

Privacy Policy

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Last Updated	2026-10-21
Owner	CTO (interim DPO)
Approved By	CEO
Classification	PUBLIC
Applies To	All users, trade partners, prospects, and website visitors of Novatrade24

1. Controller Information

Field	Details
Controller	Novatrade24 B.V.
Address	Europalaan 2, 5232 BC 's-Hertogenbosch, The Netherlands
Phone	+31 (0)73 820 0019
Email	info@novatrade24.com
Chamber of Commerce	KvK 23080377
VAT Number	NL805854940B01
Data Protection Contact	info@novatrade24.com

The CTO fulfils the role of Data Protection Officer on an interim basis. A formal DPO shall be appointed before the organization exceeds 10 staff processing personal data, or earlier if required by regulatory guidance.

2. Scope

This privacy policy explains how Novatrade24 B.V. ("Novatrade24", "we", "us") collects, uses, stores, and protects your personal data when you:

- Use the Novatrade24 trading platform as a registered user
- Are registered as a trade partner contact
- Use the Click2Comply service as a buyer or prospect
- Visit our website at novatrade24.com
- Communicate with us by email, phone, or other channels

This policy applies in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and applicable Dutch data protection legislation.

3. What Personal Data We Collect

3.1 Platform Users (Registered Accounts)

When you register for and use the Novatrade24 platform, we process the following personal data:

Category	Data Elements
Identity data	First name, last name, date of birth, place of birth, gender, nationality
Contact data	Email address, mobile phone number
Account data	User ID, profile picture, language preference
Authentication data	Encrypted credentials, session tokens (managed via Keycloak)

3.2 Trade Partner Contacts

When you are registered as a contact person for a trade partner company, we additionally process:

Category	Data Elements
Professional data	Job title, company role (e.g., director, authorized signatory)
Company data	Company name, address, VAT number, Chamber of Commerce number
Communication data	Business email address, business phone number

3.3 KYC Verification (Identity Verification)

When identity verification is required under anti-money laundering regulations, we process:

Category	Data Elements
Identity documents	Passport or ID card (document number, expiry date, country of issuance). A copy of your document is stored encrypted on our servers in Germany (Hetzner).
Biometric data	Facial image for comparison with identity document. Your selfie is sent to iDenfy for automated matching and is not retained by Novatrade24 after verification is complete.
Address verification	Proof of address documents
Financial documents	Bank statements (when required for verification)

Biometric data (facial recognition) is classified as special category data under GDPR Article 9. We process this data on the basis of substantial public interest for fraud prevention and anti-money laundering compliance (Art. 9(2)(g)).

Provision of KYC data is mandatory. Without identity verification, we cannot grant access to the trading platform, as this verification is required by anti-money laundering law.

3.4 Orders, Shipments, and Payments

When you create or participate in trade transactions, we process:

Category	Data Elements
Order data	Order details, shipping addresses, contact information for buyer and seller
Shipment data	Delivery documents, transport details
Payment data	Billing name, billing email, payment method reference (a unique code replaces your actual card number – we never store card numbers)
Order documents	Documents uploaded to an order, such as purchase contracts, invoices, payment confirmations, bank transfer screenshots, CMR consignment notes and confirmations of arrival, and the names, addresses and other details they contain

The content of the order documents listed above may be processed by Anthropic for AI-assisted data pre-fill (see Sections 4.3, 5.1 and 6). KYC documents, identity documents and selfies are not sent to Anthropic.

3.5 Click2Comply (Buyer Compliance Service)

When you use our Click2Comply service as an unauthenticated buyer or prospect, we process:

Category	Data Elements
Identity data	First name, last name
Contact data	Email address, phone number
Company data	Company name, VAT number, Chamber of Commerce number (for business customers)
Payment data	Payment processed via Stripe Checkout (we do not receive or store card details)

3.6 Website Visitors

From 25 October 2026, our website www.novatrade24.com runs on servers in Germany that Novatrade24 rents from Hetzner and operates itself, behind Cloudflare as reverse proxy and content delivery network (CDN) for the website, which terminates the encrypted (TLS) connection and keeps request logs (see Sections 5.1 and 6). The statements in this policy on the website hosting, Cloudflare and the contact form apply from that date.

