrawal.

If there is another legal basis for processing, we may continue to process that data.

11. Complaints

If you believe that we are not handling your personal data carefully, you can lodge a complaint with the Data Protection Authority. An overview of supervisory authorities within the EU is available via the European Union.

12. Security

We protect personal data with appropriate technical and organisational measures. Identity documents and other sensitive documents are stored on a secure hard drive and are not shared, except when necessary for our services.

13. Terms and conditions

Our services are subject to our general terms and conditions and terms of service. The British English version is binding; translations are for information purposes only.

14. Updates: Our GDPR and WWFT compliance

Recently, we have reviewed our internal processes relating to the General Data Protection Regulation (GDPR) and the Money Laundering and Terrorist Financing Prevention Act to ensure that we comply with both. This process involved a thorough evaluation of our data processing, security measures, documentation and the way we work with our partners.

In this context, we have, among other things:

- tightened up our internal procedures for data processing;
- further strengthened our technical and organisational security;
- re-evaluated all existing processing operations for necessity and purpose limitation;
- implemented additional controls and identification processes in line with the WWFT;
- and formalised our agreements with partners through updated processing

agreements.

As a result, we can say with certainty that European Seller Solutions operates in full compliance with both pieces of legislation. All personal and company data that we process is used exclusively for the provision of our services, in a manner that is secure, transparent and carefully organised.

What does this mean for you as a customer?

It means you can trust that your data is in safe hands with us. We treat your information with the utmost care, continuously improve our processes and ensure that we always comply with the latest legal requirements. In other words, you can count on us with confidence.