

Privacy statement Travas Diwass B.V.

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This English version is a reading copy. The Dutch version is the authoritative one; in case of any discrepancy the Dutch text prevails.

Travas Diwass B.V. (CoC 42052378), registered at Eusebiusbuitensingel 79, 6828 HZ Arnhem, the Netherlands (hereinafter: "Travas"), attaches great importance to careful and secure processing of personal data. This privacy statement applies to all processing of personal data through the website www.travas.eu, the Platform and the associated SaaS service.

1. Travas has two roles under the GDPR

Depending on the data flow, Travas acts in two different capacities under the General Data Protection Regulation (GDPR):

- 1. Controller: Travas determines the purpose and the means of processing personal data of website visitors, (prospective) customers, account administrators of Clients, and for its own business operations (such as invoicing, marketing and support).**
- 2. Processor: For all personal data entered into the Platform by business users (Clients) and their authorised chain partners for the purpose of WSR notifications and digital consignment notes (CMR), Travas acts solely as a processor. In that case the Client remains the controller.**

2. Specification of the data processing

A. Data for which Travas is the controller

Travas processes the following data for its own business operations, website optimisation and contract management:

Category of data subjects	Type of personal data	Purpose of the processing	GDPR legal basis
Platform users (internal account administrators and staff of the Client)	• Full name • Business email address • Business telephone number • Job title / company name	Account management, providing secure access to the SaaS platform and offering customer support.	Performance of a contract (Art. 6(1)(b) GDPR)
Contacts, customers and leads	• Full name • Business email	Maintaining customer relationships,	Performance of a contract (for customers) or

	address • Business telephone number • Company name and sector	invoicing, commercial relationship management, follow-up of contact requests and sales activities.	legitimate interest (commercial interest, Art. 6(1)(f) GDPR)
Recipients of marketing and newsletters	• Full name • Business email address • Click and open behaviour within emails	Sending digital newsletters, commercial product information, updates about the SaaS platform and relevant professional information.	Legitimate interest (for existing customers for similar services) or consent (Art. 6(1)(a) GDPR through opt-in for non-customers)
System users (technical)	• IP address • Login data • Transactional system logs	Security of the Platform, fraud prevention, generating conclusive evidence and monitoring platform integrity.	Legitimate interest (Art. 6(1)(f) GDPR)
Website visitors and logged-in Platform users	• IP address • Cookie ID • Click behaviour and page views	Analysing and optimising the website and the interface of the Platform, generating usage statistics through Google Analytics 4, measuring the result of ads through the Google Ads conversion tag, and improving the SaaS service (solely on the basis of aggregated click behaviour, without processing any transport or	Consent (Art. 6(1)(a) GDPR) through the cookie notice

		production data that has been entered).	
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B. Data for which Travas is the processor (SaaS service)

Where Travas acts as a processor, it processes only the personal data entered into the Platform by the Client and its chain partners for the purpose of generating digital consignment notes (CMR) and submitting WSR notifications.

The exact specification of this personal data, the specific categories of data subjects and the applicable legal bases are set out in full in Annex 1 to the data processing agreement concluded with our business customers.

3. Explicit exclusions (negative list)

To avoid serious privacy risks and compliance burdens, Travas does not process special categories of personal data within the Platform. Clients, platform users and chain partners are strictly prohibited from uploading or manually entering the following data:

- Dutch citizen service numbers (BSN).
- Copies, scans or registration numbers of physical identity documents or driving licences.
- *GPS tracking: Processed only where this functionality is available within the Platform, is actively switched on by the Client, and the driver has given prior explicit and specific consent for it through the application (Art. 6(1)(a) GDPR).*

4. Retention periods

Travas applies the following principles for retaining data:

- **Data within the SaaS environment (customer data, WSR notifications and digital consignment notes):** The applicable periods for retention, return, passive archiving and destruction of these data flows are set out in full and exclusively in the general terms and conditions of Travas Diwass B.V. and in the data processing agreement concluded with our business customers.
- **Tax and invoicing data of customers:** Seven (7) years in accordance with the statutory tax retention obligation.
- **Communication and support logs:** Two (2) years after the last contact.
- **Website analytics:** Two (2) months by default.
- **Commercial leads and contacts:** At most 2 years after the last active contact (for example a quotation request or an exchange of emails), unless an agreement results from it.
- **Marketing and newsletter data:** Email addresses and associated profile data are kept until the moment of unsubscription. The historical sending and interaction data are permanently and irreversibly deleted within fourteen (14) days of unsubscription.

5. Sharing data and international transfers

Personal data is shared with third parties only where there is a statutory obligation or a contractual necessity to do so:

1. **Government bodies: The DIWASS system of the European Commission and competent national supervisory authorities (such as ILT, RWS and OLAF) on the basis of mandatory WSR obligations.**
2. **Sub-processors: Critical cloud and hosting providers and software suppliers that are necessary for the SaaS service. An up-to-date list of these partners is available through the Travas website.**

International transfers: All primary data storage takes place within the European Economic Area (EEA). Where sub-processors with a United States parent company are engaged and may gain indirect access to data, that transfer is fully covered contractually by the Standard Contractual Clauses (SCCs) adopted by the European Commission. For the transfer of analytical data of website visitors and Platform users to Google in the United States, Travas also relies on the EU-US Data Privacy Framework.

6. Technical and organisational security

Travas applies a strict and up-to-date security policy to prevent data breaches or unauthorised access, consisting among other things of:

- Encryption of data at rest and during transport (in transit via TLS/HTTPS).
- Logical access control based on authentication and two levels of access: read-only and full access.
- Continuous logging, monitoring and recording of actions in the Platform.
- Daily backups stored at geographically separated, secured locations within the EEA.
- Periodic vulnerability scans of the software infrastructure.

7. Rights of data subjects

Individuals may exercise the following GDPR rights in respect of the data for which Travas is the controller:

- The right of access to, rectification of or erasure of data.
- The right to restriction of processing or to object to processing.
- The right to object to direct marketing: Recipients can unsubscribe from newsletters and commercial messages free of charge at any time. This right can be exercised directly through the unsubscribe link in every email.
- The right to data portability.
- The right to withdraw consent at any time.

Requests can be submitted through privacy@travas.eu. Travas responds within thirty (30) calendar days at the latest. Where Travas acts as a processor, it forwards the request without delay to the Client concerned (the controller).

Data subjects also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).