When you visit our website, we process:

Category	Data Elements
Technical data	Your full IP address, the page requested, date and time, browser type and referring page, recorded in the access logs of our servers and processed by Cloudflare when it forwards your request
Contact form data	First name, last name, company, email address, phone number, your message, whether you are a dealer, platform, buyer or other, the page you sent the form from (its path only) and the language of the page
Analytics data (only if you accept)	Pages visited, time spent, referral source, browser type, operating system, device type and approximate location, collected by Google Analytics 4 through the _ga and _ga_* cookies (see Sections 4.4 and 10)
Consent choice	Whether you accepted or rejected Google Analytics, stored in your browser's local storage under nt-consent (see Section 10)

Contact form. From 25 October 2026, an enquiry you send through the contact form is first stored on our servers (in our backend database) and then delivered to our customer relationship management system, Zoho CRM. Once Zoho CRM has the enquiry, we clear your name, company, email address, phone number, message, visitor type, source page and language from our backend database, and keep only the Zoho reference, an internal reference and the dates of delivery.

Google Analytics 4. The Google Analytics script is loaded only after you click "Accept" in the cookie banner. After "Reject", the website sets Google's documented opt-out and deletes the **_ga** and **_ga_*** cookies. Google Analytics is configured with Google signals and ad personalization signals turned off, and with advertising storage, advertising user data and ad personalization denied by default. You can change your choice at any time under "Cookie settings" at the bottom of every page. When your browser loads Google Analytics, your IP address reaches Google; Google states that Google Analytics 4 does not log or store IP addresses.

3.7 Error Monitoring

When an error occurs in the Novatrade24 platform, we send an error report to Sentry so that we can find and fix it. A report contains the technical details of the error (stack trace, release, browser type and operating system) and your user ID if you were logged in. Before a report leaves our servers or your browser, we remove names, email addresses, phone numbers, bank details, document data, tokens, request contents and your IP address from it.

In the web application, Sentry also records whether a session ended in an error (release health), any feedback you choose to send through the feedback form (without a screenshot), and a replay of the page structure and your clicks for 10% of sessions and for sessions in which an error occurs. All text, form inputs and images are masked in these replays, so they do not show the content of the page.

3.8 Customer Profile Reuse and Network Insights

Customer profile reuse. A customer company or consumer has one current KYC on the platform, whichever seller opened it. When another seller trades with the same customer, it does not start a second KYC: it reads the existing one read-only through shared KYC access, which it either adds as a customer (a billed service) or receives free of charge when the buyer purchases through Click2Comply while signed in with their account. Sellers and other counterparties read the approved version of the KYC. A person's identity check is held once per person and shared with every trade partner that person joined.

Network insights. For each KYC customer, the platform calculates network insights from the customer's own activity across all its orders and counterparties on the platform: the number of orders and the trading volume as buyer and as seller, the number of distinct trading partners and KYC relationships, the number of VAT (VIES) checks, payment and delivery compliance scores based on shipments and transport documents, the business start date from the Chamber of Commerce check, the months on the platform, risk flags and a trust score. A KYC version keeps a snapshot of the insights when one exists. The insights name the customer and are not anonymized; the figures are totals across counterparties, and the list of other obliged entities holding a compliant KYC with the customer names those trade partners. For a consumer customer, the insights are personal data.

The insights can be seen by Novatrade24 staff and by trade partners that are the obliged entity of a KYC with the customer or hold active shared KYC access to it (see Section 5.2). The KYC PDF export contains a Network Insights section, without the trust score and without the list of compliant KYC relationships, and goes to whoever exports it. Where no snapshot exists, the export shows the live insights, marked as live data, or omits the section.

Statistics and studies. Novatrade24 does not produce statistics or studies from anonymized network data. Internal reports used by Novatrade24 staff are not anonymized and are not published.

4. Purposes and Legal Bases for Processing

We process your personal data for the following purposes:

4.1 Contract Performance (Art. 6(1)(b) GDPR)

Purpose	Data Used
Creating and managing your user account (provision of identity and contact data is required to use the platform)	Identity data, contact data, authentication data
Onboarding and managing trade partner companies	Professional data, company data, contact data

Purpose	Data Used
Processing trade orders and shipments	Order data, shipment data, contact data
Collecting fees for platform services	Payment data, billing data
Sending transactional emails (order confirmations, notifications)	Email address, name
Providing Click2Comply compliance services	Identity data, contact data, company data
Answering an enquiry you send through the website contact form (steps taken at your request before entering into a contract)	Contact form data

4.2 Legal Obligation (Art. 6(1)(c) GDPR)

Novatrade24 operates as a compliance-as-a-service platform. We are **not** ourselves an obliged entity under the EU Anti-Money Laundering Directive. We facilitate KYC and AML due diligence so that our trade partners can meet their own regulatory obligations. However, we are required by law to retain certain records.

