

## Privacy Policy

### 1. Introduction

Global Partners Network (“GPN”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how GPN collects, uses, stores, shares, and protects personal data when you visit or use our website and services.

GPN operates a marketplace connecting Clients who need assistance in another country with Partners who may perform Assignments for those Clients.

This Privacy Policy applies to personal data processed through the GPN website, including information provided through account registration, Partner registration, Assignment registration, contact forms, communications, and the performance or administration of Assignments.

This Privacy Policy is intended to explain our data-processing practices. It is not itself a contract for the provision of GPN services.

### 2. Who We Are

**Trading Name:** Global Partners Network

**Legal Name:** Global Partners Network

**KvK Number:** 86028596, the Netherlands

**Website:** <https://GlobalPartners.Network>

**Privacy Contact:** [info@GlobalPartners.Network](mailto:info@GlobalPartners.Network)

GPN is responsible for the processing of personal data described in this Privacy Policy.

GPN's website and related database infrastructure are hosted through **Cafe24**. GPN controls the data stored in its database, while the underlying hosting and database infrastructure is provided by Cafe24.

### 3. What Personal Data We Collect

Depending on how you use our website and services, we may collect the following categories of personal data.

#### 3.1 Account and Contact Information

This may include:

- Full name
- Email address
- Telephone number
- Address or other contact information when necessary
- Company information
- VAT or tax identification information where applicable
- Information provided through contact forms
- Other information you voluntarily provide to us

### 3.2 Partner Information

If you register or apply as a Partner, we may collect information such as:

- Skills and professional experience
- Languages
- Areas of expertise
- Geographic areas in which you can work
- Availability
- Qualifications and supporting documents
- Proof of relevant skills or experience
- Profile photograph, where provided or required
- Other information reasonably necessary to assess and administer Partner participation

### 3.3 Assignment and Client Information

If you submit an Assignment or request assistance from a Partner, we may collect information necessary to understand and administer the Assignment.

This may include:

- Assignment requirements
- Destination country or location
- Business-related information
- Instructions and documents
- Communication history
- Information concerning the Client and relevant representatives
- Information required to introduce the Assignment to selected Partners

Assignment information is not intended to be publicly displayed on the GPN website.

### 3.4 Payment and Financial Information

GPN may process information necessary for:

- Issuing invoices
- Recording payments
- Payment reconciliation
- Accounting
- Tax administration
- Financial record keeping

During the current Pilot stage, GPN does not operate an integrated payment checkout on the website.

Payments may be made:

- to the GPN PayPal account; or
- through an iDEAL payment link provided by GPN's Dutch bank.

GPN does not request or store complete payment-card details through the GPN website.

When you access PayPal or your bank's payment environment, that service provider's own privacy policy and terms also apply.

### 3.5 Visitor and Technical Information

When you visit the GPN website, technical information may be collected, including:

- IP address
- Date and time of access
- Browser or device-related information
- Pages visited
- Referring information
- Other technical information necessary for website operation, security, administration, or analysis

### 3.6 Approximate Geographic Information

GPN may use an IP address to estimate the **approximate geographic location associated with that IP address**.

For this purpose, GPN may send the visitor's IP address to **IPinfo.io** to obtain approximate geographic information.

The resulting information may include approximate information such as country, region, city, or geographic coordinates, depending on the information provided by the service.

This information is an IP-based estimate. It should not be understood as the visitor's precise physical location.

GPN may use this information for website administration, visitor analysis, security, and business strategy.

### 3.7 Visitor Map

GPN may display approximate visitor geographic information on an internal administrative map.

This map is **not publicly available**.

The visitor map is intended only for authorized GPN administration and analysis.

GPN currently uses the **Google Maps JavaScript API** to display the map.

Google Maps is used as a map-display service. It is not the service used by GPN to determine the approximate geographic location associated with an IP address.

## 4. How We Collect Personal Data

We may collect personal data:

- When you create an account
- When you register as a Partner
- When you submit an Assignment
- When you contact GPN
- When you communicate with GPN
- When you participate in an Assignment
- When you make or receive payments
- Automatically through technical operation of the website
- Through cookies and similar technologies, where applicable
- Through service providers used to operate or analyze the website

## **5. Why We Process Personal Data**

We may process personal data for the following purposes:

### **5.1 Providing and Administering GPN Services**

This includes:

- Creating and administering accounts
- Processing Partner registrations
- Receiving and administering Assignments
- Matching Clients and Partners
- Communicating with Clients and Partners
- Facilitating Assignments
- Managing relationships with Clients and Partners
- Providing customer support

### **5.2 Verification and Risk Management**

We may process relevant information to:

- Verify identity or qualifications where reasonably necessary
- Assess Partner suitability
- Prevent fraud, abuse, or misuse
- Protect the integrity and security of the GPN marketplace

### **5.3 Website Operation and Security**

We may process technical information, including IP addresses, to:

- Operate the website

- Detect and prevent security problems
- Investigate abuse
- Monitor technical performance
- Maintain website functionality

#### **5.4 Visitor Analysis and Business Development**

GPN may analyze visitor information, including approximate geographic information, to understand:

- Where website visitors generally come from
- Which markets may be relevant to GPN
- Website usage patterns
- Potential business opportunities
- Website performance and improvement opportunities

#### **5.5 Payments, Accounting and Tax**

We process relevant information to:

- Issue invoices
- Receive and reconcile payments
- Maintain financial records
- Comply with accounting and tax obligations

#### **5.6 Communication and Marketing**

Where legally permitted, GPN may send information about GPN, its services, or relevant business developments.