Purpose	Data Used	Legal Requirement
Facilitating KYC identity verification for trade partners	Identity documents, biometric data, financial documents	EU Anti-Money Laundering Directive (on behalf of trade partners)
Facilitating AML screening for trade partners	Verification results, screening records	EU Anti-Money Laundering Directive (on behalf of trade partners)
Tax record retention	Financial records, invoices, KYC records	German Tax Code (AO §147)
Responding to regulatory or law enforcement requests	As required by the request	Applicable laws

4.3 Legitimate Interest (Art. 6(1)(f) GDPR)

Purpose	Legitimate Interest	Data Used
Platform security and fraud prevention	Protecting our systems and users	Authentication logs, access logs, security events
Operating and securing our website	Delivering the website and protecting it against attacks and misuse	Technical data (IP address, request data in server and Cloudflare logs)
Error monitoring of the platform (see Section 3.7)	Finding and fixing errors so that the platform works reliably	Error reports, user ID, masked session replays
Sending service-related communications	Keeping users informed about relevant changes	Email address, name
Maintaining audit trails	Ensuring data integrity and accountability	All data changes (via audit logging)
Pre-filling order and compliance data from documents you upload, using AI-assisted document text extraction (see Section 5.1 for the service provider)	Reducing manual data entry and input errors	Content of uploaded order documents (purchase contracts, invoices, payment confirmations, transport documents)

Extracted values from AI-assisted document text extraction are suggestions only and are always reviewed by you or by authorized Novatrade24 staff before being applied. You may always enter data manually instead.

You have the right to object to processing based on legitimate interest. See Section 8 for details.

4.4 Consent (Art. 6(1)(a) GDPR)

Purpose	Data Used
Measuring how visitors use our website with Google Analytics 4 (see Section 3.6)	Analytics data, _ga and _ga_* cookies

Where we rely on consent, you may withdraw it at any time. For Google Analytics, choose "Reject" under "Cookie settings" at the bottom of every page of our website. You can also contact us at info@novatrade24.com. Withdrawal does not affect the lawfulness of processing before withdrawal.

5. Recipients of Your Personal Data

We share your personal data only when necessary for the purposes described in this policy. We do **not** sell your personal data to third parties.

5.1 Sub-processors

We use the following service providers who process personal data on our behalf. Data Processing Agreements (Art. 28 GDPR) are in place with each external processor.

Processor	Purpose	Data Processed	Location
Stripe (Stripe Inc.)	Payment processing	Billing data, email, payment method tokens	EU / US (Standard Contractual Clauses)
iDenfy (iDenfy UAB)	Identity verification and AML screening	Identity documents, biometric data (facial), screening results	EU (Lithuania)
Mailjet (Mailjet SAS)	Transactional email delivery	Email addresses, names	EU (France)
Hetzner (Hetzner Online GmbH)	Rented servers that run the platform and, from 25 October 2026, the website, and S3-compatible document storage	All platform data, KYC documents, business documents, website server logs, website enquiries until delivered to Zoho CRM	EU (Germany)
Anthropic (Anthropic PBC)	AI-assisted document text extraction to pre-fill data from uploaded order documents	Content of uploaded order documents (purchase contracts, invoices, payment confirmations, transport documents)	US (Standard Contractual Clauses)
Sentry (Functional Software, Inc.)	Error monitoring of the platform	Error reports, user ID, masked session replays, feedback you send	EU (Germany) data region; US company (see Section 6)

Processor	Purpose	Data Processed	Location
Cloudflare (Cloudflare, Inc.)	From 25 October 2026: reverse proxy and content delivery network (CDN) for the website, which terminates the encrypted (TLS) connection and keeps request logs	IP address and request data of website visitors	Global network; US company (see Section 6)
Zoho (Zoho CRM)	From 25 October 2026: customer relationship management for website enquiries	Contact form data	EU data centre
Google (Google Ireland Limited)	Website analytics with Google Analytics 4, only with your consent	Analytics data, _ga and _ga_* cookies	EU / US (see Section 6)

Documents sent to Anthropic for text extraction are automatically deleted by Anthropic within 30 days of transmission (longer only where required by law or in cases of flagged misuse). Anthropic does not use this content to train its AI models.

We also use **Keycloak** as our authentication and authorization system. Keycloak is self-hosted on our own servers in Germany (rented from Hetzner) and is not a third-party sub-processor.

5.2 Other Recipients

Recipient	Circumstances	Legal Basis
Other trade partners	Limited contact data shared in the context of trade transactions (buyer/seller)	Contract performance
Obligated entities	Read-only access to shared KYC data, including the customer's network insights (Section 3.8), for trade partners who have a customer relationship	Legitimate interest / contract performance
Regulatory authorities	When required by law (e.g., supervisory authority, tax authority, law enforcement)	Legal obligation

5.3 Sub-processor Changes

We will notify affected users before engaging a new sub-processor or making material changes to our sub-processor arrangements.

6. International Data Transfers

Your personal data is primarily stored and processed within the European Union / European Economic Area (EU/EEA).

Where we transfer personal data to countries outside the EU/EEA, we ensure adequate protection through one of the following safeguards:

- **EU adequacy decision** — the European Commission has determined that the recipient country provides adequate data protection
- **Standard Contractual Clauses (SCCs)** — legally binding contracts approved by the European Commission that require the recipient to protect your data to the same standard as within the EU

The EU-U.S. Data Privacy Framework is an adequacy decision for US companies certified under it.

Currently, transfers outside the EU/EEA are limited to:

- **Stripe Inc.** (United States) — payment processing, covered by Standard Contractual Clauses
- **Anthropic PBC** (United States) — AI-assisted text extraction from order documents you upload (e.g., invoices, transport documents), covered by Standard Contractual Clauses
- **Google LLC** (United States) — Google Analytics 4 on our website, only with your consent; Google Ireland Limited may transfer data to Google LLC, which is certified under the EU-U.S. Data Privacy Framework
- **Cloudflare, Inc.** (United States) — from 25 October 2026, Cloudflare forwards requests to our website through its global network, so your request may be processed in a data centre outside the EU/EEA
- **Functional Software, Inc. (Sentry)** (United States) — error reports are stored in Sentry's EU data region in Germany; as a US company, Sentry may access them from the United States

A copy of the relevant Standard Contractual Clauses is available on request at info@novatrade24.com.

7. How Long We Retain Your Data

We retain personal data only as long as necessary for the purposes for which it was collected, or as required by law. The table below summarizes our retention periods:

Data Category	Retention Period	Legal Basis
Active user accounts	Duration of account	Contract
Inactive user accounts	2 years of inactivity, then reviewed	Legitimate interest
Trade partner contacts	Duration of business relationship	Contract
KYC submissions and identity documents (including the network insights snapshot a KYC version keeps when one exists)	10 years after end of business relationship	German Tax Code (AO §147)
AML screening results	10 years after end of business relationship	German Tax Code (AO §147)
Order and shipment records	10 years after completion	German Tax Code (AO §147)
Invoices and payment records	10 years after transaction	German Tax Code (AO §147)
Click2Comply prospect data	Duration of relationship or 2 years if inactive	Legitimate interest
Website enquiries in our backend	Until delivered to Zoho CRM, then cleared (only the Zoho reference, an internal reference and the delivery dates remain)	Contract (steps before entering into a contract)
Website enquiries in Zoho CRM	Up to 2 years after our last contact, unless a business relationship follows	Contract (steps before entering into a contract)
Google Analytics data	Per the vendor retention setting; the _ga and _ga_* cookies expire after up to 2 years	Consent
Error reports (Sentry)	Per the vendor retention setting	Legitimate interest
Email delivery logs	90 days	Legitimate interest

Data Category	Retention Period	Legal Basis
Authentication and access logs (including website server logs)	1 year	Security / legitimate interest
Audit trail	10 years	German Tax Code (AO §147)

After the retention period expires, personal data is securely deleted or anonymized.

Sub-processors may hold transient copies of transmitted data for short periods; for example, Anthropic deletes documents sent for text extraction within 30 days (see Section 5.1).

For detailed retention schedules, see our internal Data Retention Policy (GDPR-DRP-001).