Where consent is legally required for electronic direct marketing, GPN will obtain the required consent.

You may unsubscribe from marketing communications at any time.

### **6. Legal Bases for Processing**

Depending on the circumstances, GPN may process personal data on one or more of the following legal bases under applicable data-protection law, including the GDPR:

#### **6.1 Contract or Steps Prior to Contract**

Processing may be necessary to:

- Create or administer an account
- Process a Partner registration
- Process an Assignment
- Provide requested services
- Communicate concerning an Assignment or service

- Process payments and related administration

## **6.2 Legal Obligation**

Processing may be necessary to comply with legal obligations, including:

- Accounting
- Tax
- Financial record keeping
- Legal requests
- Other applicable legal requirements

## **6.3 Legitimate Interests**

GPN may rely on legitimate interests where appropriate, for example:

- Website security
- Fraud and abuse prevention
- Protection of GPN's business
- Internal administration
- Website improvement
- Understanding general visitor patterns
- Business development
- Maintaining the reliability of the marketplace

Where we rely on legitimate interests, we consider the interests and fundamental rights of the individuals concerned.

## **6.4 Consent**

Where consent is required by applicable law, GPN will request consent before processing.

This may include certain:

- Analytics cookies
- Marketing technologies
- Direct marketing activities
- Other optional processing requiring consent

You may withdraw consent where applicable.

Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

## **7. Data Minimization**

GPN aims to collect and process only personal data that is reasonably necessary for the relevant purpose.

We do not intend to collect personal information merely because it may be useful in the future.

Where information is not necessary for the operation or administration of GPN services, providing that information may be optional.

## **8. Sharing Personal Data**

GPN may share relevant personal data with third parties where necessary for the purposes described in this Privacy Policy.

These may include:

- Selected Partners, where necessary to perform or assess an Assignment
- Clients, where necessary for an Assignment or service
- Hosting and technical service providers
- IT and website service providers
- Payment and financial service providers
- Accounting or professional advisers
- Analytics providers, where applicable
- Service providers supporting communications or administration
- Government authorities or other parties where required by law

GPN does not intend to make Client Assignments publicly available.

An Assignment may be introduced only to selected Partners considered relevant to the Assignment.

## **9. Cafe24 Hosting and Website Infrastructure**

GPN's website and database infrastructure are hosted through Cafe24.

GPN controls the information stored in its website database, while Cafe24 provides the hosting infrastructure.

Cafe24 may also operate its own technical systems and server/access logs for hosting, security, traffic management, and related technical purposes.

Such infrastructure-level logs are separate from visitor records that GPN intentionally stores in its own website database.

The retention of Cafe24 infrastructure logs may therefore differ from GPN's own visitor-record retention period.

## **10. International Data Transfers**

Some service providers used by GPN may process personal data outside the European Economic Area (EEA).

Where personal data is transferred outside the EEA, GPN will take appropriate measures required by applicable data-protection law.

Depending on the circumstances, this may include:

- An adequacy decision

- Standard Contractual Clauses
- Other legally recognized transfer mechanisms
- Appropriate safeguards required by applicable law

## 11. Cookies

GPN uses cookies and similar technologies as described in the separate **GPN Cookie Policy**.

Necessary cookies may be used where required for the operation, security, authentication, or functionality of the website.

Optional analytics or marketing technologies will be used only where legally permitted and, where required, after obtaining the appropriate consent.

## 12. Google Analytics

At the date of this Privacy Policy, **Google Analytics is not currently active on the GPN website.**

GPN may implement Google Analytics 4 in the future to understand website usage and improve the website.

If Google Analytics or another optional analytics service is implemented, GPN will configure the service in accordance with applicable privacy and cookie requirements.

Where consent is legally required, analytics technologies will not be activated before the required consent is obtained.

GPN will also update the Cookie Policy and relevant cookie information when analytics technologies are introduced.

GPN will not intentionally send directly identifying information such as names, email addresses, telephone numbers, or postal addresses to Google Analytics.

## 13. Visitor Data Retention

GPN may retain visitor records containing IP addresses and related visitor information for business analysis, security, administration, and website improvement.

GPN's intended maximum retention period for such visitor records is **12 months from the date of collection**.

GPN will configure its website system to automatically delete visitor records when the applicable retention period expires.

This retention period applies to visitor records stored by GPN in its website database.

Technical logs maintained independently by hosting or infrastructure providers may have different retention periods determined by those providers and their applicable policies.