8. Your Rights

Under the GDPR, you have the following rights regarding your personal data:

8.1 Overview of Rights

Right	Description	Article
Access	Obtain confirmation of whether we process your data and receive a copy	Art. 15
Rectification	Have inaccurate or incomplete data corrected	Art. 16
Erasure	Request deletion of your personal data ("right to be forgotten")	Art. 17
Restriction	Request that we limit the processing of your data	Art. 18
Data portability	Receive your data in a structured, machine-readable format (JSON or CSV)	Art. 20
Objection	Object to processing based on legitimate interest	Art. 21
Withdraw consent	Withdraw consent at any time where processing is based on consent	Art. 7(3)

8.2 How to Exercise Your Rights

You can submit a request by email to info@novatrade24.com.

To protect your privacy, we will verify your identity before fulfilling any request:

- **Registered platform users:** verification via your existing account session
- **Other requesters:** we may ask for reasonable proof of identity (e.g., copy of government-issued ID with photo, MRZ, passport number, and citizen service number blacked out)

We will respond to your request within **30 days**. If your request is complex or we receive a large number of requests, we may extend this period by an additional 60 days, in which case we will inform you within the initial 30-day period.

8.3 Limitations

In certain cases, we may be unable to fully comply with your request:

- **Tax retention obligations:** KYC data and financial records must be retained for 10 years after the end of the business relationship under German tax law (AO §147)
- **Earlier KYC versions:** when your data changes, the KYC version an earlier check was decided on is kept unchanged as part of that tax record, for 10 years after a newer version replaces it, and never less than 10 years after the end of the business relationship. This period is the longest retention obligation of the countries Novatrade24 trades in, currently German tax law (AO §147, 10 years). We correct your current data, but we do not delete or change those earlier versions on request

- **AML retention obligations:** where German tax retention does not apply, KYC data must be retained for at least 5 years under the Anti-Money Laundering Directive
- **Legal hold:** data subject to ongoing litigation or regulatory investigation
- **Manifestly unfounded or excessive requests:** may be refused or charged a reasonable fee (Art. 12(5) GDPR)

Where we cannot fulfill your request, we will inform you of the specific reason and your right to lodge a complaint with the supervisory authority.

8.4 Right to Lodge a Complaint

You have the right to lodge a complaint with the Dutch Data Protection Authority:

Autoriteit Persoonsgegevens

Website: <https://autoriteitpersoonsgegevens.nl>

Phone: +31 (0)70 888 8500

9. How We Protect Your Data

We take the protection of your personal data seriously and implement appropriate technical and organizational measures in accordance with GDPR Article 32.

9.1 Technical Measures

Measure	Description
Encryption in transit	All data transmitted over networks is encrypted using TLS 1.2 or higher (an industry-standard protocol that prevents interception)
Encryption at rest	KYC documents and sensitive data are encrypted at rest using AES-256 (a strong encryption standard that renders data unreadable without the correct key)
Authentication	Secure login via our Keycloak authentication system, with support for multi-factor authentication (requiring a second verification step, such as a code from your phone)
Access control	Staff can only access the data they need for their role ("least privilege" principle), enforced by technical controls within the platform
Audit logging	All changes to personal data are recorded in a permanent, tamper-proof log
Payment security	All payment card processing is handled by Stripe, which holds the highest level of payment security certification (PCI-DSS Level 1). Your card details never pass through our servers.
Pseudonymization	We use random identification codes instead of real names or personal identifiers in system logs, reducing the risk if logs are ever exposed
AI document extraction safeguards	Documents sent to Anthropic for text extraction are encrypted in transit, automatically deleted by Anthropic within 30 days, and are contractually excluded from AI model training
Error report scrubbing	Error reports are stripped of personal data other than your user ID before they are sent to Sentry, and session replays mask all text, inputs and images

9.2 Organizational Measures

Measure	Description
Security awareness training	All staff complete security awareness training within 30 days of joining, with annual refreshers

Measure	Description
Confidentiality agreements	All employees and contractors are bound by confidentiality obligations
Access reviews	Access rights are reviewed quarterly
Incident response	Defined incident response procedures with classified severity levels and escalation paths
Sub-processor oversight	Annual review of sub-processor security posture and DPA compliance

If you believe your data is not properly secured or you have any indication of misuse, please contact us immediately at info@novatrade24.com.