Personal data may also be retained for longer where this is necessary to comply with a legal obligation, establish or defend legal claims, resolve disputes, investigate fraud or abuse, or satisfy other legally recognized requirements.

## 14. Other Retention Periods

Different categories of personal data may need to be retained for different periods.

For example:

- Account information may be retained while an account or relationship remains active and for an appropriate period thereafter.
- Assignment information may be retained for the administration of the Assignment and related business records.
- Financial and accounting information may be retained for the period required by applicable accounting and tax laws.
- Information necessary for legal claims may be retained for the relevant limitation period.

When personal data is no longer required, GPN will delete it or otherwise dispose of it securely, subject to applicable legal requirements.

## 15. Data Security

GPN takes reasonable technical and organizational measures to protect personal data against:

- Unauthorized access
- Loss
- Misuse
- Unauthorized disclosure
- Alteration
- Destruction

No internet-based system can be guaranteed to be completely secure.

## 16. Your Rights

Depending on the circumstances and applicable law, you may have rights including:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object to certain processing
- Right to data portability
- Right to withdraw consent where processing is based on consent

These rights are subject to applicable legal conditions and exceptions.

These rights are not limited only to EU citizens. They apply where the relevant data-protection law grants them to the individual concerned.

## 17. How to Exercise Your Rights

To exercise a privacy right or ask a question about personal data, contact:

**Email:** [PRIVACY EMAIL]

Please provide sufficient information for us to understand your request.

We may need to verify your identity before fulfilling certain requests in order to protect personal data from unauthorized disclosure.

We will respond within the period required by applicable law.

## **18. Direct Marketing**

GPN may communicate with Clients, Partners, or other users about GPN services and relevant business information.

Where consent is required, GPN will obtain consent before sending the relevant marketing communication.

You may unsubscribe from marketing communications at any time.

## **19. Automated Decision-Making**

GPN does not currently intend to make decisions producing legal or similarly significant effects based solely on automated processing of personal data.

Partner selection and Client-Partner matching may involve human review and administrative judgment.

## **20. Children**

GPN is primarily intended for businesses, professionals, Clients, and Partners.

GPN does not knowingly seek to collect personal data from children where such collection is not necessary for the operation of its services.

If you believe that a child has provided personal data to GPN unnecessarily, please contact us.

## **21. Third-Party Websites and Services**

The GPN website may contain links to third-party websites or services.

Third-party websites operate independently from GPN and may have their own privacy policies and terms.

Examples may include:

- PayPal
- Banking or iDEAL payment environments
- IPinfo.io
- Google Maps
- Other external services used by GPN

When you access a third-party service, the privacy policy and terms of that third party may apply.

## **22. IPinfo.io**

GPN may use **IPinfo.io** to obtain approximate geographic information associated with visitor IP addresses.

For this purpose, an IP address may be sent to IPinfo.io.

GPN uses this information for purposes such as visitor analysis, website administration, security, and business development.

The geographic information obtained from an IP address is approximate and should not be interpreted as precise physical location information.

IPInfo.io may process information in accordance with its own privacy policy and applicable terms.

### **23. Google Maps JavaScript API**

GPN currently uses the **Google Maps JavaScript API** to display an internal administrative visitor map.

The map is not intended to be publicly accessible as a visitor-tracking map.

Google may process certain technical information in connection with use of its Maps Platform services, subject to Google's applicable terms and privacy practices.

GPN does not use Google Maps JavaScript API as the IP-geolocation provider.

### **24. Payment Services**

During the current Pilot stage, GPN does not operate an integrated PayPal or iDEAL checkout on the website.

GPN may issue an invoice and provide:

- Payment instructions for payment to the GPN PayPal account; or
- An iDEAL payment link provided by GPN's Dutch bank.

When you use PayPal, your bank, or another payment service, the relevant provider may process personal and financial information under its own privacy policy.

GPN does not intentionally collect or store complete payment-card information through the website.

If GPN introduces integrated online payment services in the future, this Privacy Policy and the Cookie Policy will be reviewed and updated as necessary.

### **25. Complaints**

If you have concerns about how GPN processes your personal data, please contact GPN first using:

**Email:** [PRIVACY EMAIL]

You may also have the right to lodge a complaint with the competent data-protection supervisory authority.

For GPN's activities in the Netherlands, the relevant supervisory authority is the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**.

### **26. Changes to This Privacy Policy**

GPN may update this Privacy Policy from time to time.

Changes may be necessary because of:

- Changes to the GPN website
- New services or technologies

- Changes to payment services
- Changes to analytics or cookies
- Changes in applicable law
- Changes to GPN's business operations

The latest version will be published on the GPN website.

The “Last Updated” date at the beginning of this Privacy Policy indicates when the policy was most recently revised.

## **27. Contact**

If you have any questions regarding this Privacy Policy or the processing of your personal data, please contact:

**Global Partners Network**

**Website:** <https://GlobalPartners.Network>

**Email:** [info@GlobalPartners.Network](mailto:info@GlobalPartners.Network)

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