10. Cookies

10.1 What Cookies We Use

Novatrade24 uses the following cookies and browser storage:

Type	Purpose	Duration
Strictly necessary cookies	Required for the platform to function (authentication, session management, security)	Session or up to 30 minutes of inactivity
Analytical cookies (website only, only after you accept)	Google Analytics 4 cookies _ga and _ga_* , which help us understand how visitors use our website so we can improve it. Google Analytics is configured with Google signals and ad personalization signals turned off, and with advertising storage, advertising user data and ad personalization denied by default.	Up to 2 years
Local storage: consent choice (website)	nt-consent remembers whether you accepted or rejected Google Analytics, so the cookie banner does not ask again on every page	Until you change your choice or clear your browser data
Local storage: preferences (platform)	Remembers your language and display settings	Until you change them or clear your browser data

10.2 Managing Cookies

On our website, you can change your Google Analytics choice at any time under "Cookie settings" at the bottom of every page. Choosing "Reject" removes the Google Analytics cookies.

You can also configure your browser to refuse cookies or to alert you when cookies are being sent. Please note that disabling strictly necessary cookies may prevent you from using certain features of the platform.

You can also delete cookies that have already been stored via your browser settings. Consult your browser's help documentation for instructions.

11. Data Breach Notification

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) within 72 hours of

becoming aware of the breach, as required by GDPR Article 33.

If the breach is likely to result in a **high risk** to your rights and freedoms — for example, if sensitive identity documents or financial data are exposed — we will also notify you directly without undue delay, in clear and plain language, as required by GDPR Article 34. This notification will describe the nature of the breach, its likely consequences, and the measures we have taken to address it.

Notification to you may not be required if we have applied effective encryption or other measures that render the data unintelligible to unauthorized persons.

12. Automated Decision-Making

Novatrade24 does not make decisions based solely on automated processing — including profiling — that produce legal effects or similarly significantly affect you (Art. 22 GDPR).

Identity verification via iDenfy involves automated comparison of your facial image with your identity document. However, this process does not result in fully automated decision-making: KYC verification outcomes are reviewed and approved by authorized personnel before any decision affecting your access to services is made.

We also use an AI service (Anthropic Claude) for AI-assisted document text extraction: it reads uploaded order documents such as purchase contracts, invoices, payment confirmations and transport documents in order to pre-fill data fields on the platform. This is a technical processing step, not automated decision-making: extracted values are presented as suggestions and are always reviewed and confirmed by you or by authorized Novatrade24 staff before they take effect. This service is provided by a US-based company under Standard Contractual Clauses (see Section 6).

13. Children

Our platform and services are intended for business use and are not directed at individuals under the age of 18. We do not knowingly collect personal data from children. If you believe we have inadvertently collected data from a minor, please contact us at info@novatrade24.com so we can delete it.

14. Changes to This Privacy Policy

We may update this privacy policy from time to time to reflect changes in our processing activities, legal requirements, or business operations. When we make material changes:

- We will update the "Last Updated" date at the top of this policy
- For significant changes, we will notify registered users via email or platform notification
- The current version of this policy is always available at <https://novatrade24.com/privacy-policy>

15. Contact Us

If you have questions about this privacy policy, about how we process your personal data, or if you wish to exercise any of your rights, please contact us:

Novatrade24 B.V.

Europalaan 2
5232 BC 's-Hertogenbosch
The Netherlands

KvK 23080377
VAT NL805854940B01

Email: info@novatrade24.com
Phone: +31 (0)73 820 0019

16. Document Control

Version	Date	Author	Approved By	Changes
1.0	2026-03-26	CTO	CEO	Complete rewrite: aligned with ISP, ROPA, and current processing activities; added sub-processor register, Click2Comply, KYC/biometric processing, retention schedule, international transfers, cookie policy
1.1	2026-10-19	CTO	CEO	Added retention of superseded KYC versions; aligned contact phone number with the company office line
1.2	2026-10-21	CTO	CEO	Single master for the website PDF and page. Merged back the Anthropic sub-processor and US transfer from the separately published website PDF v1.1 of 2026-07-16 (Sections 3.4, 4.3, 5.1, 6, 7, 9.1, 12), limited to the order documents the extraction actually reads; added Sentry error monitoring (Sections 3.7, 4.3, 5.1, 6, 7, 9.1); added the website: from the cut-over on 25 October 2026, hosting on Hetzner servers in Germany behind Cloudflare and the contact form stored in our backend and delivered to Zoho CRM, and Google Analytics 4 only on consent (Sections 3.6, 4.1, 4.4, 5.1, 6, 7, 10); added customer profile reuse and network insights (Sections 3.8, 5.2, 7); Hetzner listed for servers as well as storage; corrected the IP address, analytics legal basis and cookie statements to match the website and platform

Next Review Date: 2027-03-26